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## Central Valley Regional Water Quality Control Board

18 December 2014

Drew Lehman  
Director, Environment & Planning  
50 California Street, 24<sup>th</sup> Floor  
San Francisco, CA 94111-9796

Phil Graham  
Recology Yuba Sutter  
3001 North Levee Road  
Marysville, CA 95901

### ***NOTICE OF VIOLATION: WET WEATHER SITE INSPECTION REPORT, RECOLOGY YUBA SUTTER LANDFILL, YUBA COUNTY***

The Recology Yuba Sutter Landfill is regulated by Waste Discharge Requirements (WDRs) Order R5-2003-0093 and Cleanup and Abatement Order (CAO) R5-2013-0704. On 5 December 2014 the Assistant Executive Officer issued Monitoring and Reporting Program (MRP) Order R5-2014-0830 for monitoring the compost area. Central Valley Water Board staff conducted a site inspection of the Recology Yuba Sutter Landfill on 3 December 2014.

This wet weather site inspection was conducted to observe the functionality of the compost area leachate collection system proposed by Recology in the *Compost Area Work Plan* dated 30 October 2013. In a letter dated 27 August 2014<sup>1</sup>, Recology validated the collection system would be constructed to contain all rainfall up to and including a 25 year, 24 hour design storm of 3.16 inches. As discussed in the Site Inspection Report (attached), the system constructed in preparation of the 2014/2015 wet season did not perform as designed.

During this inspection, staff observed the drainage and storage system was not properly sized to contain the leachate from a precipitation event less than the agreed design event of 3.16 inches.

The storage system became overwhelmed by reaching capacity within the early hours of the storm event. Tanks were overtopping and leachate generated from the compost area overwhelmed the sump capacity and pumping capability resulting in an unpermitted discharge to the Hog Farm. This Notice of Violation is being issued to the Discharger for failure to install a leachate collection system capable of holding the design storm event, as well as the uncontrolled release of leachate from the containment system.

Board staff notified Recology of these violations by email on 3 December 2014, and required that the Discharger make immediate improvements such that all leachate will be collected from all storm events up to and including the 25-year, 24-hour event. In addition, a California Water Code 13267 Order for a technical report was issued on 9 December 2014.

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<sup>1</sup> Confirmation of Understanding Regarding Continued Operation of Feather River Organics Compost Operation, Recology Yuba Sutter, Marysville, 27 August 2014

In accordance with Monitoring and Reporting Program Order R5-2014-0830, the Discharger is required to submit monthly reports. The first monthly monitoring report is due **15 January 2015** and every month there after until compost activities at the site have ceased.

The Discharger shall enter the above required monitoring reports into the online Geotracker database as required by Division 3 of Title 27 and Chapter 30, Division 3 of Title 23. In addition, the Discharger shall follow the directions in the Executive Officer's 26 September 2014 letter, and submit an email to [centralvalleysacramento@waterboards.ca.gov](mailto:centralvalleysacramento@waterboards.ca.gov) notifying staff that the monitoring report has been uploaded to Geotracker.

Please call Todd Del Frate directly at 916-464-4737 if you have any questions.

A handwritten signature in blue ink that reads "Howard Hold". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

HOWARD HOLD, P.G  
Senior Engineering Geologist  
WDRs Compliance and Enforcement

Enclosure: Site Inspection Report  
Site Inspection Photo Log

cc: Mayumi Okamoto, Office of Enforcement  
Paul Donoho, Yuba County Division of Environmental Health, Marysville, CA

CIWQS SIID #18602977  
CIWQS VID #982744

# CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

## INSPECTION REPORT

**DATE** 10 December 2014

**DISCHARGER:** Recology Inc.

**LOCATION & COUNTY:** Recology Yuba Sutter, Yuba County

**CONTACT(S):** Phil Graham, Jordan Norris, Stephanie Kendal

**INSPECTION DATE:** 3 December 2014

**INSPECTED BY:** Todd Del Frate, P.G.

**ACCOMPANIED BY:** Chris Day (Scientific Aid)

### OBSERVATIONS AND COMMENTS:

This wet weather site inspection was conducted to evaluate performance of the leachate collection system during a moderate storm.

On 3 December 2014, staff arrived on site and met with Recology's personnel including Mr. Phil Graham, Mr. Jordan Norris, and Ms. Stephanie Kendall. Mr. Chris Day and Mr. Todd Del Frate were present from the Water Board. The inspection started within the office building where Recology staff provided current rain data that had fallen over a 72-hour period. During this period, 2.17 inches had been recorded at the Yuba County Airport. This is approximately one inch less than the design storm the collection system is required to capture.

As shown in the attached Photo Log, the rainfall volume overwhelmed the leachate collection system. Staff inspected the southern sumps and storage Tanks. Rainfall on the compost area transported sediment to the sumps, which were quickly overwhelmed. Due to poor pump performance, the sumps silted up as more leachate entered the system. It is apparent in Photos 1 and 2 that leachate had risen to the top of the sidewalls of the sump, an indication the sump was too small and the pumps are undersized for the flow into the sump. During this portion of the site inspection, the rain event had stalled and the site was draining. Staff inspected the newly installed drain inlet of LF-2 (Photo 3) and the berm between LF-1 and LF-2 (Photo 4) and no areas of concern were noted with these facilities.

As the inspection moved north and past active composting, the rain continued. Staff observed a bank of eight Baker Tanks at the northern end of the compost pad. Staff also observed the low permeable aggregate pad and determined the pad was properly graded and appeared to be shedding the leachate. However, as shown in Photos 5 through 12, the storage system had become overwhelmed by the volume of leachate and overtopping of several storage tanks was observed. Leachate was spilling and draining back to the lower berm at a significant rate to cause ponding as shown in Photos 11 and 12. Ponding of leachate over the LF-1 waste management unit is a violation of WDRs Facility Specification B.12, the CAO Order #16, and Title 27, section 20365.

Approved: 

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As shown in Photos 13 through 16, staff observed the two northern sumps were full and pumps were overwhelmed by the rate of run-off from the compost area. This unpermitted discharge to the Hog Farm is of an unknown quantity and a violation of the CAO and Title 27, section 20365.

The site inspection continued around the northwestern compost area boundary and berm where staff observed additional ponding. The northwestern berm is approximately 1,500 feet long and has been constructed with approximately 14, 6-inch diameter PVC pipes to drain the compost area. These pipes can be seen in Photos 11, 12, and 17. Staff observed that multiple drain pipes were not properly installed to efficiently drain the runoff, nor were the drain inlets equipped to prevent material from entering the pumping system and storage tank with the leachate.

The inspection continued back to the southern Baker Tanks and sumps where areas of concern were observed. Photos 19 through 21 show the southwest sump being overwhelmed by the drainage from the processing area and that pumping from the sump was retarded by sediment transported during the rain event. Photos 22 through 24 show overflowing southern bank of Baker Tanks at capacity during this site inspection.



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TODD A. DEL FRATE, P.G. 7394  
ENGINEERING GEOLOGIST

Attachment: Photo Log



Photo 1: Compost Area southeast sump. Note extremely turbid water draining to sump. Also, sumps are dug into cover of LF-1 and earthen above concrete vault where pump is installed. Potential to allow liquid to infiltrate waste.



Photo 2: Looking south at the southeast sump. Note sediment transported by drainage to sump. Note water line on side walls above sump indicating water had risen during precipitation event and pump was unable to keep up with flow.



Photo 3: Storm water drain inlet at southwest corner of LF-2. This drain inlet was rebuilt during 2014 construction season.



Photo 4: Southern berm of LF-2 delineating boundary of compost area (to right of photo) and LF-2.



Photo 5: Bank of eight baker tanks to receive discharge from compost area. Note compost pad in foreground appears to be shedding rainfall well with no signs of erosion.



Photo 6: Looking northeast at the eight baker tanks. Note several tanks are spilling onto the compost pad area.



Photo 7: Baker tank overflowing.



Photo 8: Baker tank overflowing as shown in Photo 7. Note volume of leachate flowing from tank system.



Photo 9: Baker tank overtopping.



Photo 10: Spilt leachate draining to lower drain inlet. Note dark color of leachate and volume.



Photo 11: Ponding leachate contained by low permeable berm. Ponding of liquid on top of LF-1 is a violation of the WDRs.



Photo 12: Ponding leachate unable to drain along the northwestern berm of the compost area. Ponding liquid on top of LF-1 is a violation of the WDRs.



Photo 13: Offsite discharge of leachate to the Hog Farm from northern compost area.



Photo 14: Looking down drainage of northern sumps. Note sump is full and pumps are overwhelmed by volume of discharge from compost area.

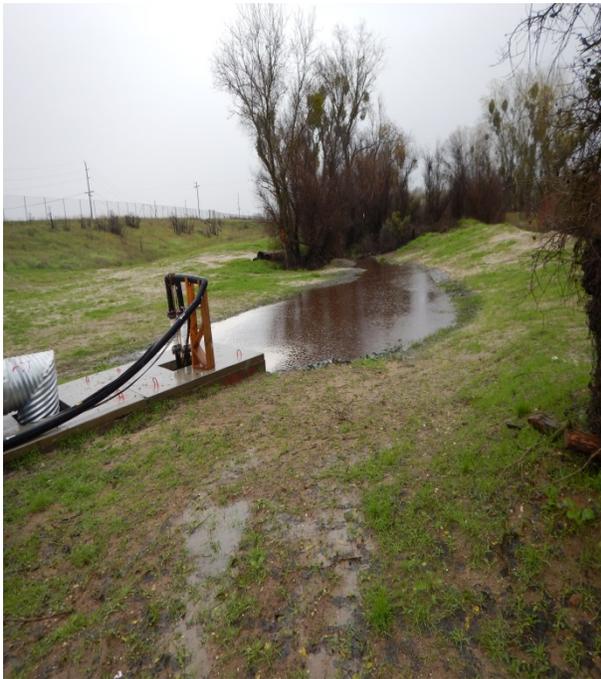


Photo 15: Looking down drainage from sumps. Note ponded leachate draining to offsite Hog Farm area.



Photo 16: Looking south back toward the sump discharge.



Photo 17: Looking at southwest corner of composting area where lack of drainage has allowed leachate to pond.



Photo 18: Looking south across green waste processing area to southern bank of Baker Tanks.



Photo 19: Looking south at the southwestern sump of the compost area. Note significant volume of liquid draining to sump. Also, quality of leachate is different than of quality of leachate shown in the northern part of compost area.

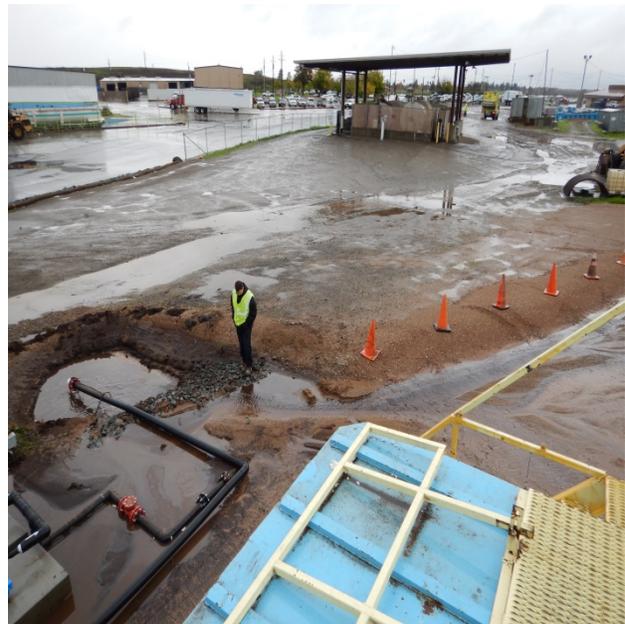


Photo 20: Overhead view of drainage to southern sump.



Photo 21: Cavitating pump due to clogging of southwestern sump. Note sidewalls of sump lined with compost debris and other fine material.



Photo 22: Overflowing Baker Tank.



Photo 23: Baker Tank full.



Photo 24: Looking east-southeast at bank of Baker Tanks. Note outside (right of center) perimeter berm and position of pipes and tanks. Overflow is being contained within compost area.