
Central Valley Regional Water Quality Control Board

TO: Recology Yuba Sutter case file

FROM: Wendy Wyels
Environmental Program Manager, Compliance/Enforcement Section

DATE: 30 December 2014

SUBJECT: RECORD OF COMMUNICATION

On 30 December 2014, my staff and I had a conference call with representatives of Recology Yuba Sutter and with Dave Lamun from the City of Marysville. I set it up the call because staff and I had talked to Mr. Lamun a few weeks ago, and he had a different perspective of Recology's compost leachate discharge to the sewer system than what Recology has stated in writing to us. I asked Mr. Lamun to be part of the call so that all parties could hear the same thing.

Recology is discharging compost leachate into the Marysville sewer collection system without the required industrial discharge permit, and for the last two storm events, they discharged 160,000 gallons and then over 400,000 gallons. This is far in excess of the 65,000 gallons they told Marysville and us that they would discharge. The 400,000 gallons caused problems with Marysville's lift station. Mr. Lamun said that he would prefer a discharge of less than 160,000 gpd at the peak of the storm, but that this is too high a flow to have for multiple days since he's concerned about a lack of capacity in his ponds. Marysville has been waiting for Recology to tell them what they want before starting to work on the industrial permit, but it turns out that Recology hasn't been talking to Marysville. I asked Drew how they could give us a water balance showing a certain volume of discharge to Marysville when they don't even know what they'll be allowed yet, and Drew just said that this was an iterative process.

After Dave was off the phone, we told Drew that their water balance doesn't reflect the volume of leachate that they need to dispose of after one storm in order to be ready for the next storm, or how it will be disposed. This is a serious flaw. I also said that other Title 27 dischargers are able to design ponds to hold the required storm event and that an iterative process is not necessary.

Recology still doesn't have storage and disposal capacity for all storm events up to, and including, a 25-yr, 24-hr event. They also don't know how much they can discharge to Marysville or under what conditions. I don't know when they'll be submitting a permit application to Marysville. I asked Drew to provide weekly updates.