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Recolog YSDI June 23 Response Received.

DelFrate, Todd@Waterboards

From: Wyels, Wendy@Waterboards
Sent: Monday, June 09, 2014 8:51 AM
To: Drew Lehman; pyamamoto@recology.com
Cc: Altevogt, Andrew@Waterboards; Hold, Howard@Waterboards; Okamoto, Mayumi@Waterboards; DelFrate, Todd@Waterboards
Subject: Compost Leachate Collection

Drew and Paul,

Thank you for the 30 May 2014 status report regarding the leachate collection issues at Recology Yuba Sutter's compost area. We understand that Recology has made the decision to move the compost area to a different facility, and the question is whether or not Recology must stop composing as of 1 October 2014 (per the Cleanup and Abatement Order) or whether the composting can continue for a 3-5 year transition period while Recology completes the planning and permitting necessary for a move to a different site.

Staff are willing to accommodate a 3-5 year transition period which would allow Recology to continue its composting operations at this facility. However, staff cannot approve the unauthorized discharge of leachate from the compost facility, which we believe would likely occur if some operational and capacity modifications are not implemented during this interim time period. If the Recology Yuba Sutter facility can be modified to meet the wastewater handling requirements in the draft Statewide Composting General Order (http://www.waterboards.ca.gov/water_issues/programs/compost/index.shtml), then staff are willing to modify the Cleanup and Abatement Order to allow composting to continue during the transition period. The relevant requirements in the Composting General Order are:

- Control and manage all run-on, runoff, and precipitation from all operational and storage areas under conditions of a maximum probable 25-year, 24 hour peak storm event.

- Wastewater handling system must be designed and operated to manage all wastewater from a minimum 25-year return annual total precipitation value distributed monthly in accordance with average (mean) precipitation values or equivalent engineered alternative approved by the Executive Officer.

We understand that Recology is currently proposing to collect all wastewater generated during a 5-year, 24-hour storm. This is a significantly lower standard than both the draft Composting General Order and what is currently required by the CAO; therefore Board staff cannot approve that proposal as it will likely result in an unauthorized discharge of wastewater. If Recology determines that it would be cost prohibitive modify its composting area to meet the above two conditions, then Board staff cannot allow compost or compost materials to be on-site during the rainy season during the transition period. However, Board staff would be open to allowing composting to take place during the dry season for the 3-5 year transition period.

Please respond to this email by **June 23** and provide an update as to Recology's plans to comply with the above conditions.

Wendy Wyels

Supervisor, Compliance and Enforcement Section

Central Valley Regional Water Quality Control Board

(916) 464-4835

wwyels@waterboards.ca.gov