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MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

17 May 2012

Bryan Clarkson
Recology
Environmental Compliance Manager
235 North First Street
Dixon, CA 95620-3027

REQUEST FOR UPDATED REPORT OF WASTE DISCHARGE (ROWD); WASTE DISCHARGE REQUIREMENTS ORDER R5-2003-0093 (WDR ORDER); RECOLOGY YUBA-SUTTER DISPOSAL, INC. (DISCHARGER); YUBA-SUTTER DISPOSAL, INC. LANDFILL (YSDI LANDFILL); YUBA COUNTY (COUNTY)

Our office is required to periodically review individual facilities WDRs to establish whether they describe the current operations and adequately addresses existing laws and regulations. The YSDI Landfill WDR Order is currently in this review process.

During Central Valley Water Board Title 27 Permitting Unit Staff (Permitting Staff) review of the files, including monitoring reports, it has been determined that the current WDR Order does not accurately reflect current operations at the site. Specifically, the WDR Order does not address the Feather River Organics composting facility located directly on the closed LF-1 (South Area) Waste Management Unit (WMU) and its potential water quality impacts. The WDR Order also does not adequately describe other current uses at the site such as an Integrated Waste Recovery Facility (IWRF), and maintenance facility.

Secondly, Permitting Staff recently commented on a California Environmental Quality Act (CEQA) document (State Clearinghouse SCH# 2012042038) for Operational Modifications at the Feather River Organics Compost Facility. The CEQA document proposed the addition of food waste to the composting operation. However, the composting facility is currently unregulated with respect to Porter Cologne Water Quality Act. Previously the facility operated under Central Valley Water Board WDR Waiver Order #96-031, which expired on 1 January 2003 and has not been renewed.

Furthermore, our file review indicates that our Compliance and Enforcement Section has issued several Notice of Violations (NOVs) at the YSDI Landfill. In a 14 April 2011 NOV Compliance and Enforcement Staff cited the Discharger for groundwater exceedences of the site's Water Quality Protection Standards for volatile organic compounds (VOCs), chloride and total dissolved solids (TDS). In a 12 August 2011 NOV Compliance and Enforcement Staff

KARL E. LONGLEY SCD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

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Recology Yuba-Sutter Disposal, Inc.

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performed a site inspection and found that "ponding was significant over WMU LF-1 which is a violation of Waste Discharge Requirements (WDRs) Order R5-2003-0093." The NOV concluded that "it was evident that drainage of WMU LF-1 has not been maintained and that settlement of the cover has occurred."

In a 6 December 2011 Compliance and Enforcement Staff requested the Discharger submit an amended ROWD for the YSDI Landfill that provided "a complete description of the facility and the current post-closure land uses of all WMUs, a complete description of the LFG system for all WMUs, and a complete description of the LFG and groundwater monitoring systems." In a 22 February 2012 letter Compliance and Enforcement Staff requested that the Discharger submit the amended ROWD by 30 June 2012.

Therefore, in conjunction with the earlier 22 February 2012 request, Water Board Permitting Staff requires that as part of the 30 June 2012 amended ROWD submittal, the Discharger include specific detailed information on the composting facility and its potential impacts to surface and groundwater. This information is required in order to update and revise WDRs Order R5-2003-0093. Water Board Permitting Staff is concerned that the current landfill cover below the composting operation is inadequate in preventing leachate from that operation from percolating through landfill waste in the LF-1 WMU and degrading underlying groundwater quality. Furthermore, settlement of the LF-1 cover as cited earlier is also problematic and must be adequately addressed in a revised WDRs Order.

If you have any questions, please call me at (916) 464-4815 or via email at vkjain@waterboards.ca.gov.



VINOO JAIN, P.E.
Water Resources Control Engineer
Title 27 Permitting and Mining

cc: Stephanie Kendall, Yuba County Environmental Health Department, Marysville