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**North Coast Regional Water Quality Control Board**

March 18, 2014

Susan Klassen  
Deputy Director  
County of Sonoma  
Department of Transportation and Public Works  
2300 County Center Drive, Suite B-100  
Santa Rosa, CA 95403

Dear Ms. Klassen:

**Subject:** Status of Efforts to Reduce and Eliminate Wastewater Discharges from the Compost Site and Sonoma County Central Disposal Site, Pursuant to WDRs Order No. R1-2013-0003

**File:** Sonoma County Central Disposal Site, WDID Nos. 1B801490SON and 1B99011RSON

For almost a year now, we have been in correspondence with Sonoma County Waste Management Agency (SCWMA) directly and through its consultant, SCS Engineers, with respect to the point source discharge of wastewater from the compost deck at the Central Disposal Site. As you are aware, the WDRs (R1-2013-0003) adopted March 14, 2013 by the Regional Water Board acknowledge and enforce our Basin Plan prohibition related to point source discharges of waste to coastal streams in the North Coast Region, and state that “[t]he discharge of wastes from activities occurring upon or within the landfill footprint, including composting activities, to stormwater sedimentation basins, surface, and/or ground water is prohibited.” The WDRs required in part that the Discharger (Sonoma County) provide us with a plan and schedule, by May 15, 2013, to cease all discharges of compost wastewater to receiving waters.

On or around May 14, 2013, we received the “Proposed Discharge Compliance Plan “(Plan), prepared by SCS, responding to the WDR directive. That Plan proposes design, review, and construction of an approved storm water compliance alternative by fall of 2014. In the months since receiving the Plan, we have explored first with SCS, then with Mr. Henry Mikus of SCWMA, questions on a number of issues, as discussed below, relating to both

short-term and long-term options and efforts to reduce and ultimately eliminate wastewater discharges to receiving waters, and various options and efforts to improve the quality of the leachate/wastewater discharged from the site in the interim. On February 20, 2014, Terri Cia and Diana Henriouille de Gonzalez of my staff met with Mr. Mikus, and County staff Glenn Morelli, Trish Pisenti, and Alex Sebastian at the compost site to observe current conditions and BMPs, and to discuss the status of treatment and disposal efforts underway.

### Compost Wastewater Treatment

The Plan proposes a possible long-term option involving treatment of compost wastewater prior to surface water discharge. This option is not compatible with our Basin Plan prohibition, and we have advised SCWMA that it is not a viable long-term option. However, in the interim before zero discharge is achieved, we encourage any effort to remove or reduce pollutants in or transported by compost wastewater. SCWMA has advised us of two treatment measures being employed: 1) sediment control BMPs at the lower end of the compost deck and 2) aeration in the upper compost pond. The latter treatment effort is intended to reduce odors, and is not directly a water quality issue unless it somehow affects the quality of the wastewater discharged from the pond; accordingly, this effort is not subject to formal review or approval by the Regional Water Board. With respect to the sediment controls, our staff observed check dams and wattles near the lower corner of the compost deck during the recent site visit and noted they appear to be collecting some sediment from the compost deck runoff. However, we note that given the great size of the compost deck above these controls, they are likely dwarfed by the volume of runoff and sediment generated on the compost deck during a large storm event.

### Reducing Discharge Volumes During the Current Winter Season

The initial Plan did not propose any efforts to reduce wastewater discharges during the 2013-14 rainy season. However, as our discussions proceeded with SCS and Mr. Mikus, SCWMA proposed to capture a portion of the runoff from each storm, diverting approximately 200,000 gallons of the first flush runoff into Baker tanks and emptying the tanks at an appropriate wastewater treatment facility between storms. While we encouraged SCWMA to pursue this option while working towards zero discharge, we learned recently that SCWMA had decided not to pursue this option after the Local Enforcement Agency (LEA) expressed interest in reviewing the project. Mr. Mikus advised us that as an alternative, SCWMA was instead going to review the option of capturing a portion of the runoff from each storm into the lower compost pond, and emptying that pond between storms. We have just received a proposal from Mr. Mikus indicating that the first 200,000 gallons of each storm will be collected in the lower pond.

In parallel to the first flush plans, we understand that the compost operators have been attempting to pump retained liquids from the upper pond between storms and spraying the liquids onto the road above the compost deck or reincorporating them into compost material, in an effort to address neighbor complaints about odors. This effort reportedly ensured that the pond was empty prior to the large storm in early February 2014, and we

understand that these efforts have continued, more recently with the assistance of the County, with a portion of the liquid being trucked offsite to the subregional wastewater treatment plant (WWTP) on Llano Road for treatment and disposal. We understand that to date, more than 1,000,000 gallons of leachate has been trucked to the WWTP, and these efforts will continue in the short term.

#### Reducing the Volume of Wastewater Generated During the Wet Season

We asked SCWMA whether the working area at the compost facility could be reduced over the rainy season so that less wastewater/contaminated runoff is generated, so less will overflow after the ponds are full. We were initially advised that this would not be a good option because it would interfere with the County's waste volume reduction goals/requirements. On more recent discussion, we learned that the compost facility takes wastes above and beyond those diverted from the landfill and representing the county's waste diversion goals. Therefore, we understand that there is some room for reduction of the working area, while still meeting the County's waste diversion goals. We recommend that both the County and SCWMA explore this option further.

We also asked whether finished compost material might be housed at an offsite facility, and were advised that this would require revision of the LEA permit, thus would likely prove too complicated. We encourage the County to explore this option and determine whether it is feasible to work with SCWMA to pursue LEA permit modification to allow for offsite storage of some portion of the compost material.

#### Long Term Elimination of Discharge/Zero Waste Discharge

##### Leachate ponds and pipeline

We understand that installing the plumbing and directing compost wastewater to the landfill's leachate disposal system is feasible from an engineering standpoint, but we have been advised that there are a number of obstacles associated with operating agreements, permits, and other agency concerns, all beyond the control of SCWMA and the compost operators. We also understand that these obstacles are being addressed and progress on removing them or resolving them is being made. We encourage the County to continue these efforts and to work with SCWMA to develop estimates of the compost deck storm runoff that might be diverted to the leachate ponds and pipeline and to describe conditions and restraints on the volume and timing of diversions.

##### New onsite ponds

The May 2013 Plan indicated that any proposed long term plan would require the creation of additional onsite capacity. Accordingly, the Plan indicated that SCWMA and its consultants were proposing to develop and design plans to construct one or more new ponds. Our staff learned during the February 2014 site visit that this option is apparently no longer viable and is not being pursued for development as SCWMA has been advised that the prospective pond locations are not available for use due to operational or construction needs associated with the landfill. During the site visit, our staff, Mr. Mikus,

and County staff observed and discussed various other potential locations both on and possibly offsite that might accommodate ponds while not interfering with other activities on the landfill site. We are not sure what further effort has been made to explore these or other possible sites since our visit, but understand from discussion at our Board meeting on March 13 that SCWMA and County staff are exploring possible onsite storage areas. We look forward to hearing more about this effort.

In summary, we have been encouraged by the recent stepped up efforts by SCWMA, the County, and the compost facility operators to reduce wastewater discharges over this winter season, and by the County's assistance in this effort, and we hope that you continue to work together over the remainder of the season to minimize the volume of discharges with future storms. We are, however, concerned by the lack of progress in developing a viable long-term discharge elimination plan within the proposed timeframe of completion before the next rainy season, and by the numerous obstacles that reportedly hinder this effort. It appears that some of the options that are physically possible are more directly in the control of the County than of the compost operators. Furthermore, as the named Discharger in our WDRs, the County of Sonoma is the entity ultimately responsible for ensuring that waste discharges from the Central Disposal Site comply with our WDRs and requirements and prohibitions incorporated therein. Accordingly, we are placing you on notice that we are setting a deadline of October 1, 2014 to cease all discharges of compost wastewater to receiving waters. Discharges occurring after that date will subject you to potential penalties of up to \$10,000 per day of discharge and \$10 per gallon of discharge over the first 1000 gallons, pursuant to Water Code section 13385.

We look forward to discussing this matter with you further and working together to ensure that compost wastewater discharges to waters of the State are controlled and eliminated before the start of the 2014 winter rainy season. If you have any questions regarding this matter, please contact Diana Henriouille de Gonzalez at (707)576-2350 or, by email, at [Diana.Henriouille@waterboards.ca.gov](mailto:Diana.Henriouille@waterboards.ca.gov) or David Leland at (707)576-2069 or, by email, at [David.Leland@waterboards.ca.gov](mailto:David.Leland@waterboards.ca.gov).

Sincerely,

Original Signed By David Leland For

Matthias St. John  
Executive Officer

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cc: Henry Mikus, Sonoma County Waste Management Agency, [Henry.Mikus@sonoma-county.org](mailto:Henry.Mikus@sonoma-county.org)  
Leslye Choate, Sonoma County LEA, [Leslye.Choate@sonoma-county.org](mailto:Leslye.Choate@sonoma-county.org)  
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