



Central Valley Regional Water Quality Control Board

Dt # 1786609

5 January 2014 ^{CD} → 2015

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Recology Yuba Sutter
3001 North Levee Road
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NOTICE OF VIOLATION: WET WEATHER SITE INSPECTION REPORT #2, 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 leachate collection system.

On 3 December 2014, Central Valley Water Board staff conducted a site inspection of the Recology Yuba Sutter Landfill. During the 3 December 2014 site inspection violations of the CAO occurred that required staff to conduct a second wet weather site inspection on 11 December 2014.

During the 11 December 2014 site inspection, staff was escorted around the site by Mr. Phil Graham, Mr. Jordan Norris, and Ms. Stephanie Kendall of Recology Inc. Staff conducted the inspection in the same order as the 3 December 2014 inspection. Initial observations indicated a significant effort to increase capacity of the collection system was made by the Discharger by adding upwards of 16 tanks, pumps, and hoses. The Discharger also utilized specific BMPs (i.e. wattles, hay bales, sand bags) to address sheet flow velocity across the site. To increase capacity of the southern sumps, the Discharger installed straw bales wrapped in plastic sheeting raising the sidewalls by approximately three feet.

During this inspection, similar problems that were noted in the 3 December 2014 inspection report were again observed including inadequate capacity of the sumps, inadequate pumping capability, drainage from the compost pad, ponding leachate, and discharge to the Hog Farm. Full storage capacity of the leachate collection system had not been reached during the time of the inspection (10:00 am to 13:30 pm). Also during the inspection the Discharger's employees and contractors were working to connect all storage tanks and install new discharge pumps. Unlike the 3 December 2014 inspection, the storage tanks connected were able to contain captured leachate that had been generated while staff was onsite. However, the exception was the northern sumps, which again were overwhelmed by the volume of leachate resulting in another illegal discharge. During the time staff had been onsite, the recorded precipitation amount from 04:00 am on the 11th till the time staff left at approximately 2:00 pm was 1.67

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

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inches. This precipitation amount is well below the 25 year, 24 hour design storm of 3.16 inches. Based on the precipitation recorded it was apparent the collection system installed was still unable to capture all leachate generated.

In an email dated 12 December 2014, the Discharger notified staff that tanks overflowed during the early morning hours and that an offsite discharge from the northern sumps occurred again. This overflow and offsite discharge also occurred even though the Discharger pumped approximately 160,000 gallons of leachate to the City of Marysville Publically Owned Treatment Works (POTW). Although the Discharger's water balance includes disposal of 65,000 gallons/day of leachate, they exceeded this agreed upon volume and the system was still unable to contain the leachate generated during this storm event. This Notice of Violation is being issued to the Discharger for failure to install a leachate collection system capable of holding the leachate generated during a storm event, as well as the uncontrolled release of leachate from the containment system.

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 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 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.



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

Enclosure: Site Inspection Report
Site Inspection Photo Log

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

CIWQS SIID #18647568
CIWQS VID #983024

2H# 1786613

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

INSPECTION REPORT

DATE: 15 December 2014

DISCHARGER: Recology Inc.

LOCATION & COUNTY: Recology Yuba Sutter, Yuba County

CONTACT(S): Phil Graham, Jordan Norris, Stephanie Kendall

INSPECTION DATE: 11 December 2014

INSPECTED BY: Todd Del Frate, P.G.

ACCOMPANIED BY: Howard Hold, P.G.

OBSERVATIONS AND COMMENTS:

This 11 December 2014 wet weather site inspection was conducted to evaluate compliance since the first wet weather site inspection conducted on 3 December 2014. The purpose of the inspection was to observe how the upgrades to the leachate collection system installed after the 3 December 2014 rain event would perform during the next storm. The weather conditions for this inspection were windy and wet. Expected rainfall amounts on the 11th of December was 2.33 inches.

Prior to this inspection, the Discharger had mobilized to the site additional storage tanks to increase capacity during storm events. According to the Discharger, 32 tanks were placed at the site. When staff arrived on the 11th, Recology contractors were working to plumb the tanks together. The Discharger also mobilized additional pumps and hose, and deployed additional BMPs to reduce velocity of sheet flow across the compost pad, as well as prohibit and retain compost fines from entering the drainage system. These BMPs included straw bales, straw waddles, and sand bags. The Discharger has made an effort to control and collect runoff from the compost area had been made by the Discharger since the 3 December 2014 site inspection. Yet the Discharger was unable to control and contain the leachate generated, which is a violation of the WDRs and CAO.

However, the rain event on the 11th was well underway when staff arrived and significant precipitation had fallen prior to the inspection and continued falling during the inspection. Precipitation that fell on the low permeable compost pad sheet flowed down slope to sumps located at the northern and southern ends of the compost pad. During the inspection, significant runoff was generated and the collection system had trouble keeping up with the volume of runoff. As shown in the Photo Log, sumps that were upgraded to handle increased volumes were again struggling during the storm; drains of LF-2 were clogged and lacked capacity to handle additional flows and ponded water was observed throughout the compost area.

During this inspection, staff observed many of the same issues that developed during the 3 December 2014 inspection including an unpermitted discharge. As shown in the Photo Log, the northern sumps do not have the pumping capability to move the volume of leachate generated during this storm event.

Approved:

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Consequently, another illegal discharge occurred. Staff observations concluded the Discharger did not have the pumping capability to move the volume of leachate generated during this storm. Excess volume of leachate could not be pumped at a high enough rate to prevent discharge to the hog farm. As shown in the Photo Log, the Discharger erected a temporary unpermitted basin to capture the leachate. In this instance, capacity in the northern sumps was the immediate compliance violation.

Ponding of leachate on the compost area was also observed at various locations throughout this site inspection including the lower berm of the compost area. This area was observed as an area of concern during the 3 December 2014 site inspection. Severe ponding of leachate was observed during the storm event even though drain pipes were freely draining. As observed in the first inspection, drain pipes have not been surveyed to promote proper drainage. In addition, BMPs used to reduce sheet flow velocities created ponding on the compost pad, which is a violation of the WDRs.



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



Photo 1: Southeast sump rebuilt following 3 December 2014 rain event. Note increased capacity but drainage from compost area still overwhelming pumping capability.

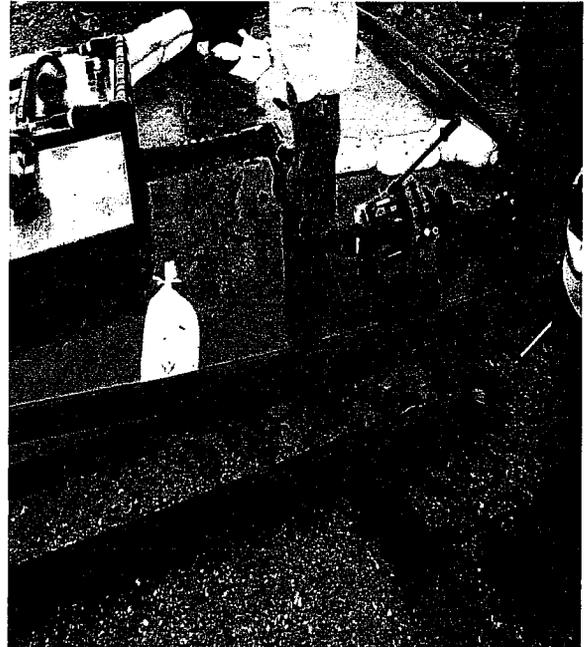


Photo 2: Repairs/upgrades to sewer discharge pump being made during rain event of 11 December 2014.



Photo 3: Southwest drain inlet for LF-2. Note turbid runoff redirected from compost area that had been bermed off. Filter of drain became clogged and overwhelmed with runoff.



Photo 4: Looking southeast across green waste processing area with newly constructed berm to separate clean storm water from leachate generated at compost area. Clean storm water directed to drain inlet shown in Photo 3.

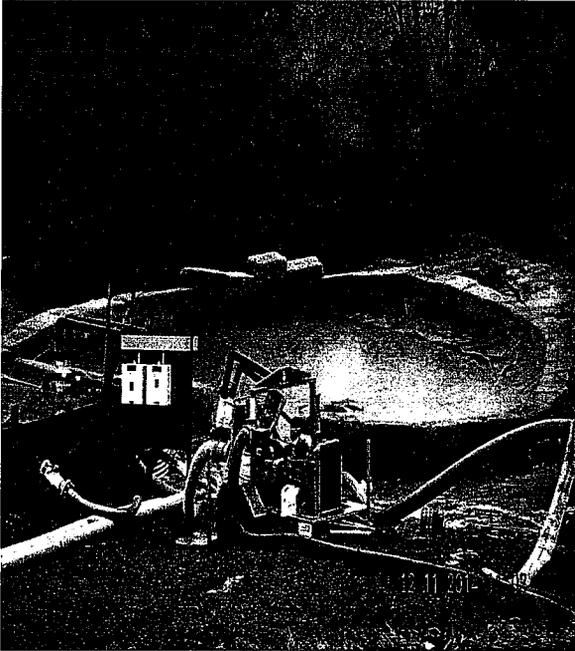


Photo 5: Visqueen pond erected by Discharger to capture leachate overflow from directly discharging to Hog Farm. This is not a permitted pond or an area allowed to accept this discharge.

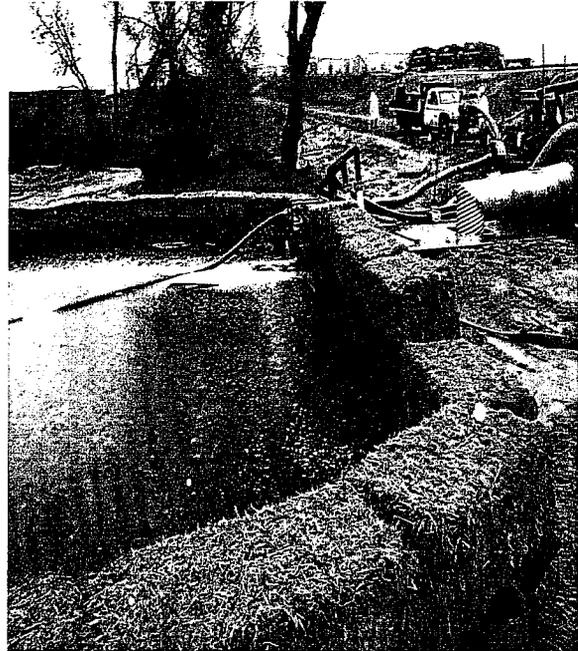


Photo 6: Discharge of leachate from compost area to visqueen pond. This occurred on 11 December 2014. This is second illegal discharge observed by staff.



Photo 7: Compost Area upgrades include using straw waddles and hay bales to reduce velocity of precipitation and the transportation of fine sediment that could clog the drain system.



Photo 8: Ponding of leachate was ubiquitous across the site during this site inspection. As shown, fine compost sediment (dark material) dropped out of standing water leaving a ring of high water on berm.