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April 30, 2014

Ms. Wendy Wyels
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Quarterly Progress Report, 1st Quarter 2014, Recology Yuba Sutter (RYS) Landfill
Waste Management Unit LF-1 - Cleanup and Abatement Order R-5-2013-0704

Dear Ms. Wyels,

This Quarterly Progress Report is being submitted in response to Requirement # 15 of the August 29, 2013 Cleanup and Abatement Order (CAO) R5-2013-0704 for 1st Quarter 2014 which requires in part a description of "work completed to date to comply with each of the above requirements, as well as what work will be conducted in the next quarter". Our report follows.

Requirement 1 - By 1 September 2013, the Discharger shall identify the composting operation by SIC Code 2875 on the facility information page in the 2012/2013 Storm Water Annual Report, and shall, beginning with the 2013/2014 reporting period include the appropriate compost analytes in the storm water sampling events and the facility's storm water Monitoring Program and Reporting Requirements (MPRR).

Recology Yuba-Sutter submitted the Annual Storm Water Report for 2012/2013 which included sampling data required under SIC Code 2875. Prior to the 2013/2014 rainy season, RYS environmental staff worked with Kiff Analytical to ensure chain-of-custodies and sampling bottles were included for the parameters required by SIC Code 2875. All qualifying storm events occurring Q1 of calendar year 2014 were sampled and analyzed for SIC Code 2875 parameters and consistent with the RYS facility's MPRR.

Requirement 2 - By 30 October 2013, the Discharger shall prepare and submit an updated Storm Water Pollution Prevention Plan (SWPPP) and MPRR in accordance with the Industrial Storm Water General Permit.

- a. *The SWPPP/MPRR shall identify all storm water drainages and discharge points associated with the facility and compliance sampling locations upstream of the Big Pond. If the Discharger believes that the Big Pond should not be considered a jurisdictional water of the US, then the SWPPP shall contain a detailed evaluation of the surface water and groundwater hydrology and surrounding wetlands characteristics, and the rationale for why the Big Pond should not be considered a jurisdictional water of the US.*
- b. *The SWPPP shall also identify how the Discharger shall temporarily separate contact storm water (leachate) generated at the compost and green waste areas from facility storm water, where the leachate will be collected for proper disposal, and how it will be disposed of. The temporary collection system shall be in place prior to the winter of 2013/2014.*

RYS submitted an updated SWPPP as required by the CAO on October 30, 2013. As part of the SWPPP, Cardno Entrix prepared as an evaluation of the "Big Pond" which determined that the "Big Pond" consists of

an upper and a lower pond. The upper pond is not a wetland and is therefore not a jurisdictional water of the United States. The lower pond is a wetland, however further study showed a significant nexus does not exist between lower pond and the Yuba River. Therefore, the lower pond is also not a jurisdictional water of the US. RYS understands, based on conversations with RWQCB staff subsequent to the submittal of the revised SWPPP and Big Pond evaluation, that a determination from the US Army Corps of Engineers (USACE) will be required to utilize STW-6 as the compliance sampling point for the facility. This new requirement was not included in the CAO; however, RYS has requested a determination from USACE. RYS submitted an application to USACE for a jurisdictional determination on March 19, 2014; based on subsequent contact with the USACE, RYS sent in a revised submittal to the Corps on April 22, 2014.

In response to comments from RWQCB staff regarding the temporary storm waster collection system, RYS submitted a plan prepared by Golder Associates dated November 15, 2013, titled "Conceptual Design of Temporary Stormwater Collection and Management System for Feather River Organics Composting Operation" on November 21, 2103. This submittal was not a requirement of the CAO. This plan provided details on the design of the temporary system to collect storm water runoff from the compost pad for storage for reuse in the compost system and/or discharge to the sanitary sewer. This temporary diversion system was completed during the fourth quarter of calendar year 2013 and functions as designed.

Rainfall during 4th Quarter 2013 was minimal and RYS did not have much opportunity to evaluate system performance. During the 1st quarter of calendar year 2014, RYS did evaluate the current system during rain events throughout and the system operated as designed. Rain events in 2nd Quarter 2014 will be monitored and are being evaluated as they occur.

*Requirement 3 - By **31 October 2013**, the Discharger shall submit a report documenting the (a) installation of five LFG extraction wells, (b) repairs to storm water drains and sewer pipelines identified in the 15 November 2012 Report, and (c) a proposed schedule for routine inspections and maintenance of the subsurface piping and storm water drains within LF-1. The report shall provide as-built drawings showing how repairs were completed and describe to what standard repairs were made.*

Landfill gas extraction well construction began July 31, 2013 and concluded on September 18, 2013. In total, five LFG extraction wells were installed: EW-22, EW-23, EW-24, EW-25, and EW-26. A CQA report including construction drawings, well and trench logs, compaction test results, construction photographs, and field daily reports was included with the letter report submitted to the CVRWQCB on October 31, 2013.

The repair of subsurface pipelines and storm water drains within LF-1 began July 15, 2013 and concluded on September 30, 2013. A CQA report including site maps and surveys, daily construction reports with photographs, and compaction test information was included with the report letter submitted on October 31, 2013.

Also included in the above noted October 31, 2013 report RYS proposed a schedule for routine inspections. No approvals or comments have been received from RWQCB staff on the proposed schedule for routine inspections.

*Requirement 4 - Beginning with the month of **October 2013**, the Discharger shall monitor the LFG system as described on Attachment A of this Order. Monitoring reports shall be submitted by the 1st day of the second month following sampling (i.e., the October 2013 monitoring report is due by 1 December 2013).*

RYS submitted monthly LFG reports for October and November as required and on time. The monthly LFG monitoring report for December 2013 and 4th Quarter 2013 was submitted on January 31, 2014. The monthly LFG reports for January and February were submitted as required and on time. The LFG report for March 2014 and 1st Quarter 2014 was submitted on April 28, 2014.