
North Coast Regional Water Quality Control Board

July 1, 2013

Henry J. Mikus, Executive Director
Sonoma County Waste Management Agency
2300 County Center Drive, Ste. B 100
Santa Rosa, CA 95403

Dear Mr. Mikus:

Subject: Comments on May 14 Proposed Discharge Compliance Plan for the Central Compost Site, Sonoma County

File: Central Disposal Site, Sonoma County

On May 20, 2013, we received the subject plan (Plan), prepared on your behalf by SCS Engineers, to fulfill Deliverable m., as shown in the table under Section C. (Provisions), Additional Conditions, 23. Deliverable Reports, Plans, and Technical Information, of Waste Discharge Requirements Order No. R1-2013-0003 (WDRs) for the Central Disposal Site. Upon review, we have the following questions and comments.

General Comments

The WDRs specify that “The 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.” Further, the WDRs required submittal of a plan and schedule to cease all discharges of compost wastewater to receiving waters.

1. Basin Plan Prohibition

The May 2013 Plan presents four alternatives for further evaluation and analysis, proposing completion of construction of the selected alternative in summer/fall 2014. Three of those alternatives include proposed discharge of compost wastewater to the County’s leachate force main pipeline, while the fourth alternative would involve wastewater treatment and discharge to surface waters. Please be aware that the Water Quality Control Plan for the North Coast Region (Basin Plan) generally prohibits new point

source discharges of waste to coastal streams and natural drainageways that flow directly to the ocean, and that existing discharges to these waters be eliminated at the earliest practicable date. While specific types of discharges, such as stormwater, may be permitted under general NPDES permits, there is no general NPDES permit that would allow a discharge of treated compost wastewater to Stemple Creek or tributaries thereto; therefore, **Alternative 4 is not a viable option for consideration.**

2. Discharge to Leachate Force Main Pipeline

a. Approvals/Agreements

As noted above, the Plan includes three alternatives involving wastewater discharge into Sonoma County's leachate force main pipeline. The Plan notes that use of the force main pipeline will require approval and/or agreement among other stakeholders including the County, the City of Santa Rosa, Republic Services, Inc., and the City of Rohnert Park (page 6, paragraph 2), however, the Plan does not indicate where or when this component of the project will occur. It seems like this process could be occurring now, and certainly on a parallel track to any engineering studies you are planning to conduct, since it is quite likely that the alternative you ultimately select for either short or long term disposal of the compost wastewater will involve use of the leachate force main pipeline. Have you started this process? If not, why not, and when do you propose to start it? How long do you think it will take? What specific elements are involved in this process?

b. Temporary piping system

Alternatives 1, 2, and 3 all mention conveying the compost wastewater to the leachate pipeline using a temporary piping system. While the location and layout of such a system would depend in part on the point of origin, which remains to be determined based on your evaluation of the alternatives, it appears that a temporary piping system could be constructed in the shorter term to convey some portion of the compost wastewater to the leachate force main pipeline in the interim period (specifically before the 2013-2014 rainy season) prior to selection and construction of the preferred alternative that is sized to accommodate the larger anticipated volumes based on Compost Area Drainage Analysis. We hereby request that you take the steps necessary to secure appropriate approvals and agreements and implement a short term system to at least reduce the volume of compost leachate discharged to Stemple Creek over the 2013-14 rainy season.

c. Leachate pipeline design and specifications

The third bullet on Page 8 describes a number of steps associated with use of the leachate force main pipeline. We expect some of this information is already available and that a number of these steps should be fairly simple and quick to perform. The schedule does not indicate where and when this component will occur, but similar to our comment regarding approvals and agreements above, it seems as though much of this information could be

compiled or developed right now; we recommend that you do so, and, as noted in b. above, we request that you secure/develop the information necessary for both an interim discharge of a portion of the compost wastewater or that you secure/develop the information and design specifications necessary for both an interim discharge of a portion of the compost wastewater over the 2013-14 rainy season as well as for the proposed zero discharge system to be implemented in time for the 2014-15 rainy season.

Specific Comments

Page 3, Section 4.2, para. 1 – mentions that the hydrologic analysis for the drainage design included anticipated runoff volumes from the upgradient office, storage, and maintenance areas.

Comment: This water is ostensibly “clean” stormwater runoff, suitable for surface water discharge in compliance with applicable general stormwater NPDES permits. Is there a short or long term measure that could be implemented to convey this water away from the compost deck in order to prevent it from coming into contact with compost material/wastewater and to reduce the total volume of wastewater that must be addressed (collected, conveyed, discharged) under this project?

Page 4, Section 4.4, para. 1 – mentions that Sonoma Compost Site storm water runoff characteristics are expected to be typical of those associated with general composting operations.

Comment: We understand that the site currently receives food wastes including meat, poultry plant waste feathers, and, at least until recently, poultry hatchery wastes including egg parts and dead chicks. While the goal of zero discharge applies regardless of the nature of the feedstock in this compost, we would note that the inclusion of animal tissue in the feedstock at this operation likely results in leachate constituents and/or constituent concentrations that are atypical of those associated with green waste composting operations.

Page 4, Section 4.4, para. 2 – indicates that wastewater from the Sonoma Compost Site appears to be suitable for “....on-site pre-treatment prior to direct discharge..”

Comment: As noted above, point source discharges of waste to coastal tributaries are prohibited, pursuant to the Basin Plan; direct discharge is not an option for wastewater from the Sonoma Compost Site.

Page 5, fifth bullet and last sentence of para. 2 – both reference treatment and direct discharge of treated wastewater to surface waters.

Comment: As noted above, direct discharge of waste is not an option for wastewater from the Sonoma Compost Site.

Page 5, Section 5.1 – indicates that the existing ponds SP-4 and SP-8 would be combined and lined with geosynthetic material or low-permeability soil.

Comment: What lining criteria do you propose?

Page 6, para. 1 – mentions construction of a storage basin within the Sonoma Compost Site area.

Comment: Would this pond be located on the Landfill 1 footprint? If so, please ensure that your analysis demonstrates that the pond will be designed and maintained so as to prevent any infiltration of impounded liquids into the underlying wastes, and demonstrate that the pond liner integrity can be maintained as the bottom experiences differential settlement associated with the underlying wastes.

Page 6, Section 5.2 (Alternative 2) – describes a scenario similar to but differing from Alternative 1 as additional wastewater storage capacity will be created outside of the Sonoma Compost Site area. The Plan does not indicate where such an impoundment might be created.

Comment: Should you select this alternative, please demonstrate that construction, use, and abandonment of the additional storage feature will not interfere with the landfill construction, operational, monitoring, and corrective action activities.

Page 7, Section 5.3 (Alternative 3) – describes another similar scenario, in this case lining the existing ponds SP-4 and SP-8 and constructing an additional storage impoundment that would be significantly larger than the impoundments considered in Alternatives 1 and 2.

Comment: See our comments on Alternatives 1 and 2, above, related to specifications or performance criteria for the SP-4 and 8 liner, waste settlement considerations should the impoundment be sited on Landfill 1, and potential for interference with activities associated with the Central Disposal Site.

Page 7, Section 5.4 (Alternative 4) – involves surface water discharge of treated wastewater.

Comment: As noted above, this is not a viable alternative for disposal of wastewater from the Sonoma Compost Site, and should be eliminated from consideration.

Conclusion

We concur with your proposed Plan, omitting Alternative 4 and/or any alternative involving discharge of compost wastewater, treated or otherwise, to receiving waters or tributaries thereto, and we look forward to receiving your selected alternative report and

design submittal. We also strongly urge you to take the steps necessary to secure approvals and either install a temporary conveyance system to allow for discharge of a portion of the compost wastewater into the leachate force main pipeline, or otherwise reduce the volume of wastewater collected and discharged to surface waters, in the interim period prior to selecting and implementing the preferred alternative project. Finally, we request that you advise us as to your responses to these comments by July 30, 2013; we would be happy to meet with you to discuss our comments and/or your responses.

Thank you for your efforts in this matter. If you have any questions or comments, please contact me at (707)576-2350 or, by email, at Diana.Henrioulle@waterboards.ca.gov.

Sincerely,

Diana Henrioulle Gonzalez, Chief
Land Disposal, Grants, and Enforcement Unit

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