

## Central Valley Regional Water Quality Control Board

8 July 2025

**CERTIFIED MAIL**  
**7021 2720 0000 9985 2712**

Bill Camarillo  
Agronim  
201 Kinetic Drive  
Oxnard, CA 93030

**CERTIFIED MAIL**  
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James Moore  
MCRWMA  
7040 North Highway 59  
Merced, CA 95348

**REVISED NOTICE OF APPLICABILITY**  
**WATER QUALITY ORDER 2020-0012-DWQ**  
**GENERAL WASTE DISCHARGE REQUIREMENTS FOR COMPOSTING**  
**OPERATIONS**  
**AGROMIN-MERCED HIGHWAY 59 COMPOST FACILITY**  
**MERCED COUNTY**

The Merced County Regional Waste Management Authority (MCRWMA) and Agromin (hereafter Dischargers) owns and operates, respectively, the Agromin-Merced Highway 59 Compost Facility (Facility) located within the property boundaries of the Highway 59 Solid Waste Landfill. On 1 April 2025, the Dischargers submitted a revised *Notice of Intent* (NOI) and technical report for the Facility to change their coverage under *Water Quality Order 2020-0012-DWQ, General Waste Discharge Requirements for Commercial Composting Operations* (hereafter General Order) for composting operations at the above-referenced site. The filing fee was submitted separately on 5 May 2025. The complete [General Order](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wqo2020_0012_dwq.pdf) can be accessed at the web address below:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2020/wqo2020\\_0012\\_dwq.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wqo2020_0012_dwq.pdf)

This *Notice of Applicability* (NOA) was developed after the review of the revised NOI and technical report as described in the attached *Staff Memorandum*, which is a part of this NOA. The Facility was originally enrolled under the General Order as a Tier I facility on 2 November 2022. Based on staff's review, the proposed Facility modifications will meet the conditions of the General Order, and the Facility is now covered under the General Order as a **Tier 2** composting operation. The enrollee identification number will remain **2020-0012-DWQ-R5007**. The Discharger must comply with all Tier II requirements of the General Order.

The filing fee for the Facility is based on Threat to Water Quality and Complexity rating of 3B. The submitted \$8,878 filing fee covers the first year permitted by this NOA. The Dischargers shall submit the required annual fee (as specified in the annual billing issued by the State Water Resources Control Board) until the NOA is officially terminated.

To fully comply with this NOA, please read the contents of the enclosed *Staff Memorandum* and all of the requirements of the General Order. The Dischargers are responsible for implementing all operations in a manner that complies with the General Order. Any noncompliance with this General Order constitutes a violation of the Water Code and is grounds for enforcement action, and/or termination of enrollment under this General Order.

Conditions of this General Order include but are not limited to:

1. A post-construction report must be submitted **within 60 days** of completing all construction activities associated with all applicable containment and monitoring structures, as required for compliance with this General Order and the MRP.
2. Prior to any facility expansion, a technical report with design information will have to be submitted **at least 90 days prior** to new construction of working surfaces, detention ponds, berms, ditches, or any other water quality protection containment structure for approval by the Central Valley Water Board staff.
3. A revised NOI is required to be submitted for review and approval **at least 90 days prior** to:
  - adding a new feedstock, additive, or amendment;
  - changing material or construction specifications;
  - changing a monitoring program; or
  - changing an operation or activity not described in the approved NOI and technical report.
4. A report certifying that all necessary facility upgrades to comply with the requirements listed in the DESIGN, CONSTRUCTION, AND OPERATION REQUIREMENTS –TIER 2 ONLY section of the General Order have been completed must be submitted for review and approval prior to accepting Tier 2 feedstocks or increasing the onsite volume of composting materials to above 25,000 cubic yards.

Attachment B of the General Order includes specific monitoring and reporting requirements that must be complied with, including routine monitoring and reporting to the Central Valley Regional Water Control Board. The Annual Monitoring and Maintenance Report as identified in the General Order must be submitted to the Central Valley Water Board annually by **1 April** each year.

All reports and other correspondence must be converted to searchable Portable Document Format (PDF) and submitted electronically to the Geotracker database under Global Identification Number T10000020490 with confirmation to be emailed to: [centralvalleyfresno@waterboards.ca.gov](mailto:centralvalleyfresno@waterboards.ca.gov).

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Attention:	Title 27 Unit
Discharger Name:	MCRWMA & Agronim-Merced Highway 59 Compost Facility
Facility Name:	Agronim-Merced Highway 59 Compost Facility
County:	Merced
CIWQS Place ID:	884034
Geotracker Global ID:	T10000020490

If you have any questions regarding this letter or the attached *Staff Memorandum*, please contact Elizabeth Welch at (559) 445-6127 or [elizabeth.welch@waterboards.ca.gov](mailto:elizabeth.welch@waterboards.ca.gov).



2020-0012-dwq-r5007  
For Patrick Pulupa  
Executive Officer

Enclosure: Staff Memorandum

cc: CalRecycle [WCMPDivision@CalRecycle.ca.gov](mailto:WCMPDivision@CalRecycle.ca.gov)  
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## Central Valley Regional Water Quality Control Board

**TO:** Kristen S. Gomes   
Senior Water Resource Control Engineer

Scott J. Hatton  
Supervising Water Resource Control Engineer

**FROM:** Elizabeth A.M. Welch  
Water Resource Control Engineer

**DATE:** 8 July 2025

**SUBJECT: REVISED APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD WATER QUALITY ORDER 2020-0012-DWQ, AGROMIN-MERCED HIGHWAY 59 COMPOST FACILITY, MERCED COUNTY**

### REPORT OF WASTE DISCHARGE

The Merced County Regional Waste Management Authority (MCRWMA) and Agromin (hereafter Dischargers) owns and operates, respectively, the Agromin-Merced Highway 59 Compost Facility (Facility) located within the property boundaries of the Highway 59 Solid Waste Landfill. On 1 April 2025, the Dischargers submitted a revised *Notice of Intent* (NOI) and technical report for the Facility to change their coverage under *Water Quality Order 2020-0012-DWQ, General Waste Discharge Requirements for Commercial Composting Operations* (hereafter General Order) for their composting operations at the Facility. The filing fee was submitted separately on 5 May 2025. The complete [General Order](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wq2020_0012_dwq.pdf) can be accessed at the web address below:

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The technical report, dated March 2025, was titled *Technical Report for General Waste Discharge Requirements for Commercial Composting Operations Order* (Technical Report) and was prepared on behalf of the Dischargers by EBA Engineering. The Technical Report was signed and stamped by a Certified Engineering Geologist.

The Facility was originally enrolled under the General Order as a Tier I facility on 2 November 2022 with the enrollee identification number of **2020-0012-DWQ-R5007**. The revised NOI and technical report propose modifications to change the Facility and its operations from a Tier 1 facility to a Tier 2 facility. As a Tier 2 facility, additional feedstocks and a larger quantity of onsite material will be permitted.

## **SITE CONDITIONS**

The Facility is located at 7040 North Highway 59 within the property boundary of the Highway 59 Solid Waste Landfill in Merced County. The landfill is approximately 609 acres in size and is comprised of Assessor's Parcel Numbers (APNs) 175-050-003, 175-060-001, 175-060-003, 170-070-001, and 170-070-002. The Facility's operational footprint will encompass approximately 7.5 acres of the 283.6 acres that comprise APN 175-060-001 in the same location as the existing composting facility. Two separate areas south of the Facility and within the landfill property will be used for the temporary storage of finished compost and are a combined five acres in size.

Groundwater below the landfill occurs under unconfined conditions, although localized semi-confined conditions have been observed. Depth to groundwater varies seasonally and has been declining over time. Depth to groundwater measured in the landfill's monitoring wells ranged from 136 to 174 feet below ground surface (bgs), which corresponds to an average depth of 156 feet bgs. The estimated depth to groundwater beneath the Facility is estimated to be from 160 to 165 feet bgs.

The groundwater flow direction has predominantly been to the southwest in the northern (with periodic westerly flow components), eastern, and central portions of the landfill with a hydraulic gradient of approximately 0.001 to 0.002 feet per foot (ft/ft). As for the southern portion of the landfill, the flow directions and gradient conditions are dynamic due to the operation of the landfill's groundwater extraction and treatment system. Site lithologic data suggests that groundwater beneath the site occurs under unconfined conditions in loose silty sands and gravels.

The Technical Report provided the average annual precipitation at the site is about 12.26 inches. The maximum average monthly precipitation of 2.46 inches occurs in January, and the minimum average monthly precipitation of 0.01 inches occurs in July. Evaporation data recorded between 1959 and 1960 at the Merced Municipal Airport station, presented a mean annual pan evaporation of 69.36 inches. The minimum mean monthly evaporation of one inch occurs in December/January and the maximum of 12 inches in July. The rainfall depth for a 25-year, 24-hour design storm event is 2.70 inches.

Land uses within one mile of the Facility include pastureland and agriculture. The Facility has two industrial water wells that it shares with the landfill. One is located at the existing entrance, and the other is located at the north boundary of the landfill and piped to a pressure tank and fire hydrant system adjacent to the composting area. Composting operations are prohibited within 100 feet of the well. The nearest surface water body to the Facility is the Henderson Canal, which is located approximately 200 feet to the nearest property boundary. The Facility is located on the central part of the property, which is approximately 2,200 feet from the Henderson Canal. The Facility is not within a 100-year flood plain.

Most of the stormwater runoff from the Facility will remain onsite and drain to a lined wastewater storage pond. However, runoff derived from the self-contained covered

aerated static pile (CASP) composting system, site entrance, and northernmost portion of the Facility will be diverted to the existing landfill drainage ditches along the southern and western boundaries of the Facility and will be discharged into the existing stormwater basin located at the southwest corner of the landfill. This basin is oversized, exceeding the 100-year, 24-hour design storm capacity and has never discharged off-site. However, if a large enough storm occurred it would drain into the Caltrans drainage, which is a tributary to Fahrens Creek. Fahrens Creek is tributary to Bear Creek and the San Joaquin River, in the Merced Hydrologic Area of the San Joaquin Basin.

Soil samples of native subgrade material within the boundaries of the proposed operations area were collected and tested for moisture-density relationships and hydraulic conductivity. The average hydraulic conductivity was  $7.2 \times 10^{-6}$  centimeters per second (cm/s), which met the General Order requirements of  $1 \times 10^{-5}$  cm/sec or less.

## COMPOSTING OPERATIONS

The Facility will be designed to accept up to 75,000 tons per year of feedstock materials and can store up to 100,000 cubic-yards on-site of organic material that would have otherwise been landfilled. This material includes the following:

- Agricultural materials,
- Green material,
- Pre-processed feedstock-ready CASP materials,
- Food material,
- Digestate,
- Mixed material including co-collected residential organics, and
- Organic wastes.

The following materials will be prohibited in accordance with the *Solid Waste Facility Permit* (SWFP): hazardous waste, radioactive waste, designated waste, and medical waste, dead animals, septage, ash, painted wood, treated wood, municipal solid waste (excluding the compostable fraction), burning material, and manure from known infected herds or sources monitored and reported by the California Department of Food and Agriculture. No additives or amendments are anticipated being used at the Facility.

The Facility will include processing and composting equipment, a concrete-lined CASP composting area, compacted soil tipping and working pads, and a lined wastewater storage pond. The Facility will be comprised of six primary operational areas that are identified as follows: Tipping Area, Processing Area, Covered Aerated Static Pile (CASP) Composting Area; Window Curing Area, Screening Area, and Finished Product Storage Area. There are an additional two Finished Compost Overflow Storage Areas.

Following grinding and other pre-processing activities at the Tipping and Processing Areas, the material will be transported to the CASP Composting Area where it will be placed into concrete-lined mass bed bunkers. The CASP piles will be aerated using an active control system that induces both positive and negative air flow. Temperatures will be monitored to ensure that the required period of 72 hours at no less than 55 degrees Celsius is achieved. This process is highly automated and controlled. The piles are instrumented with wireless temperature probes for ongoing monitoring and the aeration timing and flow rates will be adjusted to optimize the composting process.

The active composting phase takes approximately 24 days. When active composting is complete, the CASP piles will be dismantled and moved to the Windrow Curing Area to allow time for the product to mature. Material will cure from 24 days to a few months with an average of 40 days. Moisture will be added as needed. Once curing is complete, the material will be moved to the screening area where the overs are separated from the finished product prior to being placed in the Finished Product Storage Area or one of the two overflow storage areas.

## MONITORING AND REPORTING

The Facility will conduct a monitoring program as prescribed in the applicable portion of Attachment B of General Order Monitoring and Reporting requirements. Results of monitoring will be reported annually in the *Annual Monitoring and Maintenance Report*, which will be submitted by **1 April** of each year as long as the *Notice of Applicability* is in effect.

## SITE CLOSURE

At least 90 days prior to ceasing composting operations, the Highway 59 Compost Facility shall submit a *Site Closure Plan* to the Central Valley Water Board for approval. The site restoration shall include work necessary to protect public health, safety, and the environment.

## RECOMMENDATIONS

Based on staff review of the Technical Report, it is anticipated that the Dischargers can meet the requirements of the General Order. The *Notice of Applicability* can be issued and stay in effect as long as the Dischargers implements all operations in a manner that complies with the requirements of the General Order.

The Dischargers must comply with the following items:

1. A post-construction report must be submitted **within 60 days** of completing all construction activities associated with all applicable containment and monitoring structures, as required for compliance with this General Order and the MRP.
2. Prior to any facility expansion, a technical report with design information will have to be submitted **at least 90 days prior** to new construction of working surfaces,

detention ponds, berms, ditches, or any other water quality protection containment structure for approval by the Central Valley Water Board staff.

3. A revised NOI is required to be submitted for review and approval **at least 90 days prior** to:
  - adding a new feedstock, additive, or amendment;
  - changing material or construction specifications;
  - changing a monitoring program; or
  - changing an operation or activity not described in the approved NOI and technical report.
4. A report certifying that all necessary facility upgrades to comply with the requirements listed in the DESIGN, CONSTRUCTION, AND OPERATION REQUIREMENTS –TIER 2 ONLY section of the General Order have been completed must be submitted for review and approval prior to accepting Tier 2 feedstocks or increasing the onsite volume of composting materials to above 25,000 cubic yards.



