



July 17, 2015

Mr. Vinoo Jain
Mr. Marty Hartzell
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

**Re: Revised Tentative Waste Discharge Requirements for
Recology Yuba-Sutter & Feather River Organics**

Dear Vinoo and Marty:

We appreciate your time and effort in responding to our comments and in revising the tentative Waste Discharge Requirements for the Recology Yuba-Sutter landfill and Feather River Organics composting operations. The issues in dispute have been substantially narrowed, and it is likely that a contested hearing on this matter will not be necessary. However, we still have a number of concerns and we request that you give close and careful consideration to the attached comments. As we stated in our prior comment letter of June 19, our aim is to reach a cooperative resolution of the remaining issues. We would be pleased to meet with you, in person or by telephone, to discuss these issues further if you feel that would be helpful.

Consistent with the format of our prior comment letter, Attachment A to this correspondence sets forth our specific, itemized comments on the findings and provisions in the tentative Waste Discharge Requirements and Monitoring & Reporting Program. We appreciate your consideration and we look forward to your response.

Sincerely,

Mike Leggins
Vice President and General Manager

cc: Gino Yetka, CalRecycle
Andy Davis, Yuba County Environmental Health Department
Marc Bruner, Perkins Coie

ATTACHMENT A
COMMENTS ON REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS
RECOLOGY YUBA-SUTTER/FEATHER RIVER ORGANICS

Findings #9(d), #55, #56, #93 & #94 and Provision H.7-Task C: As indicated in our prior submittals, RYS recognizes staff's position on revising the site's existing groundwater detection monitoring network, but RYS and its consultants believe that the existing system is adequate and complies with the applicable regulations. In the interest of moving towards a cooperative resolution of this matter, RYS will not dispute the findings and provisions on this issue in the tentative WDRs, except as noted below for the newly added text to revised Finding #94. RYS will work with Regional Board staff during the development of the revised system to define the appropriate scope and implementation of the modifications.

Finding #21: RYS respectfully maintains that the newly added footnote should be deleted. The last sentence of this finding describes the Section 13267 Order issued by Regional Board staff on December 9, 2014. That Order did not state that "consecutive days" means "up to and including." As a result, RYS maintains that the new footnote does not represent an accurate characterization of the text of the Order. In addition, the new footnote does not appear to be necessary to support the adoption of the operative tasks and provisions in the tentative WDRs relating to the compost water management system.

Finding #35: Based on the response by Regional Board staff to the initial comments on this finding, RYS requests that the following sentence be added to the end of the finding: "There have been no detections of VOCs in LF-3 monitoring wells since December 2011."

Finding #94: As noted above, in the interest of moving towards a cooperative resolution of this matter, RYS will not dispute the requirement in the tentative WDRs to revise the site's groundwater detection monitoring system. In light of the fact that this requirement is no longer in dispute, RYS respectfully maintains that the large block of text that has been added to this finding should be deleted. This new text does not appear to be necessary to support the adoption of the requirements in the tentative WDRs relating to the revision of the site's groundwater monitoring detection system.

Finding #117, Financial Assurance Specification F.1 and Provision H.7-Task K: It likely will not be feasible to comply with the October 1, 2015 agency approval deadline for a revised cost estimate. In our experience, it typically takes CalRecycle a minimum of 90 days to review financial assurance estimates after they have been submitted. In addition, RYS has no control over the agency timeframe for approval. RYS therefore requests that the deadline in the WDRs specify the date by which RYS must submit the financial assurance estimates, rather than the date by which agency approval must be obtained.

Composting Specification #15: RYS respectfully maintains that Regional Board staff may have misconstrued the initial comment on this provision relating to the high-intensity, short-duration storm event. In particular, RYS is requesting that the WDRs include a standard for the high-intensity, short-duration storm event (i.e., the 25-year, 10-minute storm) for the compost water

conveyance system, so that RYS would not be in violation in the event the conveyance system could not handle a short-duration storm that exceeded this standard. RYS previously has discussed this issue with Regional Board enforcement staff.

Regardless of any such standard for the conveyance system, the storage and disposal components of the compost water management system would be required to meet the standards that are set forth in this specification (i.e., “up to and including a 25-year 24-hour storm event of 3.16 inches” for 2015-2016, and meeting the requirements “in Title 27 section 20375(a) and 20375(b) according to an approved Operation Plan” after October 1, 2016). RYS would be pleased to discuss this issue further with you and your team.

Closure & Post-Closure Maintenance Specifications C.23 & C.24: Given that Regional Board staff have already approved the referenced work plans (the Southern Area Work Plan and the Compost Area Work Plan), RYS would like to clarify that meeting the requirements of the approved work plans would constitute compliance with the particular specifications outlined in the tentative WDRs. This approach is consistent with the language of the specifications. In particular, Specification C.23 states: “Post closure operation and maintenance over LF-1, Southern Area, shall be performed *as described by the Southern Area Work Plan approved* by Central Valley Water Board staff on 29 April 2014.” Similarly, Specification C.24 states: “Maintenance of the LF-1 Compost Area pad will be performed *as described by the Compost Area Work Plan as approved* by the Central Valley Water Board staff on 7 May 2014.”

Closure & Post-Closure Maintenance Specifications C.23(f), (g): RYS respectfully requests that the requirement that cracks “must be repaired immediately” be changed to “must be repaired as soon as possible, and no later than 30 days after discovery of the crack(s) upon an inspection.” RYS is concerned that compliance with a requirement for “immediate” repair may not be feasible.

Closure & Post-Closure Maintenance Specifications C.23(k): The approved Southern Area Work Plan sets out a specific standard for the repair of unpaved areas, including the following two provisions to ensure that the repaired area maintains permeability characteristics that are similar to the existing cover materials: (a) compacted fill will consist of a soil with a fines content equal to or greater than the underlying LF-1 soil and will be compacted to a density equal to or greater than the underlying LF-1 soil; and (b) aggregate base shall exhibit a fines content equal to or greater than the underlying aggregate base material and will be compacted to a density equal to or greater than the underlying aggregate base. RYS respectfully maintains that these approved standards and provisions should be incorporated into the WDRs, rather than a permeability standard of 1×10^{-6} , which is not part of the approved work plan. As a historical note, RYS and Water Board staff discussed this issue during the CAO process and Water Board staff did not require this standard in Order #6 of the CAO. Adding this standard would be problematic as repairs might require deeper excavations to replace existing cover to achieve a permeability standard of 1×10^{-6} when only a few inches of material may be needed to bring low areas to grade.

Closure & Post-Closure Maintenance Specifications C.24(a)(3)(viii): RYS appreciates your consideration of our prior comment on this issue. RYS requests that the specification be changed

to provide for lysimeters installed in the compost pad “where the monitoring point is at least 0.5 feet above the waste.”

Closure & Post-Closure Maintenance Specifications C.25(a)(xi): RYS appreciates your clarification of the requirement for a contingency plan for the compost water management system. RYS understands that the contingency plan will document the types of emergency measures that RYS would use, as illustrated by the measures described in RYS’s correspondence to Regional Board staff dated December 18, 2014.

Provision H.7-Tasks D & E: It appears that the newly added Attachment G is more directly applicable to monitoring wells and that some of the listed information is not applicable to landfill gas well installations. It is RYS’s understanding that the work plans and reports prepared for LFG installations will not include information that is not pertinent to this work. Examples of information items listed in Attachment G that may not apply to LFG wells include a “brief description of local geologic and hydrogeologic conditions” (see Attach. G, Section A), “methods of development to be used” (see Attach. G, Section D), and a groundwater sampling and analysis plan (see Attach. G, Section G). RYS would like to work with staff to clarify the specific informational requirements in Attachment G that apply to LFG wells.

MRP Section A.2, A.7(b) & Table II: In its prior comments, RYS proposed an alternative sampling standard that included obtaining a TO-15 sample if there was greater than 1% methane in a perimeter probe. Thus, in cases where the methane exceeds 1%, the TO-15 protocol would be used, just as under the current version of the tentative WDRs.

To address situations where the methane is less than 1%, Golder Associates compared the VOCs detected in the landfill gas flare inlet sample with the VOCs detected using a PID with a krypton bulb (10.6 eV). Of the 19 VOCs detected in the landfill gas flare inlet sample, 15 are detectable using the specified PID. Golder Associates also compared the VOCs detected in landfill leachate with the VOCs detected using the PID. Of the 16 VOCs detected in landfill leachate in the fourth quarter 2014, 14 are detectable using a PID. Further, for the two VOCs that are not detectable using a PID (chloroethane and 1,2-dichloroethane), in all five leachate sumps the total concentrations of these two VOCs were low (0.5 µg/l and 0.3 µg/l, respectively). In contrast, the total concentrations for each of the 14 detectable compounds were much higher, ranging up to 36.2 µg/l, with an average concentration of 8.5 µg/l. This comparison indicates that the PID is capable of detecting the vast majority of the VOCs, and the more prevalent VOCs, that may be present in the leachate.

RYS respectfully maintains that its proposed approach is reasonable and sufficiently protective, especially since the PID monitoring is a screening tool to determine whether obtaining a TO-15 sample is warranted. Therefore, it is not necessary for the PID monitoring to detect and quantify every possible VOC, only to identify if sufficient VOCs are present to trigger TO-15 sampling.

MRP Section A.3: Please note that the LF-2 and LF-3 LCRSs are not configured to perform the annual LCRS testing as prescribed in the tentative MRP. Rather than annual testing, the operation of the LCRSs is evaluated qualitatively, by comparing current leachate extraction volumes and rates to historical volumes and rates. In addition, leachate depth measurements can be obtained immediately after pumping to verify that the leachate pumping system is working.

This information will be included in the site monitoring reports to demonstrate that the LCRSs are operating properly.

MRP Section A.7(b): It is not possible to measure and report the VOC mass removed from the individual disposal modules. This is because the landfill gas extraction system piping is not exclusive to each module. For example, the landfill gas extracted from the western side of LF-1 is piped into the LF-2 extraction system and is separate from the LF-1 perimeter landfill gas extraction system on the highway side of the site.

As a result, RYS respectfully maintains that it is not possible to comply with the requirement to obtain individual landfill gas samples from each disposal module to perform the calculation of mass removed. Thus, RYS requests that the requirement for measuring and reporting the VOC mass removed should pertain to the landfill gas flare inlet sample, which is the combined flow for all three WMUs. This is also the location where the flow rate is measured and recorded, which would facilitate calculating the total mass of VOCs removed.

MRP Section A.7(c)—Compost Facility Corrective Action Monitoring: RYS still is not clear on when the compost operations monitoring requirements in MRP Section A.6 apply, and when the compost facility monitoring requirements in MRP Section A.7(c) apply instead. RYS seeks clarification on when each of the two separate sets of monitoring requirements applies, and what the triggers are for moving from one set of monitoring requirements to the other.

Tables VIII & IX: These tables require semiannual reporting for the compost operations storage tank and sump monitoring and for the compost wastewater discharge monitoring. RYS proposes to submit this information on April 1 (the annual due date for the Compost Facility Annual Monitoring and Maintenance Report) and on October 1 (six months after the annual due date for this report).