



February 24, 2021

Elizabeth Welch, Water Resources Control Engineer  
Central Valley Regional Water Quality Control Board  
Southern Central Valley – Fresno Office  
1685 "E" Street  
Fresno, CA 93706-2007

Dear Ms. Welch,

Synagro West, LLC. has reviewed the Tentative Waste Discharge Requirements and Public Hearing for Menefee River Ranch & Synagro West, LLC for Modifying Waste Discharge Requirements Order R5-2003-0180 for El Nido Composting Facility Merced County.

We appreciate the opportunity to comment and provide recommendations as expressed in the February 19, 2021 Notice. Based on the Tentative Order R5-2021-XXXX language we offer the following text additions/changes in redline text addition/strikeout to clarify the biosolids storage capacity limit at any one point in time between January 1 and June 30, annually:


Finding 6. The Dischargers submitted an Amended Report of Waste Discharge, dated 9 November 2020, to allow for the onsite, interim storage of up to 10,000 wet tons at any one time of Class A and/or Class B biosolids between January 1 and June 30 annually. Stored biosolids would be removed from the facility and applied to already permitted land application areas in accordance with the *General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities* (State Water Resources Control Board Water Quality Order No. 2004–0012–DWQ).

Finding 10. This Order modifies Order No. R5-2003-0180 as a result of a minor modification to the facility's Conditional Use Permit CUP01-007 issued by Merced County on 26 January 2021, to include the seasonal storage of up to an additional 10,000 wet tons at any one time of Class A and B bio-solids awaiting agricultural use. Order No. R5-2003-0180 remains intact and applicable in all other aspects.

Discharge Specifications B.2 is modified as follows: The discharge shall remain within the designated disposal area at all times. Up to 10,000 wet tons of ~~stored~~-biosolids may be stored at any one time and may be removed from the facility and discharged in land application

areas that are enrolled under State Water Resources Control Board Water Quality Order No. 2004-0012-DWQ.

Should you have any questions or concerns regarding the content of our comment letter, please contact Ms. Simranpreet Kaur at 209-665-5853; [skaur@synagro.com](mailto:skaur@synagro.com).

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Simranpreet Kaur  
Sr. Technical Services Manager