

Central Valley Regional Water Quality Control Board

3 March 2017

Mike Repetto
Tracy Delta Solid Waste Management
P.O. Box 93
Tracy, CA 95377

NOTICE OF APPLICABILITY

**WATER QUALITY ORDER 2015-0121-DWQ
GENERAL WASTE DISCHARGE REQUIREMENTS FOR COMPOSTING OPERATIONS
TRACY DELTA SOLID WASTE MANAGEMENT, INC.
TRACY MATERIAL RECOVERY AND TRANSFER STATION
SAN JOAQUIN COUNTY**

On 2 August 2016, Tracy Delta Solid Waste Management, Inc. (the Discharger) submitted a Report of Waste Discharge (ROWD) and subsequent information which was determined to be complete on 23 February 2017 for the Tracy Material Recovery and Transfer Station (Facility). The ROWD includes a Technical Report, Notice of Intent (NOI), and a filing fee to obtain coverage under Water Quality Order 2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations (hereafter General Order), for composting operations at the above-referenced site. The complete General Order can be accessed at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2015/wqo2015_0121_dwq.pdf

This Notice of Applicability (NOA) was developed after the review of your ROWD as described in the attached Staff Memorandum which is a part of this NOA. Based on staff's review, the Facility meets the conditions of the General Order, and is hereby covered under State Water Resources Control Board General Order **2015-0121-DWQ-R5S005** as a **Tier II** composting operation. The Discharger must comply with all Tier II requirements of the General Order.

The filing fee for the Tracy Material Recovery and Transfer Station is based on Threat to Water Quality and Complexity rating of **3B**. The submitted \$4,699 filing fee covers the first year permitted by this Notice of Applicability (NOA). The Discharger shall submit the required annual fee (as specified in the annual billing issued by the State Water Resources Control Board) until the Notice of Applicability is officially terminated.

To fully comply with this NOA, please familiarize yourself with the contents of the enclosed Staff Memorandum and all of the requirements of the General Order. The Discharger is responsible for implementing all operations in a manner that complies with the General Order to assure compliance with the General Order, including any additional site specific mitigation measures identified in the Discharger's Technical Report for water quality protection. Any noncompliance with this General Order and/or failure to implement mitigation measures identified for water quality protection constitutes a violation of the Water Code, and is grounds for enforcement action, and/or termination of enrollment under this General Order.

KARL E. LONGLEY SoD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

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


- The Water and Wastewater Management Plan as submitted in the Technical Report and approved by staff in this NOA, must be implemented including but not limited to the following requirements summarized in the Staff Memorandum:
 - Compliance with Compost Pad Specifications;
 - Compliance with Wastewater Pond Specifications;
 - Compliance with Action Level 1 and 2 requirements including monitoring and reporting requirements;
 - Compliance with Compost Wastewater Drainage Conveyance Structure Specifications;
 - Limitations on application of wastewater pond water for dust control purposes.
- Submittal of final design report(s) i.e., plans, specifications, CQA manual, etc. for any improvement involving the containment of waste i.e., compost pads, conveyance structures, detention ponds at least 60 days prior to solicitation for construction bids.
- Technical reports must be submitted 90 days prior to each construction activity or in accordance with the previous item (whichever is greater), while post-construction reports must be submitted 60 days after the completion of each construction activity.
- Expansion of concrete working surface and drainage improvements must be completed at least 90 days prior to initiation of operation of CASP system or operation of windrow composting system expansion.
- The wastewater pond expansion with pan lysimeter and liner placement must be completed by **31 December 2018** and a final Post-Construction Report documenting the completion must be submitted within 60 days following completion of construction.
- Prior to initiation of operation of the proposed expansion, any construction of concrete working surfaces and drainage improvements required to expand the existing facility's windrow composting system or support the proposed Covered Aerated Static Pile (CASP) composting system must comply with General Order specifications for Tier II facilities, and the Discharger's ROWD.
- The implementation of additional monitoring and reporting requirements specified in the Staff Memorandum:
 - Maintenance of an active Wastewater Discharge Permit with the City of Tracy where a copy of the permit is included in the annual report; and
 - Detention Pond Action Levels 1 and 2 as required in section 6 of the Staff Memorandum.
- The Annual Monitoring and Maintenance Report, technical reports, and all monitoring reports must be uploaded into the State Water Board's GeoTracker database.
- A revised NOI is required at least 90 days prior to:
 - Expansion of the composting facility beyond that regulated by this NOA;
 - 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.

Attachment B of the General Order and the Staff Memorandum includes specific monitoring and reporting requirements that you must comply with, including routine monitoring and reporting to the Central Valley Regional Water Control Board. The first year Annual Monitoring and Maintenance Report as identified in the General Order must be submitted to the Central Valley Regional Water Board no later than **1 April 2018**, and then annually by 1 April each year.

All monitoring and technical reports and other correspondence must be converted to searchable Portable Document Format (PDF) and submitted electronically to the State Water Board's GeoTracker database (see General Order, Report Submittals). Once you receive an upload confirmation from GeoTracker that your report has been received, please send a courtesy email and confirmation number to centralvalleysacramento@waterboards.ca.gov and to the staff person indicated below. 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:	Brendan Kenny, Compliance and Enforcement Unit Brendan.Kenny@waterboards.ca.gov (916) 464-4635
Discharger Name:	Tracy Delta Solid Waste Management, Inc.
Facility Name:	Tracy Material Recovery and Transfer Station
County:	San Joaquin County
CIWQS Place ID:	826983

Now that the NOA has been issued, the Board's Compliance and Enforcement Section will provide management of this composting site. Brendan Kenny is your new point of contact for any questions about the General Order and NOA, and you may contact him at the contact email and phone number provided above. If you find it necessary to make a change to your permitted operations, Brendan Kenny will direct you to the appropriate Permitting staff.


PAMELA C. CREEDON
Executive Officer

Enclosures: Staff Memorandum dated 1 March 2017

cc: Nadine Langley, State Water Resources Control Board, Sacramento
Howard Hold, Central Valley Water Board, Rancho Cordova
Linda Turkatte, San Joaquin County Environmental Health, Stockton

Central Valley Regional Water Quality Control Board

STAFF MEMORANDUM

TO: Marty Hartzell, PG, CHG
Senior Engineering Geologist

FROM: Vinoo Jain, P.E.
Water Resources Control Engineer

DATE: 1 March 2017

SUBJECT: **APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD WATER QUALITY ORDER 2015-0121-DWQ, TRACY MATERIAL RECOVERY AND TRANSFER FACILITY, TIER II COMPOSTING FACILITY, SAN JOAQUIN COUNTY**



1. REPORT OF WASTE DISCHARGE

On 2 August 2016, Tracy Delta Solid Waste Management, Inc. (the Discharger) submitted a Report of Waste Discharge (ROWD) for the Tracy Material Recovery and Transfer Station (TMRTS) facility (hereafter Facility) located at 30703 S. MacArthur Drive (hereafter Site), south of the city of Tracy in San Joaquin County. The ROWD includes a Technical Report, Notice of Intent (NOI), and Filing Fee, to obtain coverage under Water Quality Order 2015-0121-DWQ, *General Waste Discharge Requirements for Composting Operations* (hereafter General Order) for composting operations at the above-referenced Site. The Discharger has since provided numerous updates and additional supporting information per Central Valley Water Board staff (hereafter Staff) inquiry whereby Staff has deemed the ROWD to be complete on 23 February 2017.

2. SITE DESCRIPTION

The Facility is located on a 51.7 acre parcel, Assessor Parcel Number 253-130-19, of which 8.4 acres is the permitted compost facility (See Attachment A). Ancillary Facilities that are not subject to the requirements of the General Order include a municipal solid waste Transfer Station, Material Recovery Facility, a mixed construction and demolition debris processing facility, an inert debris processing facility, an administrative office and shop, bale storage building and storage areas, fuel tanks and dispensing, vehicle wash facility, truck and employee parking, water supply well and storage tanks, scalehouse, and truck scales.

The Facility is currently limited to onsite storage of 68,700 cubic yards of solid waste under CalRecycle Solid Waste Facility Permit (39-AA-0024). The Facility is limited to receiving a maximum of 1,038 tons of material per week which was established by a CEQA entitlement in November, 2011 (Mitigated Negative Declaration, SCH # 2011102013) and a Solid Waste Facility Permit modification (October 2013).

The Site is located in the Tracy Subbasin of the San Joaquin Valley Groundwater Basin of the Great Valley Geomorphic Province (Great Valley) (California Department of Water Resources, Bulletin 118, [CDWR, 2003]). The Great Valley is a wide structural basin consisting generally of unaltered sediments and sedimentary rocks from the Upper Jurassic period to late Holocene and is bounded on the west by the Coast Ranges and to the east by the tilted intrusive block of the Sierra Nevada. The Tracy Subbasin is drained by the San Joaquin River and Corral Hollow Creek which is located immediately north of the Facility. On average, annual precipitation within the Tracy Subbasin is approximately 11 to 16 inches per year, in the south and north, respectively.

The Site lies within a reclaimed gravel quarry in alluvial fan deposits of Corral Hollow Creek. Sediments of the Corral Hollow Creek alluvial fan consist of unconsolidated continental material derived from the Diablo Range. The lithology is a heterogeneous mix of discontinuous layers of argillaceous sand, gravel, silt, and clay, with lenses of poorly sorted coarse sand and gravel, and locally, thin beds of argillaceous limestone, marl, and silt. The fine grained deposits are cemented loose to semi-consolidated, the gravel is locally cemented by either calcium carbonate or gypsum so as to form resistant strata of conglomerate (Sowers, et al., 1993). Discontinuous layers of poorly sorted sandy silts and clays, clayey sand and silty gravels are exposed in the quarry walls. Borings drilled at and in the vicinity of the site indicate that the thickness of alluvial deposits is approximately 100 feet below ground surface (BGS). Below these deposits, borings encountered semi-consolidated, poorly sorted, discontinuous deposits of clay, silt, and gravel of the Tulare Formation.

The Site is underlain by the Tulare Formation, the principle source of groundwater in the area. The Tulare Formation serves as the major reservoir for subsurface pumping of water for the west sides of San Joaquin and Stanislaus Counties. The Tulare Formation is composed of semi-consolidated, poorly sorted, discontinuous deposits of clay, silt, and gravel. The Tulare Formation is exposed as a thin band in the lower foothills to the west of the site and dips steeply northeastward into the San Joaquin valley. The formation dips on the order of 15 to 20 degrees at its outcrop area, but flattens and thickens in the vicinity of Tracy.

Groundwater occurs under unconfined (water table), semi-confined, and confined conditions within the western margin of the San Joaquin Valley. There are roughly two separate producing zones in the Tracy area; unconfined, and confined. The Corcoran Clay divides the groundwater system into a lower confined zone and an upper unconfined (and semi-confined) zone. Water quality in the upper, unconfined aquifer above the Corcoran Clay is relatively poor, and variable in quality. Beneath the Corcoran Clay, the confined aquifer contains water of higher quality. High water yields are reported from wells developed within the sediments below the Corcoran Clay. Most of the larger irrigation wells, the industrial wells and the municipal wells obtain their water supply from below the Corcoran Clay. Small domestic wells often obtain their supply from above the confining Corcoran Clay.

Hydraulic conductivities for materials that are similar to those encountered during the geotechnical investigations (i.e., sandy clay, silty sands and gravels) typically range from approximately 1×10^{-4} centimeters per second (cm/s) for the fine grained material (sandy clay) to 1×10^{-2} cm/s for coarse grained material (gravel). This range of values is expected to be an appropriate estimate for the Site.

Groundwater at the Site is expected to flow in a north-northeasterly direction, towards Corral Hollow Creek which is located approximately 500 feet north of the Site. This assessment is

supported by information presented for the leaking underground storage tank site located at 30350 South Tracy Boulevard South (CEMEX) which indicates similar potentiometric conditions (northeasterly flow with a gradient of approximately 0.003 feet per foot (ft/ft).

The Discharger estimates first encountered groundwater at a depth from native grade of about 90 feet below ground surface (BGS) or a groundwater elevation of about 75 feet above mean sea level (MSL). The corresponding maximum groundwater elevation in the project site vicinity is approximately 75 feet above MSL with an average groundwater elevation of approximately 25 feet MSL. Nine water supply wells were identified within a one mile radius of the Site.

Data from the Tracy Carbona Station (Station 048999) which is approximately one mile north of the Facility was used to estimate the average annual precipitation at 9.64 inches, and to calculate the magnitude of the design storm (25-year, 24-hour wet season event) at 2.08 inches (NOAA Atlas 14, Volume 6, Version 2). Based on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, Panel 745 of 950, Map Number 06077C0745F, the Facility is not located within 100-year flood plain. 06077C0745F. As a back-up measure for the potential for Corral Hollow Creek, located north of the Site, to overtop and spill into the Site, a berm has been constructed around the perimeter of the Site.

3. COMPOSTING OPERATIONS

The Facility proposes the use of windrow composting and covered aerated static piles (See Attachment B). The current compost method is windrow composting. Covered aerated static pile (CASP) composting is proposed for future development. The Discharger proposes to use the following feedstocks in its composting operations:

- a. **Green Material;**
- b. **Food Material;**
- c. **Agricultural Material;** and
- d. **Anaerobic Digestate** (excluding biosolids). The facility does not currently receive anaerobic digestate, but could in the future.

The Discharger stated that it is currently limited by its CalRecycle Solid Waste Facility Permit to a maximum feedstock volume¹ per year based on the amount of food material composted at the Facility. The Discharger has provided two scenarios below on how it plans to operate its facility based on how much food material it plans to compost:

Material Type	Scenario 1- Maximum Food Material	Scenario 2- Minimal Food Material
Food Material, Anaerobic Digestate	20,000 Tons Per Year (TPY) 40,000 Cubic Yards (CY)/year	0 TPY
Green Material, Agricultural Materials	33,976 TPY 113,253 CY/year	53,976 TPY 179,920 CY/year
Annual Totals	53,976 TPY 153,253 CY/year	53,976 TPY 179,920 CY/year

¹ Permitted amounts are based on tons per year; volumes are estimates based on assumed densities, which vary. The Discharger may operate its composting facility between the minimum and maximum food material so long as it does not exceed the maximum feedstock limitation per year (53,976 tons).

Various amendments may be blended with compost as requested by customers. These amendments include gypsum, agricultural minerals (nitrogen, potassium and phosphorus) and lime. The processing of gypsum from source-separated wallboard also occurs at the

facility. Only "clean" wallboard scrap from drywall contractors is accepted. Gypsum from dry wall sources is used as an additive to assure proper nutrient balance in the end product. The agricultural minerals and lime are provided from various agricultural mineral providers. Approximately 3,000 dry tons of gypsum, 1,000 dry tons per year of agricultural minerals and 500 dry tons of lime are used per year. No materials are added before composting has taken place, beyond bulking materials such as woodchips.

The Discharger proposes the following planned expansions/upgrades to the composting operation at the Facility:

Compost Area	Current Size (Acres)	Proposed Expanded Size (Acres)
Feedstock Receiving, Processing, and Storage Area	0.5	0.6
Active Composting Area	2.5	2.2 (1.72 acres windrow method and 0.5 acres CASP)
Finish Product Screening, Storage, and Loadout Area	1	0.97
Vehicle Access and Maneuvering Area	4	2.88

Planned upgrades will increase the concrete working surface, add covered aerated static pile (CASP) composting to the facility, include the construction of an 8,000 square foot (sf) building for feedstock blending, increase the size of the wastewater pond and incorporate a geomembrane liner for groundwater protection.

The Discharger must submit a technical report with detailed design information 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. The design information must include water balance calculations for detention ponds, design of wastewater conveyance features, liner materials and thicknesses, and rationale for liner system design. The technical report must ensure testing and quality assurance of liner materials and compacted soils in accordance with commonly accepted engineering practices, American Society for Testing and Materials test methods, and/or other appropriate material standards. The Discharger must submit a post-construction report to the Central Valley Water Board 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.

4. FACILITY TIER CLASSIFICATION

Based on the information submitted by the Discharger and confirmed by Central Valley Water Board staff, the Facility is classified as **Tier II** as defined by the General Order.

5. COMPLIANCE WITH COMPOSTING PAD SPECIFICATIONS

The General Order provides minimum specifications for design, construction, and operation of Tier II facilities working surfaces. Working surfaces must be capable of resisting damage

from the movement of equipment and weight of piles, and have a hydraulic conductivity of 1.0×10^{-5} centimeters per second (cm/s) or less.

The Discharger stated in the technical report that they shall comply with the General Order requirements for working surfaces used in composting operations including but not limited to designing and constructing such working surfaces with asphaltic concrete or Portland cement concrete. Therefore, all existing and future composting operations shall be conducted on asphaltic concrete or Portland cement concrete (See Attachment C).

The Discharger's maintenance of the working surfaces to minimize water infiltration shall consist of quarterly inspections of the working surfaces for cracks in the concrete, settlement, and ponded water. Cracks in the concrete that exceed ¼-inch in width will be repaired by filling the crack with a flexible elastomeric sealant conforming to ASTM D 1751 or D 1752 or a cement/epoxy slurry appropriate for concrete crack repair. Areas of differential settlement that create areas of excessive ponded water shall be repaired. Work of this nature will be performed as weather permits and under the direction of Facility personnel, a qualified contractor, or a qualified consultant. In the event the grades of the settlement repairs need to be confirmed, a level survey of the repair area will be performed by a qualified land surveyor.

6. COMPLIANCE WITH COMPOST WASTEWATER POND SPECIFICATIONS

Detention ponds must be designed, constructed, operated, and maintained to meet a hydraulic conductivity of 1.0×10^{-6} cm/s or less. Detention ponds must be designed and constructed with a pan lysimeter monitoring device under the lowest point of the pond, or an equivalent engineered alternative specified in the NOI and/or a technical report, and approved by the Regional Water Board. Also, detention ponds must be designed, constructed, and maintained (Pond Sizing) to prevent conditions contributing to, causing, or threatening to cause contamination, pollution, or nuisance, and must be capable of containing, without overflow or overtopping (taking into consideration the crest of wind-driven waves and water reused in the composting operation), all runoff from the working surfaces in addition to precipitation that falls into the detention pond from a 25-year, 24-hour peak storm event at a minimum, or equivalent alternative approved by the Regional Water Board.

- a. The Discharger stated in its technical report that they shall comply with the General Order requirements for its detention pond used in composting operations including but not limited to designing and constructing its expanded detention pond using the following pond liner system (from top to bottom- See Attachment C):
 - 1) 40 mil or (60 mil if HDPE) Geosynthetic Geomembrane Liner
 - 2) Geocomposite Clay Liner (GCL)
 - 3) Compacted Subgrade
- b. The Discharger stated in the ROWD that they will install a pan lysimeter below the lowest point of the detention pond capable of effectively monitoring the unsaturated zone below the detention pond bottom. The Discharger has determined that its proposed pan lysimeter design will prevent any leakage from the detention pond bottom in close proximity to the pan lysimeter from bypassing the pan lysimeter. The Discharger's proposed design for the pan lysimeter at a minimum consists of the following components (from top to bottom):
 - 1) 8-inch thick sand layer or equivalent to prevent pond leakage bypass;

- 2) 4-inch diameter schedule 80 PVC pipe riser (perforated bottom); and
 - 3) 60-mil HDPE geomembrane sheet formed as a pan of sufficient depth to retain captured leakage from the detention pond.
- c. The Discharger stated in the ROWD that the proposed detention pond expansion required to meet the pond sizing specifications of the General Order will require occasional export of compost wastewater to the City of Tracy's Wastewater Treatment Plant (WWTP). The Discharger has proposed to expand its current wastewater detention pond to 6.3 acre-feet storage capacity which includes two feet of freeboard to prevent overflow and/or overtopping when coupled with occasionally exporting wastewater to a WWTP. The exportation of compost wastewater is necessary at certain times in order for the Discharger to maintain sufficient freeboard needed to prevent overflow and/or overtopping of the detention pond. The Discharger's water balance predicts the necessity to export compost wastewater to the WWTP:

Month	Estimated pump/haul to WWTP	
	Cubic Feet ¹	Cubic Feet ²
Feb	-	52,000
Mar	-	50,000
Apr 1-15	-	10,000
Apr 15-30	-	3,000
Aug	12,000	-
Sep	12,000	50,000
Oct	10,000	40,000
Nov 1-15	4,800	22,000

¹Average Rainfall Year (9.64 inches)

²Wettest Rainfall Year (18.49 inches)

In order to ensure that the Discharger is allowed to export compost wastewater to the WWTP, the Discharger has obtained a Wastewater Discharge Permit (Permit# SP02-17) with the City of Tracy Utilities Department issued on 5 December 2016 and expires on 31 December 2019. As a condition of maintaining coverage under the General Order, the Discharger is required to maintain a valid Wastewater Discharge Permit with the City of Tracy that shall not expire for at least one year into the future at any given time.

In order to determine when the Discharger must begin exporting compost wastewater to the WWTP, the Discharger has established two action levels based on wastewater elevations in the detention pond. A summary of the action levels and responses required by the Discharger is shown below:

- 1) **Action Level 1** (2.1 feet (clearly marked to provide visual verification) below the minimum 2-foot freeboard level (also clearly marked to provide visual verification)). This action level is based on a minimum constructed pond capacity of 6.3 acre-feet. At Action Level 1, the Discharger shall:

- i. Review on site water usage to determine how more wastewater pond water can be used for compost windrow moisture conditioning and dust control. If the Discharger determines that it can apply wastewater to compost windrows for moisture control or use as dust control the Discharger must record weather conditions, daily precipitation total (24-hour period), and take photographs recording site conditions before application of wastewater of windrows, compost pads, and areas needing dust control and photographs recording site conditions after application to show that over application of wastewater did not occur;
 - ii. Increase wastewater detention pond water level inspection frequency to include daily inspections ; and
 - iii. Record of contact with the POTW to arrange for disposal of wastewater pond water or stage temporary storage tanks at the Facility.
 - 2) **Action Level 2** (0.5 feet (clearly marked to provide visual verification) equating to a minimum storage volume of 0.38 acre-feet below the minimum 2-foot freeboard level). The action level is based on a minimum constructed pond capacity of 6.3 acre-feet. At Action Level 2 the Discharger shall:
 - i. Review on site water usage to determine how more wastewater pond water can be used for compost windrow moisture conditioning and dust control. If the Discharger determines that it can apply wastewater to compost windrows for moisture control or use as dust control, the Discharger must record weather conditions, daily precipitation total (24-hour period), detention pond elevation, and take photographs recording site conditions before application of wastewater of windrows, compost pads, and areas needing dust control and photographs recording site conditions after application to show that over application of wastewater did not occur;
 - ii. Commence hauling wastewater pond water to the POTW, or pump to temporary storage tanks for future on site use; and
 - iii. Increase inspections to daily until the pond elevation returns to Action Level 1 status.
- d. As a condition of maintaining coverage under the General Order, the Discharger is required to complete the following items when Action Level 1 and Action Level 2 conditions are initiated:
 - 1) The Discharger shall **immediately** report by telephone and follow-up with an electronic mail message to the appropriate Central Valley Water Board compliance and enforcement staff within **24 hours** that it has initiated Action Level 2;
 - 2) Keep daily records of weather conditions, the elevation of compost wastewater in the detention pond, daily precipitation totals (24-hour period), and submit such records as part of the annual report and made available to Central Valley Water Board staff upon request;
 - 3) Keep records which are part of the annual report and made available to Central Valley Water Board staff upon request on the date, quantity (gallons), and disposal method (i.e. moisture control, dust control, temporary storage tanks, and exportation

of compost wastewater removed from the detention pond necessary to lower the detention pond level to below Action Level 2); and

- 4) Summarize the records kept including photographs taken during the Action Level 1 and Action Level 2 response in the annual report required by the General Order.
- e. The Discharger is limited to application of wastewater pond water for dust control purposes to areas where low permeability working surfaces have been installed and drainage from those surfaces is directed to the wastewater detention pond.

7. COMPLIANCE WITH COMPOST WASTEWATER DRAINAGE CONVEYANCE STRUCTURE SPECIFICATIONS

The General Order provides minimum specifications for design, construction, and maintenance of Tier II facility drainage ditches. Drainage ditches must be capable of conveying all precipitation and runoff from a 25-year, 24-hour peak storm event at a minimum, and have a hydraulic conductivity of 1.0×10^{-5} centimeters per second (cm/s) or less. The General Order also requires that berms/curbs and other drainage conveyance systems be designed, constructed, and maintained to manage, contain, and/or redirect precipitation flows from a 25-year, 24-hour peak storm event at a minimum.

The Discharger stated in the technical report that they shall comply with the General Order requirements for drainage ditches, drainage conveyance structures, and berms/curbs used in composting operations including but not limited to designing and constructing such conveyance structures with asphaltic concrete or Portland cement concrete. Therefore, all existing and future drainage ditches, drainage conveyance systems, and berms/curbs shall be constructed using asphaltic concrete or Portland cement concrete.

8. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

To fulfill requirements imposed by the California Environmental Quality Act ("CEQA")(Pub. Resources Code, § 21000 et seq.), San Joaquin County Community Development Department prepared and circulated an Initial Study and Mitigated Negative Declaration (SCH #2011102013) that contained an analysis of the potential for the project (expansion of the Facility) to result in significant environmental effects. The San Joaquin County Community Development Department certified the Initial Study and Mitigated Negative Declaration and filed a Notice of Determination on 28 October 2013 for expansion of the composting operation identified in the Discharger's ROWD. The Discharger' compliance with the General Order and any additional site specific requirements identified in a Notice of Applicability issued to the Discharger will ensure that any water quality impacts are less than significant.

9. TIMELINE FOR COMPLIANCE

The table below shows the proposed improvement plan schedule which incorporates on-going operations of the facility, seasonal weather, fluctuations in the market demand of finished product, and company resources. The TMRTS must comply with the proposed timeline.

Task/Improvement	Completion Dates
<p>a. Submittal of Final Design Report(s) i.e., plans, specifications, CQA manual, etc. for any improvement involving the containment of waste i.e., compost pads, conveyance structures, detention ponds</p>	<p>At least 60 days prior to solicitation for construction bids</p>
<p>b. Wastewater Pond Expansion and Liner Placement</p>	<p>31 December 2018¹</p>
<p>c. Expansion of Concrete Working Surface and Drainage Improvements</p>	<p>Must be completed at least 90 days prior to initiation of operation of CASP system or operation of windrow composting system expansion²</p>

¹ The wastewater pond expansion and liner placement shall occur before or concurrent with any other facility composting operation expansion (i.e. expansion of food waste processing, concrete working surfaces, and drainage improvements).

² Planned improvements to working surfaces and drainage features will occur as material throughputs dictate. If increasing overall throughput amounts render the existing concrete pad area too small, or the food material content exceeds the 15% threshold the Discharger shall project when this will occur and submit all required documents to the Regional Water Board at least 90 days prior to any construction.

10. MONITORING AND REPORTING

At a minimum, TMRTS will regularly inspect and maintain all containment, control, monitoring structures, and monitoring systems pursuant to Attachment B of General Order Monitoring and Reporting requirements and according to Section D of the Technical Report submitted as part of the ROWD. The frequency of inspections will be sufficient to prevent discharges of feedstocks, additives, amendments, compost (active, curing, or final product), or wastewater from creating, threatening to create, or contributing to conditions of contamination, pollution, or nuisance. The Discharger in response to site specific conditions is required to perform additional monitoring and reporting as described in this staff memorandum related to:

- a. Maintenance of an active Wastewater Discharge Permit with the City of Tracy where a copy of the permit is included in the annual report.**
- b. Detention Pond Action Levels 1 and 2 as required in section 6.d.**

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.

11. SITE CLOSURE

At least 90 days prior to ceasing composting operations, TMRTS shall submit a Site Closure Plan to the RWQCB for approval. The site restoration shall include work necessary to protect public health, safety, and the environment.

12. DISCUSSION

The Discharger has provided sufficient information through its ROWD for Central Valley Water Board staff to determine whether the Discharger's existing and proposed future expansion of its composting operations is eligible for coverage under the composting General Order. The Discharger's assurance that composting operations and the conveyance of compost wastewater will occur on asphaltic concrete and/or Portland cement concrete meets the requirements of the General Order for minimizing the discharge of Constituents of Concern to receiving waters. The Discharger's proposed expansion and lining of its compost wastewater detention pond meets the requirements of the General Order. The Discharger's wastewater management plan which includes action levels to ensure that the detention pond has sufficient capacity to maintain minimum freeboard requirements to prevent overtopping or overflow meets the requirements of the General Order. Finally, the Discharger proposed design and construction of conveyance structures such as berms, curbs, piping, etc. used to transport compost wastewater from the working surfaces that will meet at a minimum the 25-year, 24-hour peak storm event requirement of the General Order. The Discharger's proposed compliance schedule for expanding and lining its detention pond and other Facility improvements meets the requirements of the General Order.

13. RECOMMENDATION

Based on staff review of the ROWD and supporting documents, TMRTS meets the minimum requirements of the General Order. The Notice of Applicability (NOA) can be issued and stay in effect as long as the Discharger implements all operations in a manner that complies with the requirements of the General Order and site specific requirements in this Staff Memorandum.

ATTACHMENTS:

- Attachment A: Facility Expansion Site Plan
- Attachment B: Tracy Compost Facility Process Flow Chart
- Attachment C: Wastewater Pond and Working Surface Details

ATTACHMENT A: Facility Expansion Site Plan (Courtesy EBA Engineering)

FACILITY EXPANSION
TRACY MATERIALS RECOVERY AND TRANSFER FACILITY
30703 SOUTH MACARTHUR DRIVE
TRACY, CA 95377

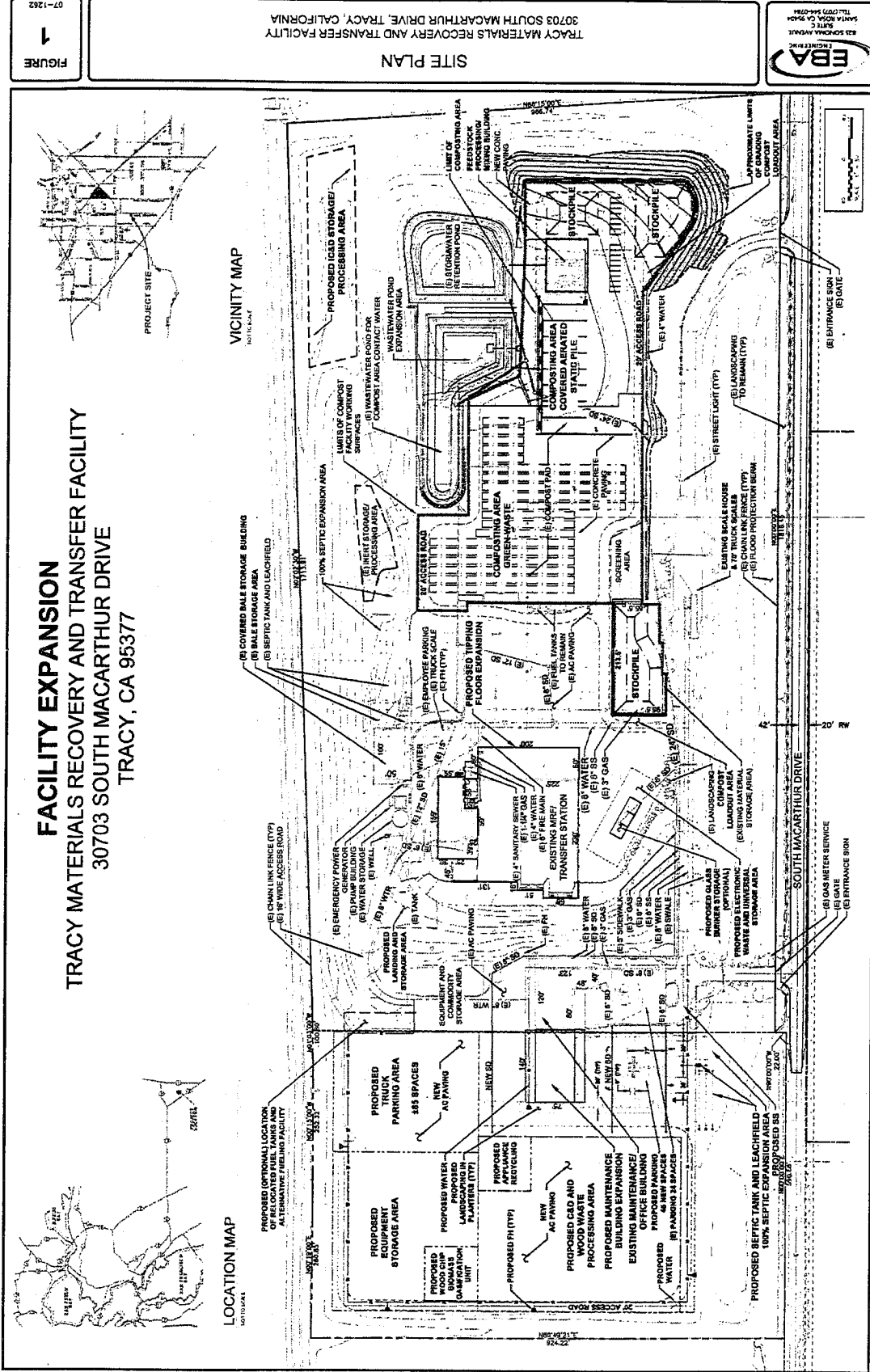


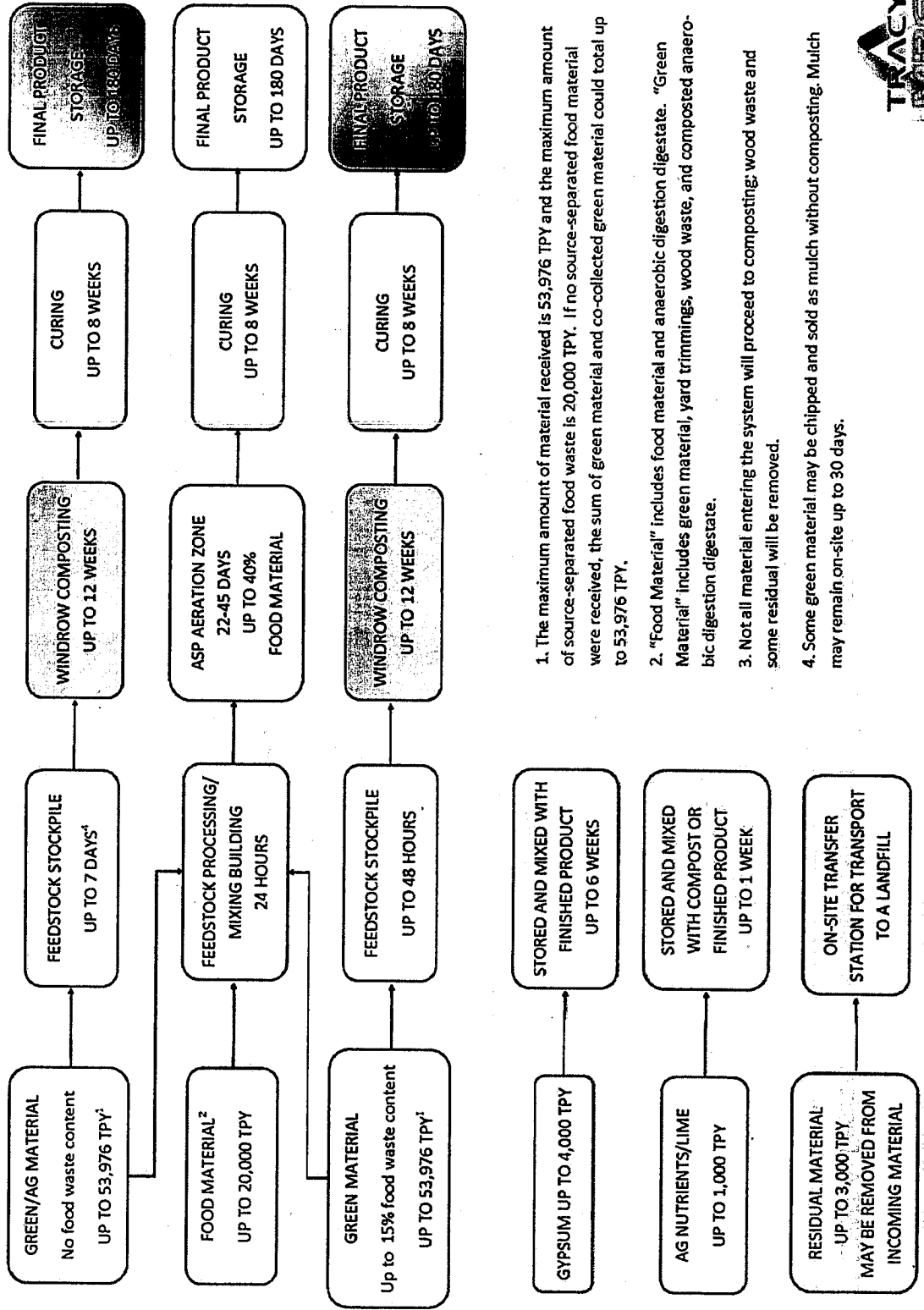
FIGURE 1

TRACY MATERIALS RECOVERY AND TRANSFER FACILITY
30703 SOUTH MACARTHUR DRIVE, TRACY, CALIFORNIA



ATTACHMENT B: Tracy Compost Facility Process Flow Chart (Source: ROWD Technical Report)

TRACY COMPOST FACILITY PROCESS FLOW CHART Following Planned Facility Improvements



1. The maximum amount of material received is 53,976 TPY and the maximum amount of source-separated food waste is 20,000 TPY. If no source-separated food material were received, the sum of green material and co-collected green material could total up to 53,976 TPY.
2. "Food Material" includes food material and anaerobic digestion digestate. "Green Material" includes green material, yard trimmings, wood waste, and composted anaerobic digestion digestate.
3. Not all material entering the system will proceed to composting; wood waste and some residual will be removed.
4. Some green material may be chipped and sold as mulch without composting. Mulch may remain on-site up to 30 days.



ATTACHMENT C: Wastewater Pond and Working Surface Details (Courtesy EBA Engineering)

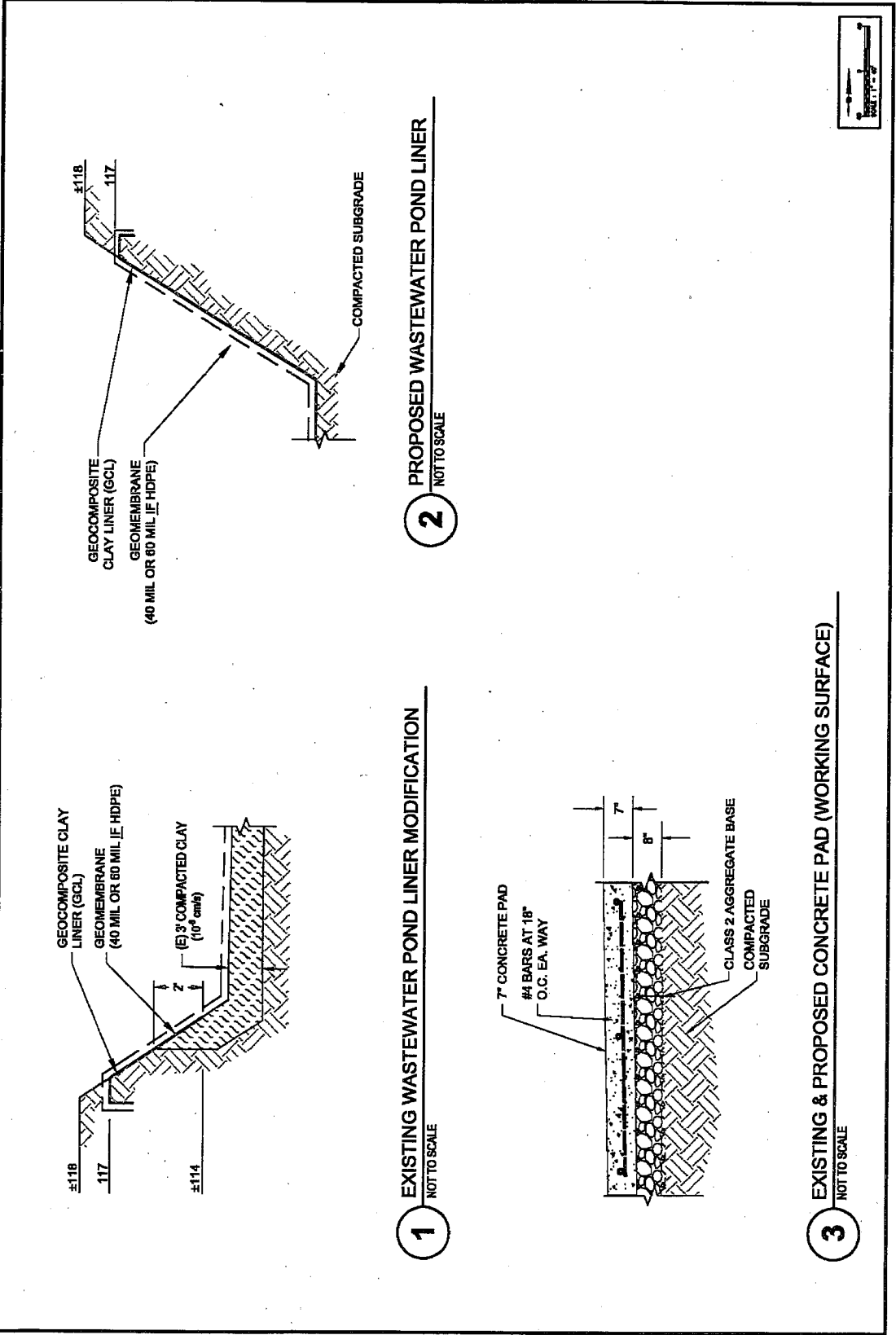


FIGURE 8
07-1282

WASTEWATER POND & WORKING SURFACE DETAILS
TRACY MATERIALS RECOVERY AND TRANSFER FACILITY
30703 SOUTH MACARTHUR DRIVE, TRACY, CALIFORNIA

