



September 14, 2011

Mr. Todd Del Frate  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670

**Re: Work Plan to Address Drainage Concerns as Requested in August 12, 2011  
Notice of Violation, Yuba-Sutter Disposal Inc. Landfill (Recology Yuba-Sutter  
Landfill), Yuba County**

Dear Mr. Del Frate,

In response to your letter dated August 12, 2011, Recology Yuba-Sutter (RYS), formerly Yuba-Sutter Disposal Inc. (YSDI), is transmitting the following work plan as requested to address drainage concerns identified during your inspection of the closed landfill site on June 29, 2011.

As discussed during your inspection, RYS had planned drainage improvement projects in several areas of the site for the 2011 construction season, prior to receiving your inspection results. The entrance to both the bin storage area/metal yard at the southern portion of the site, identified in photo 3 of your report, and the entrance to the compost facility north of the Material Recycling Facility, identified in your photos 6 and 7, were re-designed to eliminate ponding identified by site staff during the 2010-11 wet season. Construction has been completed on both of these projects as shown in attached photos #1, 2 and 3. The exposed soil at the compost facility (photo #3 in Attachment 1) will be seeded prior to the wet season. An engineer's drawing of the redesigned compost facility entrance including the bio-swale is included as Attachment 2.

The ponding identified in photo 2 of your report in the southeastern area of the bin storage area/metal yard will be filled and re-graded to promote surface water drainage to an existing storm water discharge point in the northeast corner of the yard. The facility is in the process of moving the concrete to allow regrading and has now completed surveying to establish drainage flow lines. We anticipate completion of the project by October 31, 2011.

The standing water identified in photo 8 of your report is wash water which is fully contained in the designated wash area of the site's truck wash facility. This facility drains through an oil water clarifier to the sanitary sewer for treatment at the City of Marysville POTW. At the time of your inspection, the truck wash drain was partially clogged causing back up of water from daily truck washing as well as the approximately 0.5 inch rain event that occurred the previous day. As part of routine maintenance, the facility cleans this area daily and inspects the drainage to maintain flow to the sewer system as shown in attached photo #5.

The ponding identified in photo 9 of your report in the compost facility has been filled and graded to promote drainage towards an existing vegetated swale to the north. As part of on-going maintenance, compost facility personnel fill low areas with a crushed concrete material throughout the year to eliminate and prevent ponding. The northern down-gradient edge of the compost facility's active windrows is shown in the attached photo #6.

Scrap metal (including white goods), identified in photos 4 and 5 of your report, is processed and stockpiled in the western portion of the bin storage area/metal yard and transported off-site to metal recyclers at least weekly and typically several times a week, based on volumes received and commodity market conditions. RYS contracts with Freon Free, a California Certified Appliance Recycler, for the removal and offsite recycling or disposal of refrigerant gases, including Freon, and other hazardous materials requiring special handling (compressor oil, mercury switches, and capacitors) from white goods. Housekeeping is an on-going best management practice performed by facility personnel and will be re-emphasized during the annual storm water pollution prevention refresher training which is scheduled for the start of the upcoming wet season.

A follow-up report will be submitted to your office upon completion of the bin storage area/metal yard re-grading project. If you have any questions or need additional information, please contact either Bryan Clarkson at 707-693-2108 or me at 530-743-6933.

Sincerely,



Maggie Johnson  
Environmental Compliance and Safety Manager

Attachments (2)

cc: Stephanie Kendall, Yuba County Environmental Health  
Phil Graham, Recology Ostrom Road  
Bryan Clarkson, Recology Environmental Solutions