24 June 2026

CERTIFIED MAIL
9589 0710 5270 1470 8211 23

Nolan Wilson
Liberty Composting
12421 Holloway Road, PO Box 309
Lost Hills, CA 93249

NOTICE OF APPLICABILITY

WATER QUALITY ORDER 2020-0012-DWQ
GENERAL WASTE DISCHARGE REQUIREMENTS FOR COMMERCIAL COMPOSTING OPERATIONS
LIBERTY COMPOSTING
KERN COUNTY

Synagro West, LLC (hereafter Discharger) owns and operates the Liberty Composting Facility (Facility) located at 1241 Holloway Road, Lost Hills CA 93249 in Kern County, APN 057-210-05. On 10 August 2024, the Discharger submitted a *Notice of Intent* (NOI), technical report, and filing fee for the Facility to obtain 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, revisions to the Technical Report were submitted on 16 January 2025 and 27 April 2026. The complete General Order can be accessed at the web address below:

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 NOI, technical report and its revisions, and design report as described in the attached *Staff Memorandum*, which is a part of this NOA. Based on staff's review, the proposed Facility modifications will meet the conditions of the General Order, and the Facility can be covered under the General Order as a **Tier 2** composting operation. The enrollee identification number is **2020-0012-DWQ-R5F017** The Discharger must comply with all Tier 2 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 $8,431 filing fee covers the first year permitted by this 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 NOA is officially terminated.

To fully comply with this NOA, please read the contents of the enclosed *Staff Memorandum* and all the requirements of the General Order. The Discharger is 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. Completion of Phase 1 construction of lined surface impoundment 1-2 by **31 October 2026.**

2. Completion of Phase 2 construction of lined surface impoundment 3 by **31 October 2027.**

3. 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. This includes, but is not limited to the following: grading of the working surface, inspection and repair of the perimeter berm, and the construction of the surface impoundments.

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

5. 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.

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 **L10004748466** with confirmation to be emailed to: 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:	Synagro West, LLC
Facility Name:	Liberty Composting
County:	Kern
CIWQS Place ID:	237467
Geotracker Global ID:	L10004748466
Geotracker Confirmation:	

If you have any questions regarding this letter or the attached *Staff Memorandum*, please contact Daniel Benas at (559) 445-5500 or daniel.benas@waterboards.ca.gov.

Digitally signed by Scott Hatton
For Patrick Pulupa
Executive Officer

Enclosure: Staff Memorandum

cc: WCMPDivision@CalRecycle.ca.gov; SanJuanC@kerncounty.com; wnolan@synagro.com; bcataldo@synagro.com

Central Valley Regional Water Quality Control Board

TO: Scott J. Hatton
Supervising Water Resources Control Engineer

From: Kristen S. Gomes *(digitally signed)*
Senior Water Resources Control Engineer

Daniel B. Benas
Water Resources Control Engineer

DATE: 24 June 2026

SUBJECT: **APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD WATER QUALITY ORDER 2020-0012-DWQ, LIBERTY COMPOST, KERN COUNTY, GLOBAL ID L10004748466**

On 10 August 2024 Synagro West, LLC (Discharger) submitted a Notice of Intent (NOI), technical report, and filing fee for its Liberty Compost facility (Facility) for coverage as a Tier II facility under *Water Quality Order 2020-0012-DWQ, General Waste Discharge Requirements for Commercial Composting Operations* (General Order). Liberty Compost is an existing facility and is currently regulated by Waste Discharge Requirements Order R5-2009-0018 (WDRs) and its corresponding Monitoring & Reporting Program (MRP), which will be rescinded in the future after compliance with the General Order is achieved. The *Technical Report to Support Permitting of the Liberty Composting Facility Under General Order WQ 2020-0012-DWQ* (Technical Report) was prepared on behalf of Synagro by WSP USA Environment & Infrastructure, Inc., and signed and stamped by Mary E. Kairouz, PG (PG 8761), and Gary L Kramer, PG (PG 7308). The Discharger submitted revisions to the Technical Report dated 16 January 2025 and 27 April 2026 to address staff's comments. The enrollee identification number for the Facility is 2020-0012-DWQ-R5F017.

SITE CONDITIONS

The Facility is an existing facility and owned and operated by Synagro West LLC. The Facility is located at 1241 Holloway Road, Lost Hills CA 93249 in Kern County, APN 057-210-05 and is comprised of 163 acres.

The total permitted operational capacity by other agencies is 786,000 tons of inbound organic wastes per year, 196,500 tons of biosolids for storage of Class B or higher biosolids and 93 inbound trucks delivering waste organics per day.

Water supply for facility operations is obtained from the Lost Hills Water District. Water supply delivery is from the Service Area 1 Canal that terminates one mile north of the Facility. Water supply is pumped from Liberty's distribution canal turn-out into a six-inch Schedule 40 polyvinyl chloride pipeline into a 20,000 gallon frac tank and two 5,000-gallon poly tanks.

The Facility is located on the western margin of the San Joaquin Valley at elevations that range from approximately 403 to 426 feet above mean sea level. The climate of the area is classified as steppe-arid, cold according to the Köppen Classification System. The dry climate is characterized by having a shortage of water with a low annual mean precipitation rate because water evaporates quickly from the elevated temperatures.

Precipitation data is from the University of Oregon Prism Time Series Data Website accessed on August 8, 2024 (Prism, 2024). The Prism dataset consists of 129 years of interpolated rainfall data for calculations. The annual average minimum and maximum precipitation values are 1.82 and 14.86 inches, respectively, with an annual average of 6.47 inches of precipitation per year. The amount of precipitation for the 25-year, 24-hour design storm event is 2.22 inches according to the National Oceanic and Atmosphere Administration (NOAA, 2024).

Evapotranspiration in the area of the facility is about 62.5 inches per year according to the California Irrigation Management Information System (http://www.cimis.water.ca.gov/cimis;CIMIS, 2024).

Land uses within one mile of the Facility include:

- North – Agricultural and unused land
- East – Vacant land and Lost Hills Oilfield operations
- Southeast – Solar panel farm
- South – Agricultural and Holloway Gypsum operations
- West – Agricultural land

Native soils underlying the Facility are identified as Panoche clay loam and Typic gypsiorthids- Kimberlina association, according to the Natural Resources Conservation Service online soil survey database (http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx).
Panoche clay loam underlies the western two-thirds of the facility; the remainder is underlain by Typic gypsiorthids-Kimberlina association.

Groundwater beneath the region occurs under perched, unconfined, and confined conditions. The hydrology under the Facility is well defined by borehole geologic and geophysical log data from five on-site groundwater monitoring wells and auxiliary pilot boring. The primary aquifer directly underlying the Facility is a water table aquifer in the alluvial sediments. An overlying zone of perched groundwater is present on the eastern margin of the facility in the area of former monitoring well MW-3 that is not present in the other monitoring wells. The aquifer consists predominately of Pleistocene-Holocene

alluvial sediments flanking the east side of the Temblor Range that grade laterally eastward into finer-grained fluvial, deltaic, lacustrine, and flood basin deposits comprised predominately of silts and clay interbedded with sand layers.

Groundwater monitoring of the alluvial aquifer has been ongoing since 2003 when wells MW-1, MW-2, and MW-3 were installed. Wells MW-4 and MW-5 were installed in 2019 to supplement the monitoring system. MW-1, MW-2, and MW-3 were decommissioned and MW-1R and MW-2R were installed in 2024. The current monitoring well network consists of MW-1R, MW-2R, MW-4 and MW-5. Depth to groundwater data are sourced from the on-site monitoring wells, and the average depths to groundwater range from 62.9 to 80.2 feet bgs in wells MW-2R and MW-1, respectively. Groundwater flow direction and gradient for the facility are calculated using data for wells MW-1R, MW-2R, MW-4, and MW-5. The most recent groundwater contour map using the October 2025 data shows that groundwater flow is generally to the west-southwest at a gradient of 0.0008 or about 4.3 feet per mile.

The quality of groundwater in the Alluvial aquifer is poor with elevated chloride, total dissolved solids, nitrate, and boron.

The Facility is not located within a Federal Emergency Management Agency (FEMA)-designated 100-year Flood zone.

COMPOSTING OPERATIONS

The Facility is permitted to accept non-hazardous biosolids, manure, agricultural waste, green waste, and food waste. Most organic materials received for composting feedstocks are semi-solid or solid materials. Small quantities of liquid biosolids and food wastes are accepted to provide moisture for the composting process by constructing a dam of previously dried feedstocks for each load and immediately bulking to form a non-flowable material suitable for composting. The revised addendum to the Technical Report provides assurance that sub-class B biosolids would no longer be accepted by the facility.

The Facility produces agricultural soil amendments using two composting methods:

1. Windrow composting consisting of trapezoidal shaped linear piles on 28-foot centers ranging up to 1,100 feet in length depending on location.

2. Aerated static compost piles consisting of trapezoidal shaped linear piles with a base of 20 feet by 90 feet and covered with an expanded polytetrafluoroethylene engineered fabric cover anchored with plywood batons and cinder blocks serving both as a wind anchor and ground seal to contain foul air for volatile organic compound (VOC) removal.

FACILITY DESIGN

Working Surface

The General Order states that 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. Working surfaces must consist of one of the following:

a. Compacted soils, with a minimum thickness of one foot;
b. Asphaltic concrete or Portland cement concrete; or
c. An equivalent engineered alternative specified in an NOI and/or a technical report and approved by the Regional Water Board.

The General Order allows for the implementation of a groundwater protection monitoring program in lieu of meeting the working surface design requirements. The Discharger has elected to maintain their current groundwater monitoring network and continue groundwater monitoring. As previously stated, the groundwater monitoring network consists of four groundwater monitoring wells: MW-1R, MW-2R, MW-4, and MW-5.

Detention Ponds

The General Order states, detention ponds must be designed, constructed, operated, and maintained to meet a hydraulic conductivity of 1.0×10^{-6} cm/s or less. These ponds must include one of the following:

a. A liner system consisting of a 40 thousandths of an inch (mil) synthetic geomembrane (60-mil if high-density polyethylene), underlain by either one foot of compacted clay or a geosynthetic clay liner installed over a prepared base.
b. A liner system that includes Portland cement concrete – designed to minimize cracking and infiltration – underlain by a 40-mil synthetic geomembrane (60-mil if high-density polyethylene); or an equivalent engineered alternative specified in an NOI and/or a technical report and approved by the Regional Water Board.

In the 27 April 2026 revised addendum to the Technical Report, the Discharger proposes installing two lined surface impoundments and includes a water balance, design specifications and drawings, and a CQA plan for surface impoundment construction activities. The Technical Report proposes a phased approach to surface impoundment construction. The phased approach includes installing new surface impoundment 1-2 in the footprint of existing surface impoundments 1 and 2 by the end

of October 2026 and installing new surface impoundment 3 in the footprint of existing surface impoundment 3 by the end of October 2027. Further, existing surface impoundment 4 will be decommissioned and filled in with runoff from that area being routed to new surface impoundment 1-2. A water balance was conducted to ensure the design of the proposed surface impoundments could accommodate a 25-year, 24-hour storm in addition to normal seasonal precipitation. Proposed surface impoundment 1-2 has a design capacity of 27.8 acre-feet with two feet of freeboard, while surface impoundment 3 has a design capacity of 17.7 acre-feet.

The proposed design of the new lined surface impoundments from top to bottom is:

- 60-mil double-sided textured high density polyethylene (HDPE) geomembrane.
- Reinforced geosynthetic clay liner (GCL)
- 16-ounce per square yard nonwoven geotextile underdrain layer
- Prepared soil subgrade

The Technical Report proposes a 25-foot by 25-foot leak detection sump (i.e., pan lysimeter) under the low points of the new surface impoundments. The impoundment liner system will be continuous above the pan lysimeter and an additional 60-mil HDPE geomembrane and GCL will be installed beneath the pan lysimeter. The pan lysimeter's riser pipe in order to isolate the pan lysimeter from the surrounding environment. The proposed lined surface impoundments equipped with pan lysimeters meet the requirements of the General Order. An electrical leak location survey will be performed to verify the integrity of the completed composite liner system. The survey will be conducted following placement of the soil layer on the bottom of the impoundments. The test will be performed by an Electrical Leak Location Survey (ELLS) Firm under the supervision of the CQA Engineer in accordance with the technical specifications and CQA Plan. In addition to the ELLS, the CQA Plan includes plans for documenting construction activities, observations, testing, ELLS, changes to drawings or specifications if needed, geosynthetic quality control, and final reporting and certification for the surface impoundment construction activities.

MONITORING AND REPORTING

The Technical Report states that the Discharger will conduct a monitoring program as described in Attachment B of the General Order's Monitoring and Reporting Program (MRP). The *Annual Monitoring and Maintenance Report* must be submitted to the Central Valley Regional Water Quality Control Board (RWQCB) by April 1st of each year.

SITE CLOSURE

The Discharger will submit a written notice within 90 days of the site closure to the Central Valley Water Board. A 30-day of intent to perform site restoration will be provided to the Kern County Local Enforcement Agency (LEA).

RECOMMENDATIONS

Based on staff review of the Technical Report, addendum materials, and NOI, the proposed modifications to the Facility will meet the General Order requirements if constructed and operated as described in the Technical Report. It is recommended to issue the NOA with the stipulation that full compliance with the General Order design, construction, and operational requirements is met within the phased timeline included in the NOA.