

April 4, 2014

State Water Resources Control Board  
Office of Chief Counsel  
Jeannette L. Bashaw, Legal Analyst  
P.O. Box 100  
Sacramento, CA 95812-0100

**Subject: Water Quality Petition – Cleanup and Abatement Order R5-2014-0700**

Dear Ms. Bashaw:

We are filing this petition as a result of Cleanup and Abatement Order R5-2014-0700 issued by the Central Valley RWQCB that requires soil testing and material testing on our property. On September 24, 2014 a Notice of Violation was issued on the Jess Ranch for the discharge of hazardous waste, the discharge of waste out of character with that permit, and for the onsite storage of biosolids for a period of time in excess of that permitted. The Jess Ranch property and our property, although under different ownerships, are under the same WDR (R5-2006-0071).

As a result of the Notice of Violation on the Jess Property, and since our property is under the same WDRs, our property was inspected by RWQCB staff along with the Jesses property on January 7, 2014. During the inspection of our property it was noticed that there was soil spread out on the ground that contained a small amount of plastic bags and other contaminates.

Based on this inspection, our property was included in the Cleanup and Abatement Order and we are being required to perform testing on the soil and underlying soil. We have explained to the RWQCB staff that the soil was from a stock pond that was recently cleaned and was spread out to dry before being tilled into the soil.

Due to drought conditions the stock pond was beginning to dry up, and the muddy bottom became exposed. The muddy bottom was the result of silt building up over time in the pond. As a result of the mud in the pond two heads of cattle became stuck in the mud and died.

In order alleviate the problem with silt build-up in the pond we contacted the USDA National Resources Conservation Service (NRCS) office in Livermore and they conducted a conservation planning visit at our property on March 7, 2013 to discuss the desilting of the pond. The NRCS conducted a follow-up field visit to the site on March 18, 2014 and confirmed that the pond had been cleaned. Attached is the confirming email from the NRCS field representative that viewed the pond before and after the cleaning.

The pond was cleaned following the NRCS General Avoidance/Minimization Measures for pond cleaning/repairs. As described above, the silt material was transported from the pond to an adjacent

area where it was spread out to dry. In addition, once the material had dried we removed any contaminants that were large enough impact our cattle if they were to ingest the materials. My daughter and I removed two large garbage bags of debris from the area. The source of most of the debris is the Altamont Landfill which is located nearby. High winds in the Altamont pass area blow debris, particularly plastic bags on our property.

The cleaning of the pond was an integral part of their ranching operation and had nothing to do with the issues at the Jess Ranch. It does not seem to be reasonable to burden us with a costly abatement and cleanup order for something that was done as part of our normal cattle operation. Although the WDRs are still in force on the property, biosolids application ceased on the site in October of 2012. We longer have a contract Biosolids Recycling for biosolids application and no further applications will occur at the site. Unfortunately, due to the situation at the Jess Ranch, the RWQCB will not rescind the WDRs on our property until their issues are resolved.

We are requesting the Cleanup and Abatement Order be removed from our property due to the fact that no unauthorized waste was discharged on our property. We have made continued efforts to inform the RWQCB staff as to the source of the soil and also sent them a copy of the email from the NRCS. After the draft Order was issued, Mike Harding of Biosolids Recycling had several discussions with RWQCB staff as to the source of the soil, emailed a map showing the location of the pond, and also included an explanation in his February 20 2014 letter. Unfortunately, RWQCB staff did not believe that the source of the soil was from the pond cleaning and the final Order was issued on March 7, 2014.

A copy of this petition is also being sent the Regional Board representative assigned to this matter.

Sincerely,

Janice Marciel  
P.O. Box 2298  
Livermore, CA 94551  
925-784-0527  
janicemarciel@gmail.com

Fri, Mar 28, 2014 at 11:08 AM

**Aquino, Alyson - NRCS, Livermore, CA**

<Alyson.Aquino@ca.usda.gov>

To: JANICE MARCIEL <janicemarciel@gmail.com>

[Reply](#) | [Reply to all](#) | [Forward](#) | [Print](#) | [Delete](#) | [Show original](#)

Hi Janice,

Jackie is home today but asked if I could forward this response to you. She knew you were waiting on it and didn't want to delay it until next week.

Thanks!

Alyson

**FROM JACKIE:**

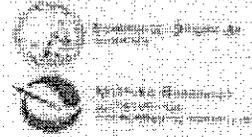
Hi Janice,

Yes - we did meet last year (3/7/13) for a conservation planning visit to the Altamont property. At that field visit you did discuss the need to desilt the pond by the corrals. We talked about the possibility of us including the project in your application, but you expressed that you guys needed to do it sooner than our contracting would allow. On our follow-up field visit a couple of weeks ago (3/18/14) - you showed me the pond (which had obviously been desilted) and the spoil pile area that you flattened out.

Hope this helps.

Best,

Jackie



**Central Valley Regional Water Quality Control Board**

7 March 2014

**CERTIFIED MAIL**  
7009 1410 0002 1422 2137

Mr. Michael Harding, President  
Biosolids Recycling, Inc.  
1116 Hastings Court  
Antioch, CA 94509

**CERTIFIED MAIL**  
7009 1410 0002 1422 2144

Mr. and Mrs. Joseph Jess  
5001 Oak Meadows Court  
Iano, CA 95640

**CERTIFIED MAIL**  
7009 1410 0002 1422 2151

Mr. and Mrs. Paul Marciel  
P.O. Box 2088  
Livermore, CA 94551

**CLEANUP AND ABATEMENT ORDER R5-2014-0700, JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES, ALAMEDA COUNTY**

In a 7 February 2014 letter, staff of the Regional Water Quality Control Board, Central Valley Region requested comments on a draft Cleanup and Abatement Order (CAO) issued to Biosolids Recycling, Inc., Joseph and Connie Jess, and Paul and Sally Marciel (hereafter Dischargers). Biosolids Recycling, Inc. submitted comments regarding the draft CAO in a 21 February 2014 letter, and on 3 March 2014, met with Regional Board staff to discuss the draft CAO. Upon review of the written comments and meeting with the Dischargers, staff have revised the draft CAO.

Enclosed is the signed Cleanup and Abatement Order R5-2014-0700. This Order has been prepared to address violations of the Waste Discharge Requirements as documented in the 24 September 2013 Notice of Violation and the 7 January 2014 Inspection Report. Specifically, this Order requires the Dischargers to do the following:

- **Immediately** - Cease all discharges to land not specifically authorized and conducted in accordance with WDRs Order R5-2005-0071.
- **Submit reports as outlined in the CAO.** The due dates contained in the CAO, and summarized in the table below, are final dates by which reports that comply with the Order must be submitted to avoid further enforcement action. However, to expedite compliance with the CAO, reports may be submitted sooner.

**Report Submittal Summary Table**

Report Type:	Date Due:
Site Security Technical Report	31 March 2014
February 2014 Monthly Monitoring Report	1 April 2014
All past due monthly, quarterly, and annual reports for the time period of February 2013 through January 2014	1 April 2014
Unauthorized Disposal Characterization Workplan	1 April 2014

Report Submittal Summary Table (cont.)

Report Type:	Date Due:
Quarterly Progress Reports (Due the 30 <sup>th</sup> day of the month following the end of each quarter)	by 30 April, 30 July, 30 October, and 30 January
Unauthorized Disposal Characterization Report	1 July 2014,
Groundwater Characterization Workplan (Conditional)	Within 30 days of Water Board Staff Notification
Unauthorized Waste Disposal Report	2 September 2014
Groundwater Assessment Report (Conditional)	24 October 2014
Groundwater Characterization Report (Conditional)	30 January 2015

If the Dischargers fail to comply with the provisions of this Order, the Assistant Executive Officer may refer this matter to the Attorney General for judicial enforcement or may issue a complaint for administrative civil liability. Failure to comply with this Order may result in the assessment of administrative civil liability up to \$10,000 per violation per day.

If you have any questions, please contact Paul Sanders at (916) 464-4817 or at psanders@waterboards.ca.gov.



HOWARD HOLD, P. G.  
Senior Engineering Geologist  
WDRs Compliance and Enforcement Unit

Enclosure: Cleanup and Abatement Order R5-2014-0700

cc w/ enc: Naomi Kaplowitz, Office of Enforcement, State Water Board, Sacramento  
Maria Mendoza, Alameda County Department of Environmental Health, Alameda

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

CLEANUP AND ABATEMENT ORDER R5-2014-0700  
FOR

BIOSOLIDS RECYCLING, INC.  
JOSEPH AND CONNIE JESS  
PAUL AND SALLY MARCIEL  
JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES  
ALAMEDA COUNTY

This Order is issued to Biosolids Recycling, Inc, Joseph and Connie Jess, and Paul and Sally Marciel (hereafter Dischargers) based on provisions of California Water Code section 13304, which authorizes the California Regional Water Quality Control Board, Central Valley Region, (hereafter Central Valley Water Board or Board) to issue a Cleanup and Abatement Order (CAO), and Water Code section 13267, which authorizes the Board to require the submittal of technical reports.

The Assistant Executive Officer of the Central Valley Water Board finds, with respect to the Discharger's acts, or failure to act, the following:

1. Biosolids Recycling, Inc. obtains and delivers biosolids to land application sites at the Jess and Marciel Ranches in eastern Alameda County, oversees biosolids application by the land owners, and performs monitoring and reporting related to the application of biosolids. The discharge of biosolids is currently regulated by Waste Discharge Requirements (WDRs) Order R5-2006-0071.
2. The Dischargers have been applying biosolids to land as a soil amendment at the Jess Ranch since 1992, and the Marciel Ranch since 1994, and the discharge has been permitted by four successive orders: Order 92-038, Order 93-181, Order 94-363, and Order R5-2006-0071.

VIOLATIONS OF ORDER R5-2006-0071 AND WATER CODE

3. This CAO focuses on violations of the Water Code and of WDRs Order R5-2006-0071, as previously documented in the Central Valley Water Board's 24 September 2013 Notice of Violation (NOV; found as Attachment A to this CAO) and the staff report documenting the 7 January 2014 Site Inspection (found as Attachment B to this CAO).
4. Discharge Prohibition A.9 of the WDRs states: *Discharge of waste classified as hazardous, as defined in Section 2521(a) of Title 23, CCR, Division 3, Chapter 15, Section 2510, et seq., (hereafter Chapter 15) or "designated" as defined in Section 13173 of the California Water Code, is prohibited.*
5. Discharge Specification D.1 of the WDRs states: *Biosolids shall not be stored directly on the ground at any location for more than seven consecutive days.*
6. Discharge Specification D.2 of the WDRs states: *Biosolids staged or stored on-site for more than 24 hours shall be covered.*
7. Provision G.3 of the WDRs states, in part: *The Dischargers shall comply with Monitoring and Reporting Program No. R5-2006-0071...* The Monitoring and Reporting Program requires that monitoring reports be submitted on a monthly, quarterly, and annual schedule.

CLEANUP AND ABATEMENT ORDER R5-2014-0700  
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JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES  
ALAMEDA COUNTY

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8. Provision G.4 of the WDRs states, in part: *The Dischargers shall comply with the "Standard Provisions and Reporting Requirements for Waste Discharge Requirements", dated 1 March 1991, which are attached hereto and by reference as part of this Order...*
9. Standard Provisions section A.4 states, in part: *Before making a material change in the character, location, or volume of discharge, the discharger shall file a new Report of Waste Discharge with the Regional Board...*
10. Water Code Section 13260 states, in part: *(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information that may be required by the regional board: (1) A person discharging waste, or proposing to discharge waste, within any region of that could affect the quality of the waters of the state...*
11. On 11 July 2013, the Alameda County Department of Environment Health received a phone call regarding the possible illegal disposal of about 30,000 gallons of wastewater at the Dischargers site. After investigation by the County and Central Valley Water Board staff, on 24 September 2013, Board staff issued a Notice of Violation (NOV) for the following discharges:
  - a. The discharge of 36,000 gallons of liquid waste with a pH less than or equal to 2, which constitutes a hazardous waste. The discharge is a violation of Prohibition A.9 of the WDRs. This material was discharged into the Biosolids Pit, as shown on Attachment C to this CAO.
  - b. The discharge of 36,000 gallons of liquid hazardous waste and 26,800 gallons of liquid car wash cleanout waste, which is a considerably different type of waste than the discharge of biosolids permitted under the WDRs. The discharge of this non-permitted waste is a violation of Section A.4 of the WDR's Standard Provisions, and of Water Code section 13260. According to the Dischargers, the liquid hazardous waste was discharged into the Biosolids Pit as shown in Attachment C, and the liquid car wash cleanout waste was discharged into the Eastern Basin as shown in Attachment C.
  - c. The storage of 400 tons of uncovered biosolids (hereafter referred to as the Biosolids Stockpile) atop native soil for almost two years, in violation of Sections D.1 and D.2 of the WDRs. The location of the Biosolids Stockpile is shown in Attachment C.
12. The following additional violations of the WDRs were noted in the staff report documenting the 7 January 2014 Site Inspection. All of these discharges are a violation of Section A.4 of the WDR's Standard Provisions and of Water Code section 13260.
  - a. The placement of an undocumented and uncharacterized stockpile (Eastern Stockpile) in the Eastern Basin. The locations of the Eastern Basin and the Eastern Stockpile are shown on Attachment C.
  - b. The placement of an undocumented and uncharacterized stockpile from the site's former horse stables (Southern Stockpile), just southeast of the Eastern Basin. The location of the Southern Stockpile is shown on Attachment C.
  - c. The disposal of undocumented and uncharacterized soil containing visible trash, including plastic and fiberglass, (M-7 Waste Soil) across section M-7 of the Marciel Ranch. The location of the M-7 Waste Soil is shown on Attachment C.

13. WDRs Order R5-2006-0071 requires monthly, quarterly and annual reporting. However, as of February 2014, the last report received by the Central Valley Water Board was the January 2013 monthly monitoring report, received on 4 February 2013. No subsequent monitoring reports have been received. As of February 2014, the Dischargers should have submitted the February 2013, through December 2013 monthly monitoring reports, the First through Fourth Quarter 2013 reports, and the 2013 Annual Report. Failure to submit the monitoring reports is a violation of the WDRs.
14. The 24 September 2013 NOV required the Dischargers to submit a report containing: (a) documentation that all discharges of non-permitted waste had stopped, (b) if biosolids disposal were to continue in the future, a description of how biosolids would be disposed, (c) documentation of the fate of the remaining Biosolids Stockpile, (d) documentation of the permitted discharges of waste that occurred in 2013, (e) information regarding the date, source and/or makeup of the hazardous and car wash waste discharges, and (f) a workplan to assess soil and groundwater conditions beneath each unauthorized discharge area.
15. The Dischargers' 12 November 2013 response stated that no permitted discharges of waste had occurred since November 2012, that they were now using landfills or other subcontractors to dispose of biosolids, and that no other onsite discharges were planned, with the exception of the disposal of the remaining Biosolids Stockpile. The Dischargers requested that the WDRs be rescinded. In addition, the Dischargers' response contained a map showing the location of each unauthorized discharge, provided the date, origin, and volume of each discharge, and contained sampling results from the hazardous waste discharge. No samples were obtained from the car wash waste prior to disposal. The Dischargers' response contained a workplan to collect a limited number of samples from both the Biosolids Stockpile and beneath this pile and the liquid car wash waste disposal area (Eastam Basin). However, the work plan was insufficient to adequately characterize the remaining biosolids pile or soil and groundwater beneath the unauthorized discharge areas. Additionally, the scope of the originally requested workplan must now be expanded to address illegal discharges observed during the 7 January 2014 Site Inspection.
16. The corrective action measures required by this CAO are necessary to:
  - a. Address the violations noted in the 24 September 2013 NOV.
  - b. Address the violations noted during the 7 January 2014 Site Inspection.
  - c. Address the Dischargers' failure to submit required reports, and
  - d. Ensure that no regulatory concerns remain before the Central Valley Water Board considers whether to grant the Dischargers' request to rescind the WDRs.

#### REGULATORY CONSIDERATIONS

17. The WDRs do not include provisions to protect water quality from the discharge of the types of waste described in Findings 11 and 12 of this CAO. The Dischargers' Report of Waste Discharge did not discuss the wastes described in Findings 11 and 12, nor did it include an anti-degradation analysis for their discharge. The discharge of hazardous waste, discharge of waste not in character with that authorized by WDRs Order R5-2006-0071, the improper storage of biosolids, and storage of uncharacterized waste piles atop native soil are all violations of WDRs Order

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BIOSOLIDS RECYCLING, INC  
JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES  
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- R5-2006-0071, and threaten to cause, or have caused, pollution or nuisance. By discharging prohibited wastes and by improperly storing biosolids and uncharacterized waste piles, the Dischargers have caused or permitted, or threaten to cause or permit, waste to be discharged in such a manner that it threatens to cause, or has caused, a threat to public health and/or created a condition of pollution or nuisance. These actions subject the Discharger to an Order under Section 13304 of the California Water Code.
18. The *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fourth Edition* (hereafter Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation plans and policies for protecting waters of the basin, and incorporates by reference plans and policies adopted by the State Board. These requirements implement the Basin Plan.
  19. Surface water drainage is to Mountain House Creek, which is tributary to Old River in the Sacramento San Joaquin Delta, which are waters of the United States. The beneficial uses of the Sacramento San Joaquin Delta are municipal and domestic supply; agricultural supply; industrial supply; water contact recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; migration of aquatic organisms; spawning reproduction and/or early development; wildlife habitat; and navigation.
  20. The beneficial uses of the underlying groundwater are municipal and domestic supply, agricultural supply, industrial service supply, and industrial process supply.
  21. Water Code section 13304(a) states, in relevant part: *Any person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.*
  22. Water Code section 13267(b) states, in relevant part: *In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region ... shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring these reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.*
  23. The technical reports required by this CAO are necessary to ensure compliance with this CAO and WDRs Order R5-2006-0071, and to ensure the protection of water quality. The Dischargers own and/or operate the facility that discharges waste subject to this CAO and WDRs Order R5-2006-0071. The burden, including costs, of producing the technical reports, many of which were already required as a condition of the Dischargers' operations, is far outweighed by the need

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of the reports in ensuring compliance with the WDRs Order R5-2006-0071 and ensuring the protection of water quality.

24. The issuance of this Order is an enforcement action taken by a regulatory agency and is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) pursuant to California Code of Regulations, title 14, section 15321(a)(2).

IT IS HEREBY ORDERED, pursuant to Water Code sections 13304 and 13287 of the California Water Code, that Biosolids Recycling, Inc. Joseph and Connie Jess, and Paul and Sally Marciel shall cleanup and abate the Jess Ranch and Marciel Ranch Biosolids Application Sites in accordance with the scope and schedule set forth below.

1. The Dischargers shall immediately cease all discharges to land not specifically authorized and conducted in accordance with WDRs Order R5-2006-0071. By 31 March 2014, the Dischargers shall submit a *Site Security Technical Report* describing how they will ensure that only the wastes authorized by WDRs Order R5-2006-0071 are applied to the land in the manner allowed by the WDRs, and how they will ensure that non-permitted wastes are not brought onto or disposed at the site.
2. The Dischargers shall immediately comply with all aspects of WDRs Order R5-2006-0071, including monthly, quarterly, and annual reporting, and all applicable provisions of the Water Code that are not specifically referred to in this Order. The February 2014 monthly monitoring report is to be submitted by 1 April 2014, and all subsequent reports required by the WDRs are to be submitted as required. Even if there is no discharge during a month, the Dischargers must still submit a monthly monitoring report.
3. By 1 April 2014, the Dischargers shall submit all past due monthly, quarterly, and annual reports for the time period of February 2013 through January 2014, documenting all work, monitoring, and sampling required by the WDRs. These past due reports may be combined into a single report, so long as the information is arranged in a manner that clearly show the results of all monitoring and reporting required by the WDRs.
4. By 1 April 2014, the Dischargers shall submit an *Unauthorized Disposal Characterization Workplan* adequate to determine the nature of the Biosolids Stockpile, the Eastern Stockpile, the Southern Stockpile, and the M-7 Waste Soil. The workplan must also contain a proposal to assess the nature of the native soil beneath the Biosolids Stockpile, the Eastern Stockpile, the Southern Stockpile, and beneath the hazardous waste and liquid car wash waste discharge areas. At a minimum, this *Workplan* shall contain:
  - a. Source of Waste. Documentation regarding the origin, volume, and date of placement for each of the three stockpiles and the M-7 Waste Soil. Include manifests and contact information for each generator of the waste.
  - b. Samples of Waste. A proposal to collect and analyze a minimum of one soil sample for every 50 cubic yards of material contained within the three stockpiles and the M-7 Waste Soil. Samples are to be collected in a grid pattern across each of the three stockpiles and from different depths within each stockpile. Samples collected from the M-7 Waste Soil (which has been spread across section M-7 of the Marciel Ranch) shall be collected to the maximum

depth of the lift, and to the maximum extent possible, each samples shall be collected from the M-7 Waste Soil and not from the native soil atop which the M-7 Waste Soil was placed.

5. c. Samples beneath Waste. A proposal to collect and analyze a minimum of two depth-discreet samples, from native soil about one and three feet below ground surface (bgs), from sampling locations proposed in a grid pattern laid out across: 1) the Biosolids Pit, 2) the Eastern Basin, and 3) the Southern Stockpile. A minimum of five sampling locations are to be proposed across the Biosolids Pit, a minimum of five sampling locations are to be proposed across the Southern Stockpile, and a minimum of 10 sampling locations are to be proposed across the Eastern Basin.
5. d. Maps. Scaled maps and/or air-photos showing the grid pattern and each proposed sampling location superimposed atop each stockpile and area to be assessed, as discussed in items 4b and 4c above.
5. e. Analytical Methods, Biosolids Pit. A proposal to analyze all soil samples obtained from the Biosolids Stockpile and native soil beneath the Biosolids Pit for each constituent/parameter outlined in the "Biosolids Monitoring" and "Post-Application Soil Monitoring" sections in MRP R5-2006-0071, with the exception of percent moisture, soil classification, and total solids.
5. f. Analytical Methods, Eastern and Southern Stockpiles. A proposal to analyze all soil samples obtained from the Eastern Stockpile, the Southern Stockpile, and the native soil beneath the Eastern Basin and Southern Stockpile for volatile organics by EPA Method 8260, the CAM 17 metals, and each constituent/parameter outlined in the "Biosolids Monitoring" and "Post-Application Soil Monitoring" sections in WDRs Order R5-2006-0071, with the exception of percent moisture, soil classification, and total solids.
5. g. Analytical Methods, M-7 Waste Soil. A proposal to analyze all soil samples obtained from the M-7 Waste Soil for each constituent/parameter outlined in the "Post-Application Soil Monitoring" section in WDRs Order R5-2006-0071, with the exception of soil classification, and total solids.
5. h. Background Samples, Biosolids, Eastern, Southern Stockpiles. A proposal to collect a minimum of three separate background samples from the Jess Ranch property near the Biosolids, Eastern, and Southern Stockpiles, but outside of any known biosolids application area. Each sample collected shall be analyzed for the same constituents/parameters as outlined in Item 4f above.
5. i. Background Samples, M-7 Waste Soil. A proposal to collect a minimum of one background sample from the Marciel Ranch property just above (topographically) from the M-7 Waste Soil. Each sample collected shall be analyzed for the same constituents/parameters as outlined in Item 4g above.
5. j. Soil Sampling and Analysis Plan (SAP). A SAP shall be included as an appendix to the workplan and shall contain information as listed in Section G of Attachment D of this Order. Upon approval, the SAP shall be utilized as a guidance document that is referred to by individuals responsible for conducting soil sampling activities.

5. c.

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5. By 1 July 2014, the Discharger shall submit an *Unauthorized Disposal Characterization Report* containing the following minimum information:
  - a. The results of the work required by Item 4, as approved by Central Valley Water Board staff.
  - b. Based on the analytical data collected pursuant to Item 4, include (i) a proposal to properly dispose of each remaining three soil stockpiles, and (ii) a proposal to address, and if necessary, remove and properly dispose of the M-7 Waste Soil. If onsite land application is selected for the disposal of the M-7 Waste Soil, or any of the three stockpiles remaining on the Jess Ranch, all applicable loading rates and monitoring and reporting requirements as outlined in the WDR must be discussed and complied with for each proposed discharge.
  - c. A table comparing the analytical results of the background soil samples to the results of the M-7 Waste Soil, samples collected from the three remaining soil piles, and the results of the samples collected from native soil beneath the Biosolids Pit, the Eastern Basin, and the Southern Stockpile.
  - d. Based on the analytical data collected pursuant to Items 4e through 4i and the table required by Item 5c above, provide a discussion as to whether or not the groundwater has the potential to be impacted due to the discharge of unauthorized waste.
6. If Central Valley Water Board staff determines that the unauthorized waste discharge has potentially impacted groundwater, then within 30 days of notification, the Discharger shall submit a *Groundwater Characterization Workplan*. At a minimum, this *Workplan* shall contain:
  - a. A proposal to collect a minimum of one groundwater sample, from first encountered groundwater, beneath each area identified by Central Valley Water Board staff as potentially impacted.
  - b. A proposal to collect a minimum of one groundwater sample where the Dischargers believe a representative background groundwater sample can be obtained. If potential impacts to waters of the State are identified on both the Jess and Marciel Ranches, then separate background samples will be required on each property.
  - c. The information as listed in sections A through F in Attachment D to this Order along with a rationale for the proposed number of sampling locations and their placement. Groundwater samples may be obtained using either one-time grab groundwater sampling techniques, or by installing standard groundwater monitoring wells. However, should only grab groundwater samples be collected, and analytical results from these samples show that groundwater has been impacted by site operations/discharges, a network of groundwater monitoring wells adequate to define and abate the impact will be required. Additionally, should the analytical results of any grab groundwater sample obtained not be adequate to determine whether or not the discharge has caused impact (i.e. due to quality assurance/control or detection limit issues), then additional sampling will be required.
  - d. A proposal to analyze each groundwater sample obtained for each constituent outlined in the "Groundwater Monitoring" section in WDRs Order R5-2008-0071, as well as pH, electrical conductivity, volatile organics by EPA Method 8260, semi-volatiles by EPA Method 8270, PCB (arochlors), aldrin, dieldrin, and Total Kjeldahl Nitrogen.

- e. A groundwater Sampling and Analysis Plan (SAP). The SAP shall be included as an appendix to the workplan and shall contain information as listed in Section G of Attachment D. Upon approval, the SAP shall be utilized as a guidance document that is referred to by individuals responsible for conducting groundwater sampling activities.
7. By 2 September 2014, the Dischargers shall submit an *Unauthorized Waste Disposal Report* documenting that the waste in each stockpile and if necessary, the M-7 Waste Soil, have been properly disposed as approved by Central Valley Water Board staff. The report shall document that the waste piles have been removed to the extent that the remaining soil is consistent with background concentrations.
  8. If required by Item 6, then by 24 October 2014, the Dischargers shall submit a *Groundwater Assessment Report* documenting groundwater sampling results, and containing the following:
    - a. The results of the work required by Item 6 above, as approved by Central Valley Water Board staff. The results shall be tabulated and the report shall include a discussion regarding the results obtained.
    - b. If any constituent is detected in groundwater above background, then this report shall contain a proposal to install a network of permanent groundwater monitoring wells adequate to define the extent of the groundwater impacts. The monitoring well installation proposal shall contain information as listed in section A through F of Attachment D to this Order.
  9. If required by Item 8.b above, then by 30 January 2015, the Dischargers shall submit a *Groundwater Characterization Report* documenting the installation and sampling of a permanent groundwater monitoring well network as approved by Central Valley Water Board staff. This report must also contain an engineering feasibility study to remediate the waste identified in groundwater.
  10. Beginning with the first quarter 2014, the Discharger shall submit quarterly progress reports describing the work completed to date to comply with each of the above requirements, as well as what work will be conducted in the next quarter. The Quarterly Progress Reports shall be submitted by the 30<sup>th</sup> day of the month following the end of the quarter (e.g. by 30 April, 30 July, 30 October, and 30 January).

As required by the California Business and Professions Code sections 6735, 7835, and 7835.1, all reports shall be prepared by, or under the supervision of, a California Registered Engineer or Professional Geologist and signed by the registered professional.

Any person signing a document submitted under this Order shall make the following certification:

*"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my knowledge and on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."*

if the Discharger is unable to perform any activity or submit any document in compliance with the schedule set forth herein, or in compliance with any work schedule submitted pursuant to this Order and approved by the Assistant Executive Officer, the Discharger may request, in writing, an extension of the

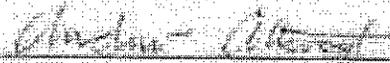
CLEANUP AND ABATEMENT ORDER R5-2014-0700  
BIOSOLIDS RECYCLING, INC.  
JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES  
ALAMEDA COUNTY

time specified. The extension request shall include justification for the delay. Any extension request shall be submitted as soon as a delay is recognized and prior to the compliance date. An extension may be granted by revision of this Order or by a letter from the Assistant Executive Officer.

If the Discharger fails to comply with the provisions of this Order, the Assistant Executive Officer may refer this matter to the Attorney General for judicial enforcement or may issue a complaint for administrative civil liability. Failure to comply with this Order may result in the assessment of administrative civil liability up to \$10,000 per violation per day, pursuant to the. The Central Valley Water Board reserves its right to take any enforcement actions authorized by law. Water Code sections 13268, 13350, and/or 13365.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

This Order is effective upon the date of signature.

  
\_\_\_\_\_  
Andrew Atevoigt, Assistant Executive Officer

3/7/14  
\_\_\_\_\_  
(Date)

- Attachment A: 24 September 2013 Notice of Violation
- Attachment B: 7 January 2014 Inspection Report
- Attachment C: Jess Ranch Stockpile, Basin and Investigation Area Map
- Attachment D: Soil Boring/Well Installation and Sampling Guide

OCT 3, 2012  
NOV. 26, 2012  
A-1  
SEPTIC  
TANK REPAIRS



Central Valley Regional Water Quality Control Board

24 September 2013

CERTIFIED MAIL  
7012 0470 0000 9904 1112

Mr. Michael Harding, President  
Biosolids Recycling, Inc.  
1118 Hastings Court  
Antioch, CA 94509

CERTIFIED MAIL  
7012 0470 0000 9904 1128

Mr. and Mrs. Joseph Jess  
15850 Jess Ranch Road  
Tracy, CA 95377

CERTIFIED MAIL  
7012 0470 0000 9904 1138

Mr. and Mrs. Paul Marciel  
P.O. Box 2088  
Livermore, CA 94551

**NOTICE OF VIOLATION FOR NONCOMPLIANCE WITH WASTE DISCHARGE REQUIREMENTS, JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES, ALAMEDA COUNTY**

The disposal of waste at the Jess Ranch and Marciel Ranch Biosolids Application Sites in Alameda County (Site) is regulated by Waste Discharge Requirements (WDRs) Order R5-2006-0071. Biosolids Recycling, Inc. obtains and delivers biosolids to the Site, oversees the application of biosolids by land owners, and performs monitoring and reporting related to biosolids at the Site. The Jess Ranch is owned by Joseph and Connie Jess, and the Marciel Ranch is owned by Paul and Sally Marciel. Collectively, Biosolids Recycling, Inc., Joseph and Connie Jess and Paul and Sally Marciel, are named as responsible parties (Dischargers) in WDRs Order R5-2006-0071.

On 11 July 2013, the Alameda County Department of Environment Health received a phone call regarding the possible illegal disposal of about 30,000 gallons of wastewater at the Site by A1 Septic Tank Service. According to the caller, the wastewater came from the clean out of several above ground tanks at 6645 Las Positas Road in Livermore. Records obtained from A1 Septic by Alameda County indicated that on 4 and 5 June 2013, 12 loads of about 3,000 gallons each, for a total of 36,000 gallons of wastewater, were sent to the Jess Ranch for disposal. The waste is believed to have consisted of water and food grade ink, however, no records were provided to document the nature of the waste discharged.

On 13 July 2013, Alameda County conducted a Site inspection during which they recorded saturated ground near the southeastern limit of the property, a white/grayish powdery material on the ground in the bermed area, and a stockpile of about 400 tons of uncovered biosolids. According to Mr. Harding, the biosolids pile was stockpiled at the Site over a year ago. Additionally, during this inspection, Mr. Harding stated that with permission from Joseph and Connie Jess, that A1 Septic had also been disposing of wash water and sediment, generated from the clean-up of car wash stations, at the Jess Ranch.

In a 21 August 2013 letter, Biosolids Recycling, Inc. notified staff of the Central Valley Water Board that the 36,000 gallons of liquid waste discharged to the Jess Ranch on 4 and 5 June 2013 had a pH between 1.69 and 2.21. Biosolids Recycling, Inc. also stated that the Jesses will no longer be accepting any regulated materials at their Site, and that the Dischargers would like to have their WDRs rescinded as soon as possible.

### Violations

Based on information provided by both Alameda County and Biosolids Recycling, Inc, Central Valley Water Board staff find that the Dischargers are in violation of WDRs R5-2006-0071 as follows:

1. The discharge of liquid waste with a pH less than or equal to 2, which constitutes a hazardous waste, is in violation of Section A.9 of WDRs R5-2006-0071, which states:

*Discharge of waste classified as hazardous, as defined in Sections 2521(a) of Title 23, CCR, Division 3, Chapter 15, Section 2510, et seq., (hereafter Chapter 15), or 'designated', as defined in Section 13173 of the California Water Code, is prohibited.*

2. The 36,000 gallons of hazardous waste and the car wash cleanout waste discharged to the Site are considerably different than the biosolid waste permitted under WDRs R5-2006-0071. Therefore, these discharges constitute a change in the character of the waste disposed, and are in violation of Section A.4 of the Standard Provisions, which states in part:

*Before making a material change in the character, location, or volume of discharge, the discharger shall file a new Report of Waste Discharge with the Regional Board...*

3. The storage of 400 tons of uncovered biosolids at the Site for over a year is in violation of Section D.1 and D.2 of WDRs R5-2006-0071, which state:

*D.1 - Biosolids shall not be stored directly on the ground at any location for more than seven consecutive days.*

*D.2 - Biosolids staged or stored on-site for more than 24 hours shall be covered.*

Additionally, Finding 46 of WDRs R5-2006-0071 states in part:

*If the Dischargers elect to operate a long-term biosolids storage facility on-site, that facility will require a separate Order pursuant to Title 27, GCR.*

### Required Response

Therefore, by 25 October 2013, the Dischargers shall submit a report that:

- Asserts that all discharges to the Site have stopped, and that no additional waste will be discharged to either the Jess or Marciel Ranches.
- Describes how Biosolids Recycling Inc. will dispose of biosolids in the future.
- Contains records documenting all discharges to the Site throughout 2013, as required by MRP No. R5-2006-0071.
- Contains records documenting both the source and makeup of the 36,000 gallons of hazardous waste disposed at the Site in June 2013.
- Contains a statement and map indicating where the 36,000 gallons of hazardous waste was disposed at the Site in June 2013.

- Contains records documenting the date, volume and location of each car wash cleanup waste discharge to the Site. These records must also contain any sampling data obtained from the car wash wastewater prior to its disposal at the Site.
- Documents the fate of the 400 cubic yards of biosolids stockpiled at the Site. If the biosolids were transported offsite for disposal, disposal receipts are to be included in the report. If the biosolids were applied to land permitted by the WDRs, describe how and where they were applied.
- Contains a work plan to assess soil and groundwater conditions beneath the units to which the 36,000 gallons of hazardous waste was disposed in June 2013, and the car wash waste was disposed.

Any technical report required herein that involves planning, investigation, evaluation, engineering design, or other work requiring interpretation and proper application of engineering or geologic sciences shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1. As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.

Only after the violations identified in this letter are adequately addressed to ensure that discharges of waste at the Site have and will not pose a threat to human health and waters of the State, can Central Valley Water Board staff consider your request to resend WDRs R5-2006-0071.

The Central Valley Water Board expects that the Dischargers will comply with all requirements of the WDRs and will not accept any wastes which are not permitted under the WDRs. We will evaluate your submittals in considering whether to propose issuance of an administrative civil liability complaint. Be advised that failure to operate the facility as described in Waste Discharge Requirements Order R5-2006-0071 may result in additional enforcement actions. If you have any questions regarding this Notice of Violation, please contact Paul Sanders at (916) 464-4817 or by email at [psanders@waterboards.ca.gov](mailto:psanders@waterboards.ca.gov).

*Original signed by*

HOWARD HOLD, PG  
Senior Engineering Geologist  
WDRs Compliance and Enforcement Unit

cc: Maria Mendoza, Alameda County Department of Environmental Health, Alameda

Violations # 988302, 855363



Central Valley Regional Water Quality Control Board

28 January 2014

Mr. Michael Harding, President  
Biosolids Recycling, Inc.  
1116 Hastings Court  
Antioch, CA 94509

Mr. and Mrs. Joseph Jess  
15850 Jess Ranch Road  
Tracy, CA 95377

Mr. and Mrs. Paul Marciel  
P.O. Box 2088  
Livermore, CA 94551

**INSPECTION REPORT, JESS RANCH AND MARCIEL RANCH BIOSOLIDS APPLICATION SITES, WASTE DISCHARGE REQUIREMENTS ORDER R5-2006-0071, ALAMEDA COUNTY**

The disposal of waste at the Jess Ranch and Marciel Ranch Biosolids Application Sites in Alameda County (Site) is regulated by Waste Discharge Requirements (WDRs) Order R5-2006-0071. Biosolids Recycling, Inc. obtains and delivers biosolids to the Site, oversees the application of biosolids by the land owners, Mr. and Mrs. Joseph Jess and Mr. and Mrs. Paul Marciel, and performs monitoring and reporting required by the WDRs.

On 24 September 2013, a Notice of Violation (NOV) was issued to Biosolids Recycling, Inc. and the Site's property owners for the discharge of hazardous waste, the discharge of waste out of character with that permitted, and for the onsite storage of biosolids for a period of time in excess of that permitted. In response to the NOV, Biosolids Recycling, Inc. submitted a 12 November 2013 report/workplan, in which they requested that the WDRs be rescinded.

To assess Site conditions prior to providing comments on the report/workplan, Central Valley Water Board staff conducted an inspection of the Site on 7 January 2014. A copy of this Inspection Report is attached. Based on staff observations made during the inspection and the tasks proposed in the report/workplan to address the NOV, staff has recommended that a Cleanup and Abatement Order (CAO) be prepared. A draft copy of the CAO will be sent shortly for your review and comment.

If you have any questions regarding please contact Paul Sanders at (916) 464-4817 or by email at psanders@waterboards.ca.gov.

*Original signed by*

PAUL SANDERS, P.G.  
Engineering Geologist  
WDR Compliance and Enforcement Unit

Enclosures: 7 January 2014 Site Inspection Report

cc: Marie Mendoza, Alameda County Department of Environmental Health, Alameda

CIWQS Inspection ID: 14577601

## CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

### INSPECTION REPORT

DATE: 7 January 2014

LOCATION & COUNTY: Jess and Marciel Ranch Biosolids Application Sites, Alameda County

CONTACT(S): Michael Harding, President, Biosolids Recycling, Inc.

INSPECTION DATE: 7 January 2014

INSPECTED BY: Paul Sanders, Central Valley Regional Water Quality Control Board

ACCOMPANIED BY: Michael Harding, President, Biosolids Recycling, Inc.

#### OBSERVATIONS AND COMMENTS

The disposal of waste at the Jess Ranch and Marciel Ranch Biosolids Application Sites in Alameda County (Site) is regulated by Waste Discharge Requirements (WDRs) Order R5-2006-0071. Biosolids Recycling, Inc. obtains and delivers biosolids to select application areas on both the Jess and Marciel Ranches, oversees biosolids application by the land owners, and performs monitoring and reporting related to requirements in the WDRs. The application of biosolids began at the Jess and Marciel Ranches in 1992 and 1994, respectively. According to Mr. Harding, the last land application of biosolids occurred in November 2012, and once the remaining 400 tons of stockpiled biosolids is disposed, no additional applications will occur.

The primary purpose of this inspection was to observe Site conditions prior to responding to Biosolids Recycling, Inc.'s 12 November 2013 report/workplan. The report/workplan was submitted in response to a 24 September 2013 Notice of Violation (NOV) issued to Biosolids Recycling, Inc. and the application area land owners by the Central Valley Water Board. The NOV outlined three specific WDR violations:

- 1) The discharge of liquid waste with a pH less than or equal to 2.
- 2) The discharge of liquid waste not in character with that permitted under the WDR; and
- 3) The onsite storage of 400 tons of uncovered biosolids.

Figures 1 through 3 show the 400 tons of stockpiled biosolids that remain at the Site. The stockpile is located in a deep pit cut into the western biosolids containment basin, and it was into this pit that the low pH waste water was discharged, as explained in the NOV. According to Mr. Harding, two containment basins, eastern and western basins, were constructed in the early 1990's, when the application of biosolids first began at the Site. The two basins were used to contain biosolids prior to application.

Figure 4 shows an area, located just north of the eastern containment basin within Drainage Area J-7, where Mr. Harding would like to dispose of the remaining 400 tons of biosolids, should future analytical results show that the remaining biosolids are acceptable for land application. Additional assessment of the biosolids stockpile is required prior to land application due to the discharge of low pH waste water into the stockpile.

Figures 5, 6, and 7 show section of the eastern basin, where the car wash waste water was discharged. A large stockpile of soil is present in the eastern basin. Additionally, as seen in Figure 8, a soil stockpile was also observed just south of the eastern basin. According to

Mr. Harding, the waste pile located just outside and south of the eastern basin are associated with the Site's former horse stables, which are no longer in use.

Combined Figures 3, 9, and 10 show most of the open land area within the western basin. In addition to the 400 tons of biosolids stored in this basin, sections of it are also used to store farm equipment, hay, and old wood trusses.

The dashed red lines on the attached map show the approximate course driven during this inspection. With the exception of some recently spread soil with trash on the Marciel Ranch property, as seen in Figures 11 through 16, no recent application of biosolids appear to have occurred at the Site.

During this inspection Mr. Harding also stated that about 400 acres of the Jess Ranch was sold about two years ago to the local water district, and that the remaining Jess Ranch consists of only about 160 acres. Subsequently, the Jess's only retain control over one of the seven former Jess Ranch Drainage Areas, Section J-7.

#### SUMMARY:

Regional Water Board staff noted four areas of concern with the Site during this inspection:

- 1) The onsite storage of 400 tons of uncovered biosolids in the western basin (Figures 1, 2, and 3). This soil will require assessment and proper disposal based on analytical results.
- 2) The placement of a large undocumented soil stockpile in the eastern basin (Figures 5 and 6). The source of this soil stockpile must be provided and the soil within this stockpile will require assessment and proper disposal based on analytical results.
- 3) The placement of a soil stockpile south of the eastern basin, (Figure 8). This soil will require assessment and proper disposal based on analytical results.
- 4) The disposal of soil containing trash spread across a section of the Marciel Ranch property (Figures 11 through 16). The source of this soil must be provided and the soil will require sampling to assess proper disposal options based on analytical results.

Biosolids Recycling, Inc. has stated that no permitted application of biosolids has occurred at the Site since November 2012. They also stated that they do not plan any additional discharges, after the disposal of the remaining 400 tons of biosolids occurs.

Because the discharge of biosolids will no longer occur after the disposal of the remaining 400 tons of uncovered biosolids, the Discharger has requested that their WDRs be rescinded. However, before Central Valley Water Board staff can recommend the WDRs be rescinded, each area of concern outlined above, as well as those outlined in the 24 September 2013 NOV, must be adequately addressed.

Civil Inspection ID: 14377651

PAUL SANDERS, P.G.  
Engineering Geologist  
Title 27 Compliance and Enforcement

APPROVED \_\_\_\_\_

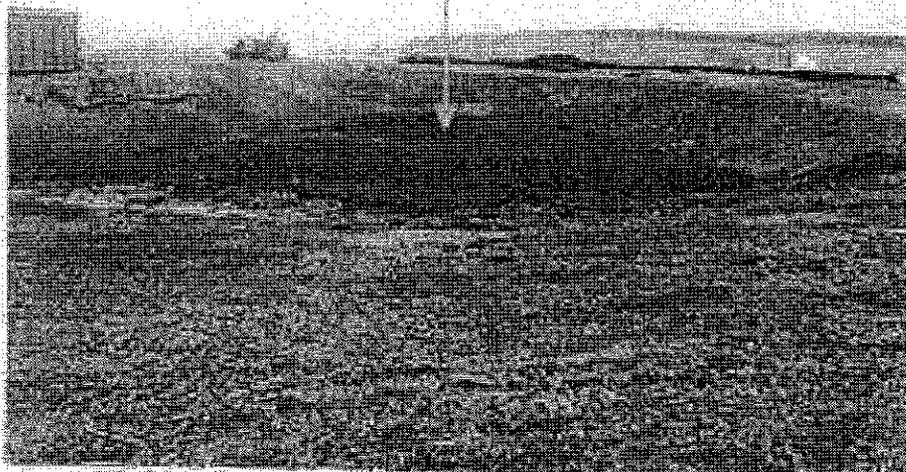


Figure 1  
Looking south at 400 tons of biosolids (red arrow) that remain in a pit within the Site's western containment basin.

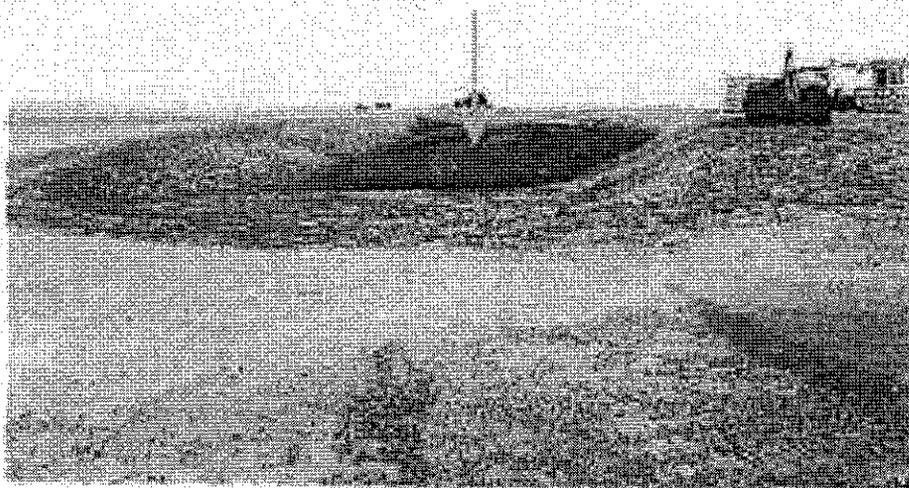


Figure 2  
Looking north at the 400 tons of biosolids (red arrow) that remain in a pit within the Site's western containment basin.

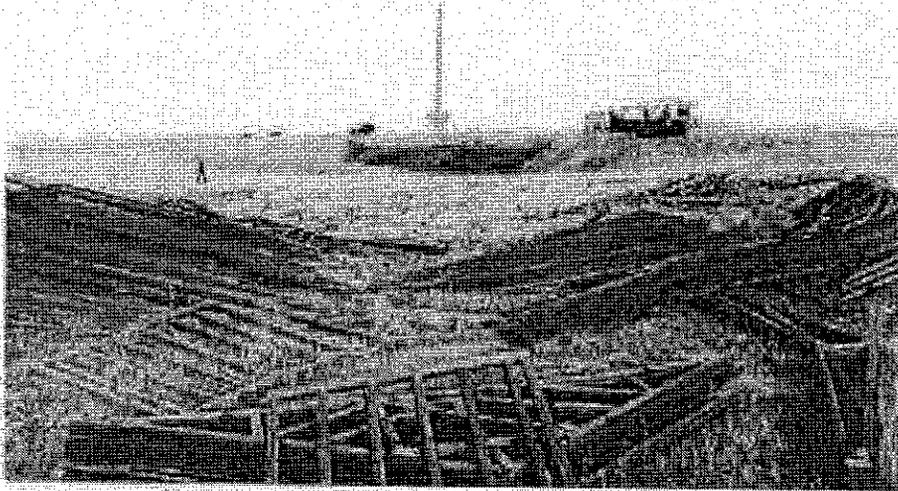


Figure 3

Standing near the southeastern end of the western containment basin looking north at the remaining biosolids stockpile, red arrow.



Figure 4

Standing just north of the remaining biosolids stockpile, looking north at section J-7 on the attached map. The red arrow points to the area where Biosolids Recycling, Inc. would like to land apply the remaining biosolids stockpile.

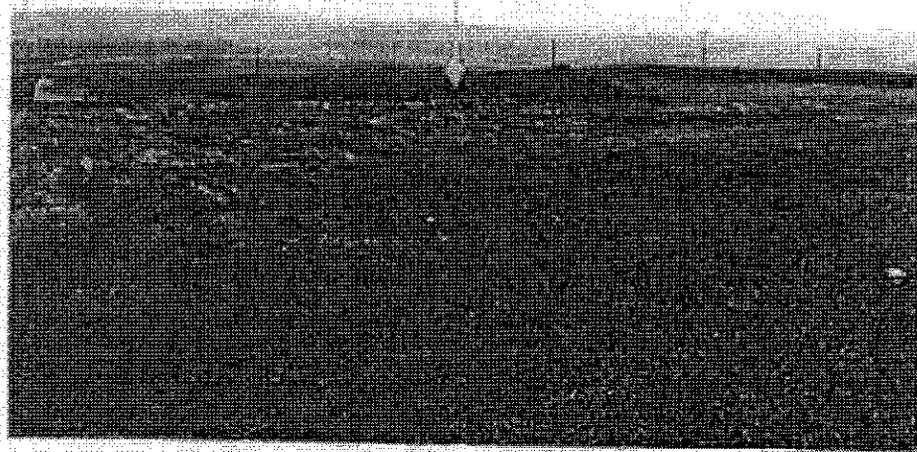


Figure 5  
Standing just east of the remaining biosolids stockpile looking east at a soil stockpile (red arrow) located in the eastern containment basin. This is where the car wash waste water was discharged.

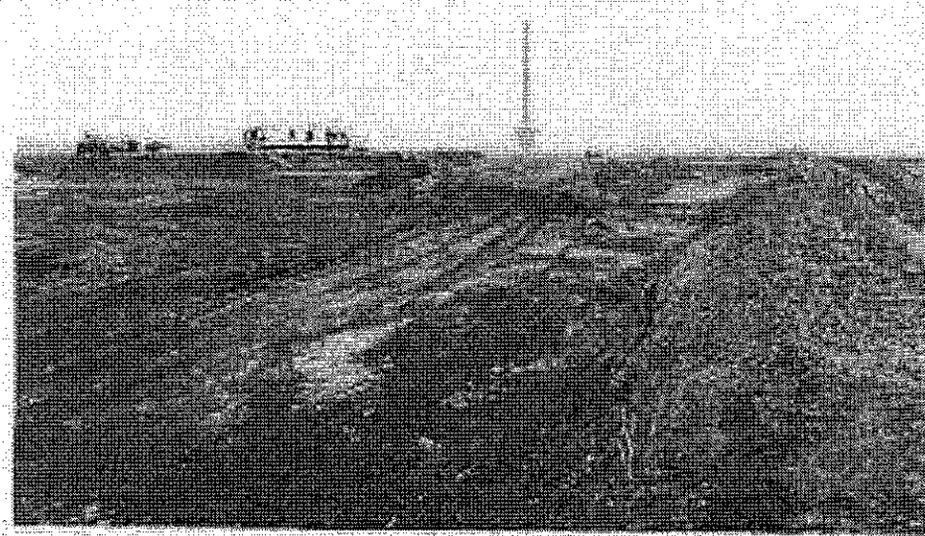


Figure 6  
Standing at the southern end of the eastern containment basin looking north. The red arrow points to the same soil stockpile seen in Figure 5.

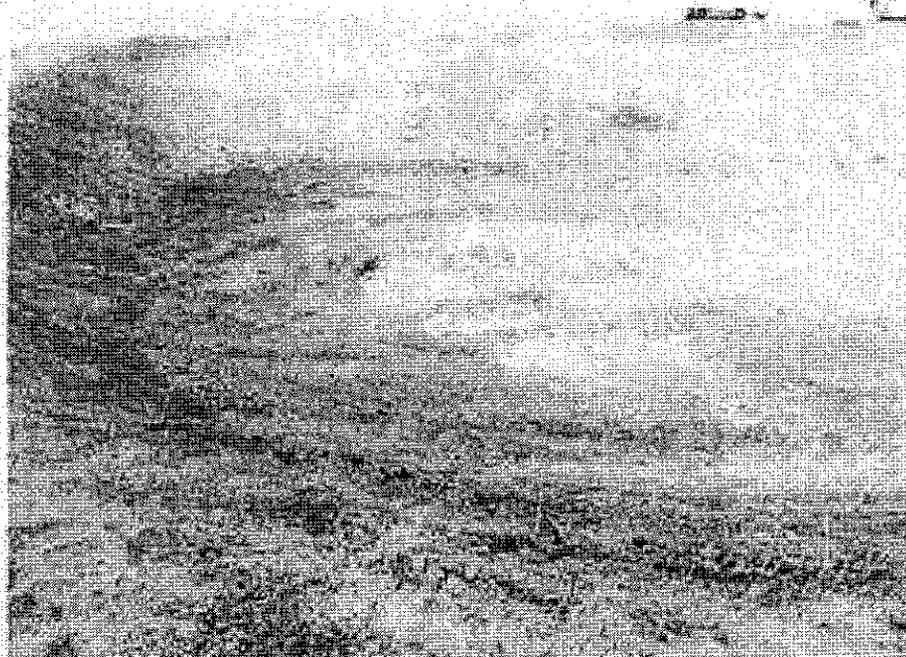


Figure 7

Looking west at the southern end of the eastern containment basin. This is the low point of the eastern containment basin where the car wash waste water discharged into this basin would have accumulated before leaching into the subsurface.

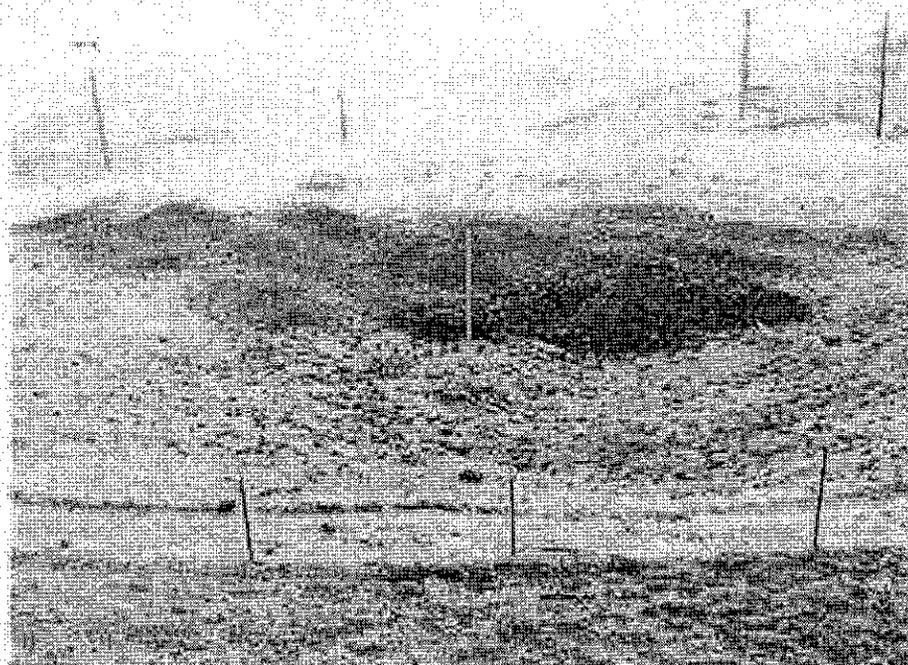


Figure 8

Looking south from atop the eastern containment basin, where the car wash waste water was discharged. According to Michael Harding, the soil piles seen in this photo are waste from the Site's former horse stables. The red arrow points to the carcass of a dead cow.



Figure 9  
Standing just south of the remaining biosolids stockpile, red arrow, looking east across a section of the western containment basin.

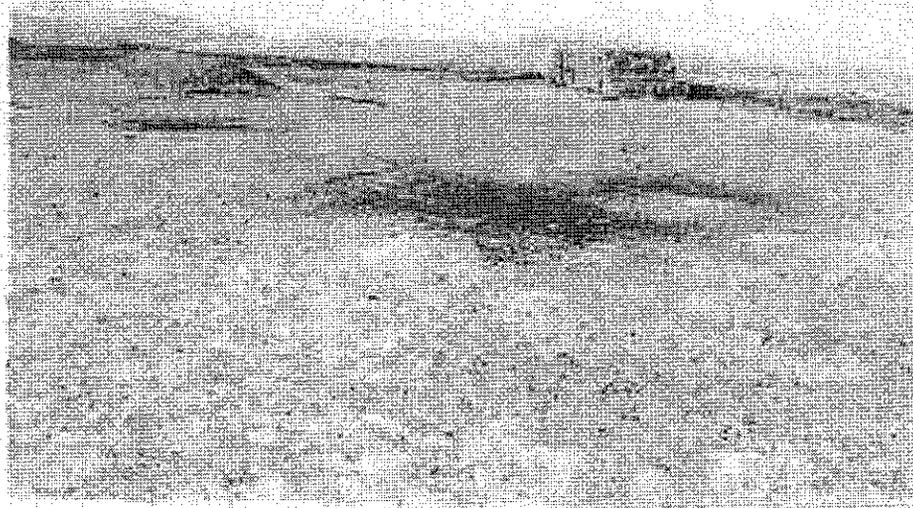


Figure 10  
Looking south across a section of the western containment basin.

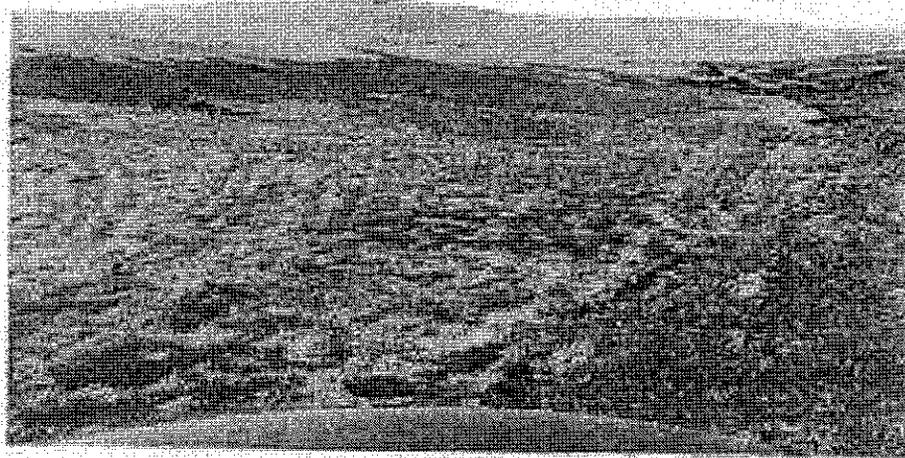


Figure 11  
Looking southwest at recently applied soil on the Marciel Ranch property.

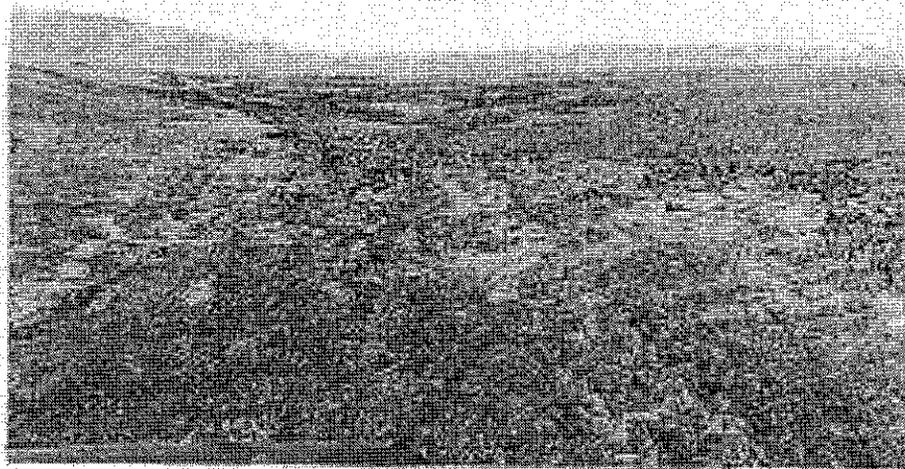


Figure 12  
Standing in the same location as Figure 11, but looking west at the recently applied soil on the Marciel Ranch property. Although hard to see in this Figure, trash as seen in Figures 14, 15, and 16 is contained within this spread soil.

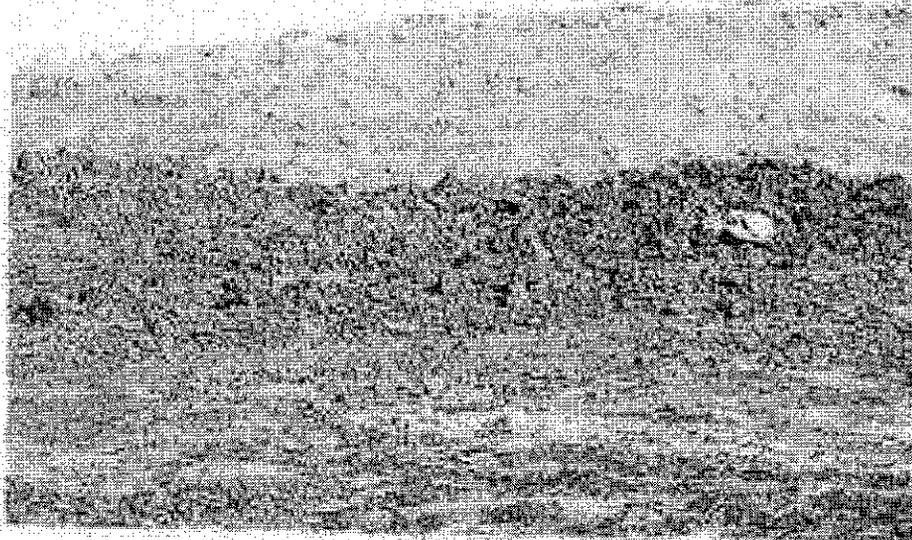


Figure 13

Standing in the same location as Figures 11 and 12, but looking north at recently applied soil on the Marciel Ranch property.



Figure 14

A close-up of some of the trash seen in the soil recently applied to the Marciel Ranch property.



Figure 15

A close-up of some of the trash seen in the soil recently applied to the Marciel Ranch property.



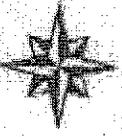
Figure 16

A close-up of some of the trash seen in the soil recently applied to the Marciel Ranch property. This piece of trash was originally imbedded in the soil, and was removed in an effort to identify its origin.

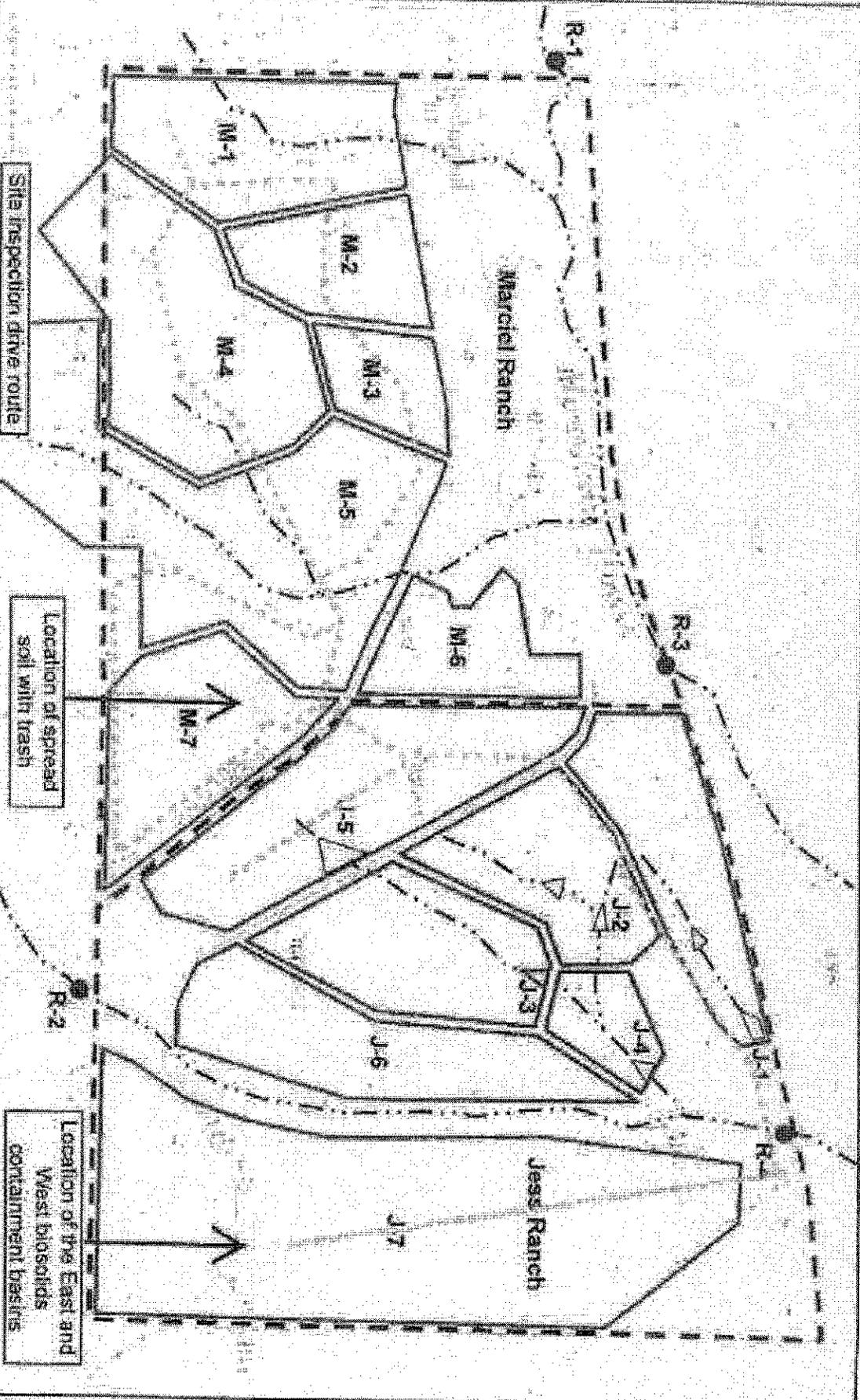
Drawing Reference:  
 Report of Waste Discharge  
 Biosolids Recycling, Inc.  
 December 2001 and  
 August 2005

**DRAINAGE MAP**  
 BIOSOLIDS RECYCLING, INC.  
 JESS RANCH AND MARCEL RANCH  
 ALAMEDA COUNTY

Approx. Scale:  
 1" = 1,200'



- Site Boundary
- Drainage Area Boundary
- Drainage Channel/Track
- △ Storm Water Detention Pond
- R-1 Storm Water Sampling Location



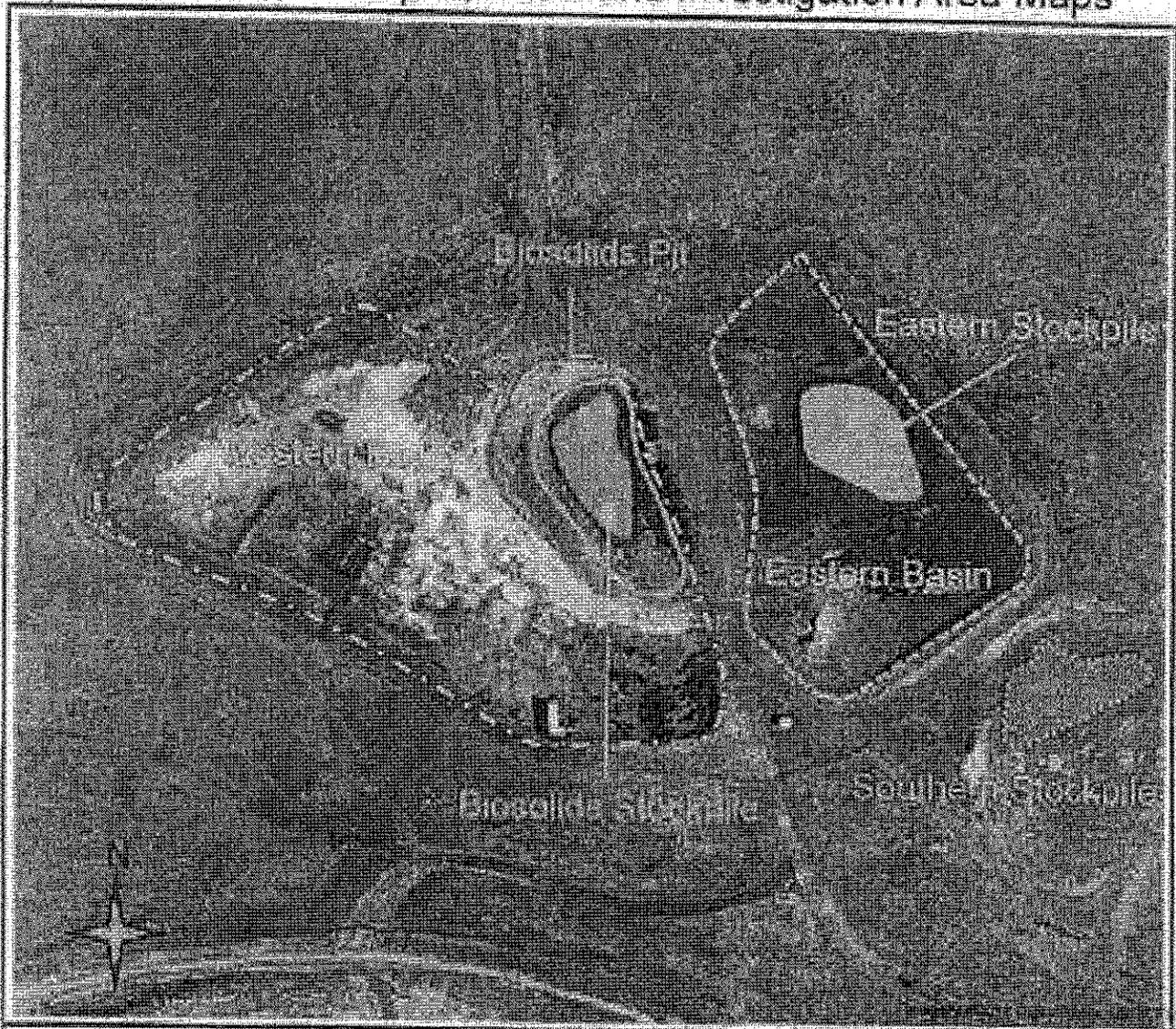
Site inspection drive route

Location of spread soil with trash

Location of the East and West biosolids containment basins

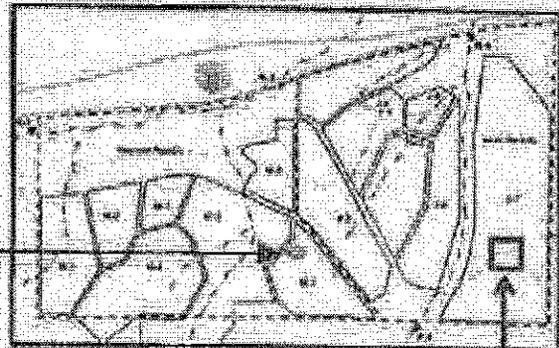
ORDER NO. R5-2006-0071

Attachment C  
Jess Ranch Stockpile, Basin and Investigation Area Maps



0 150' 300'

⇒ M-7 Waste Soil



Map Area