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November 6, 2023

John Dewey, CEO & Managing Member
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[US mail and emailed]

SUBJECT: Notice of Intent to Terminate Agreement between MSB Investors, LLC and the County of Santa Barbara for the Development and Operation of the Tajiguas Resource Recovery Project

Mr. John Dewey,

This letter serves as formal notification of our intent to terminate the Agreement between MSB Investors, LLC (MSB) and the County of Santa Barbara (County) for the Development and Operation of the Tajiguas Resource Recovery Project (Project), also referred to as the ReSource Center, in accordance with Section 14.4 of the Agreement. The Agreement sets forth provisions related to default, material breach, opportunities to cure, and liquidated damages if the County at any time has reasonable cause to believe that MSB is not performing in accordance with the Performance Guarantees or with any other provisions of the Contract. The Resource Recovery and Waste Management Division will seek approval from the Santa Barbara County Board of Supervisors to terminate the Agreement on December 12, 2023. Contingent upon approval of the Board of Supervisors, the termination will be effective immediately and MSB shall cooperate fully with the County and any subsequent third-party Project operator that the County designates to assure a smooth transition of Project operations and management.

The County's determination for Agreement termination pertains to the following items:

1. Failure to cure breach of the Agreement

MSB failed to complete the actions necessary to rectify violations issued by the Central Coast Regional Water Quality Control Board (CCRWQCB) on March 17, 2023 and June 20, 2023 within the permitted time to cure these breaches of the Agreement. The County provided a description and written explanation of non-compliance based on the CCRWQCB Notice of Violations (NOV) in letters dated April 25, 2023 and June 21, 2023 (see Attachment A). The County issued MSB a formal notification of the curable breach to the Agreement on June 21, 2023, with a deadline to rectify the violations by July 6, 2023. The County has continued to meet with and communicate with MSB to try to resolve the violations issued by the CCRWQCB, and allowed MSB additional days to cure the breach prior October 1, 2023 (a total of 102 days). A brief timeline of communication on the matter is also included in Attachment A. MSB did not cure the breach to the Agreement by



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October 1, 2023 revised deadline and continues to operate the Compost Management Unit (CMU) in violation of the Waste Discharge Requirements (WDR) for Commercial Composting Operations (Order WQ 2020-0012-DWQ), jeopardizing the Project's ability to operate and process acceptable waste. On October 11, 2023, the County notified MSB of its right to take over the CMU runoff pipe replacement project under Section 14.8 of the Agreement, citing its incomplete status and MSB's inactivity onsite for over 7 days.

2. Failure to ensure the health and safety of all personnel and visitors

MSB failed to ensure the health and safety of all personnel working and persons visiting the Project site in accordance with Section 5.1.C.15, Section 5.7.B.1 through 7, Section 7.1.K, and Section 11.1.A of the Agreement, which has resulted in accidents, injuries, or hazardous conditions for employees and visitors (see Attachment B). On several occasions, vehicular incidents have occurred (e.g. MSB loader struck parked manlift on August 28, 2023, MSB loader backed into refueling truck on September 19, 2023). Despite receiving prior warnings in person and in bi-weekly Operations/Compliance conference calls, and notices to rectify safety deficiencies, MSB has not taken adequate corrective actions in a timely manner to mitigate the risks and ensure a safe working environment. For example, MSB took over a year to rectify the poor lighting conditions in the Anaerobic Digester Facility (ADF) loading hall, and repair the corroded ADF fire suppression system that leaked in four locations.

MSB continues to exhibit poor housekeeping at the ADF and CMU and has demonstrated recklessness in ensuring a safe work environment. These inadequate safety measures were the cause of the May 12, 2022 compost fire that started with dry compost left too close to the Doppstadt screener on the CMU deck and damaged nearby equipment and infrastructure both at the Project and Tajiguas Landfill. MSB has shown a consistent pattern of disregarding health and safety protocols, posing an ongoing risk to the well-being of employees and visitors at the Project. This disregard was more recently observed on September 19, 2023 when CMU wastewater was being transported from the CMU Run-off Storage Tank to the ADF Percolate Tank by allowing the outflow from a pipe above the ADF entrance doors to splash onto the ADF tipping area, and drain into the ADF sump. A contractor was unloading organic material onto the ADF tipping area within 5 feet of the untreated CMU wastewater and not wearing personal protective equipment that would mitigate risks from coming into contact with pathogenic bacteria.

3. Project development delays and failed Acceptance Tests

MSB failed to meet milestones set in the Project Development Schedule. The original development schedule included in the 3rd amendment required project completion, including passage of Acceptance Tests, by December of 2020. The County approved extensions of the development schedule to March 2021 due to Covid-19 (5th amendment), and further to November 2021 because of Project complexities (6th amendment). On July 5, 2022, the County provided a Notice of Intent to Assess Liquidated Damages for Ongoing Development Delay beginning August 1, 2022. Following subsequent meetings with MSB, the County agreed to stay a collection of the liquidated damages until December 31, 2022, based on MSB's commitment to pass Acceptance Tests by that time.

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To date, MSB has not attained Final Acceptance nor Full Operations of the Project. The County issued a failed rating on March 1, 2023, and gave MSB additional time to provide evidence supporting its passage, which MSB failed to do. Project delays have contributed to the issuance of violations from multiple regulatory agencies (see Attachment C). Due to MSB's inaction to resolve the violations, the County has had to engage contractors to complete corrective actions, such as the CMU runoff pipe replacement project aforementioned in Item #1.

MSB is responsible for all costs of preparing and implementing a County-approved compliance plan, any additional actions required to pass the Acceptance Test, and any additional costs to the County. Because MSB failed to develop a County-approved Compliance Plan as stipulated by Section 4.8 I. of the Agreement by the May 5, 2023 deadline, the County has engaged additional contractors to address the failures for the following four Acceptance subtests; 1) Facility Reliability Test, 2) Facility Capacity Test, 3) Material Recovery Test, and 4) Residue Test.

4. Non-payment to subcontractors, regulatory agency, and County

Section 4.1 A. of the Agreement stipulates that "Unless otherwise specifically identified as the responsibility of a public agency or other party, Contractor is solely responsible for conducting and paying for all activities necessary for the timely Development of the Project Site and all related Project activities in accordance with the requirements of the Contract." Section 4.1 C.3 further specifies that MSB is responsible for "Arranging for, managing, and paying for all work conducted by Subcontractors." At this time, several subcontractors working for MSB have reached out to the County indicating non-payment by MSB, including regulatory agencies such as the Santa Barbara County Air Pollution Control District (see Attachment D). As of the last reporting from MSB to the County on August 15, 2023, the outstanding payables from MSB to subcontractors as of June 30, 2023 was \$5.4 million, up from \$4.3 million as of April 30, 2023.

Section 14.1 B. provides that the "County may, in the event that the Contractor breaches any material provision of the Contract and does not promptly cure said breach within any applicable period provided in this Contract, exercise any legal rights it has under the Contract and under Applicable Law to recover damages or to secure specific performance". Non-payment of the Project's subcontractors jeopardizes the Project's ability to reliably operate, be maintained, and meet Performance Guarantees set forth in the Agreement. Due to MSB's non-payment to Diani Building Corp and their refusal to work for MSB (see Attachment D), the County has had to directly contract with and oversee the installation of the infrastructure for the SG MOBILE® System with GORE® Covers, and for maintenance and replacement of the MRF biofilter (upon Board of Supervisor approval on November 7, 2023).

In April 2023, the County issued a Notice to Assess Liquidated Damages for failure to pass Acceptance Tests and for Water Board violations, which liquidated damages were not stayed and as of November 1, 2023 amount to \$1,103,000. MSB failed to submit

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installments of \$39,500 by September 23, 2023, \$290,000 by October 6, 2023, and \$420,000 by October 13, 2023.

5. Interference with the County's ability to obtain permits for County projects

MSB's outstanding violations with the CCRWQCB and CalRecycle has interfered with the County's ability to obtain and modify permits required for County projects. On September 19, 2023, the County received confirmation from the Local Enforcement Agency (LEA) that permitting for the proposed Tajiguas Landfill Capacity Increase Project could face delays and non-concurrence from CalRecycle due to ongoing odor violations at the ReSource Center (Attachment E). The County also rescinded its application to modify the Solid Waste Facility Permit on March 12, 2023 after being notified by the LEA on June 8, 2022 that CalRecycle would not give concurrence for the proposed Solid Waste Facility Permit modification due to violations issued for the Project.

In addition to the points listed above, the County has refuted and disagreed with the assertions made in MSB's Annual Settlement documentation, particularly the cover letter and six of the nine of the attachments. The County does not believe that the disagreements between the County and MSB can be resolved in a timely manner without negatively impacting operations of the ReSource Center. Similarly, the County has engaged in good faith negotiations with MSB regarding a proposed 7th amendment to the Agreement for over 10 months, without resolution. The County does not believe that the basic functions of the Agreement, such as the Annual Settlement Process or amendments to the Agreement can be resolved at this time, making the Agreement unworkable and termination as the only possible conclusion.

MSB has inaccurately asserted that the County has not acted in good faith to support MSB in the successful construction, commissioning and operation of the ReSource Center. The following highlights the lengths to which the County has gone to support the efficacious completion and operation of this critical community asset:

- **Payment of increased capital costs**

Acting in good faith, the County paid additional capital costs for the construction of the Project based on Covid-19, the Alisal Fire, and complexities of the Project. In the 5th amendment, the County paid MSB an additional \$5,757,819 in capital costs, and an additional \$1,870,000 in the 6th amendment, for a total capital cost increase of \$7,627,819.

- **Extended development schedule**

As previously mentioned in Item # 3, the original development schedule demonstrated completion, including passage of Acceptance Tests, by December of 2020. The County approved the extension of the development schedule to March 2021 as a result of Covid-19, and further again to November 2021 because of Project complexities. The total extension, granted in good faith by the County has amounted to 34 months, as well as a stay of collection of liquidated damages that would have resulted in \$5,000 per day per missed milestone, totaling approximately \$2.3 million.

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- **Excessive disposal of organics**
Due to MSB's extended development schedule, over 36,000 tons of organics were disposed in FY 21/22. The disposal capacity taken by these tons equates to a loss to the Division of at least \$5,500,000 in tipping fees and loss of limited airspace remaining at the Tajiguas Landfill. The County waived these tipping fees in consideration of Covid-19, the Alisal Fire and complexities related to the Project. In FY 22/23, MSB buried over 37,000 tons of organics, causing a value loss of at least \$6,300,000 in tipping fees and loss of limited airspace.
- **Payment of cash flow assistance**
Under the contract terms, the County provided MSB with \$2,494,673 in FY 22/23 to help with financial challenges stemming from the recyclables market fluctuations. MSB requested additional cash flow assistance for FY 22/23 and FY 23/24, but failed to provide the contractually required audited financial documentation by the deadline.
- **Odor minimization**
The Board of Supervisors approved the procurement and installation of the SG MOBILE® System with GORE® Covers to address odors related to CMU operations. The County released \$4.3 million in Retained Earnings from the Resource Recovery & Waste Management Division Enterprise Fund to fund the project. In addition, the County paid \$240 thousand to contractors to haul and dispose of compost from the CMU after the 2023 Storm Events, and paid \$200 thousand to contractors for an odor reducing enzyme for the compost windrows.

In compliance with the provisions outlined in the Agreement, we are required to notify you of our intent to terminate the Agreement and afford you an opportunity to present your case before the Board of Supervisors. **The Board of Supervisors will convene to discuss and vote on this matter on December 12, 2023 at 9:00 am, or as soon thereafter as the matter may be heard, at the County Administration Building Board Hearing Room, located at 105 East Anapamu, Santa Barbara, California.** During this meeting, you will have the opportunity to present your arguments and any relevant information in defense of the Agreement. Please ensure that all relevant documentation and supporting materials are submitted to the Clerk of the Board at sbcob@countyofsb.org no later than 5 p.m. the day prior to the Board meeting.

As discussed over the past 12 months, the County recognizes that MSB does not have the experience to operate the ReSource Center according to industry standards and permit requirements. MSB has verbally expressed an interest in selling the Operational Agreement to another party, although has never submitted to the County the required documentation and deposit of \$50,000 in accordance with Section 15.5 of the Agreement. The County formally reached out to MSB in letters dated March 29, 2023 and April 13, 2023 about potential assignment or willingness to discuss a settlement arrangement, to which MSB failed to reply.

Due to the need to protect the health and safety of our community by regularly collecting and managing municipal waste materials, the County will be exploring alternative operators for the

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ReSource Center, contingent upon approval of the Board of Supervisors for termination of the agreement with MSB.

Pursuant to Section 15.20 of the Agreement, upon termination, MSB is responsible to:

- Deliver to County all computer data, files and tapes, reports, records, documents, and all written materials related to Operations at the Project Site. Please return these items by January 12, 2024.
- Promptly turn over all keys and security codes for access to property and Operations at the Project Site.
- Leave Project Site, facilities and Project equipment clean, intact and fully operable, and deliver possession of the Project Site as directed by County.
- Vacate the Project Site, removing all Contractor property not related to Project Operations.
- Transfer to the County or at the County's request to a new contractor(s), the rights to use any and all patents, licenses, trade secrets, or other intellectual property necessary for all Operations at the Project Site.
- Deliver possession of any proprietary components needed for all Operations at the Project Site to the County or at the County's request to the new operator.
- Provide at least 180 days of transition services, such as training of personnel designated by the County and attend meetings with the next service provider and with County staff, as may reasonably be necessary to enable the County or a new contractor(s) to safely and successfully commence Project Operations.
- Pay all taxes due to appropriate parties including, but not limited to, State, County, Public Participants, and other local agencies.

Your timely attention is anticipated, as well as your diligence to continue operating the ReSource Center in a safe and effective manner as we aim to resolve these matters promptly for the successful progression of the Project.

Sincerely,

DocuSigned by:



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Jeanette Gonzales-Knight, PE
Technical Deputy Director

DocuSigned by:



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Martin Wilder, PE
Operations Deputy Director

cc: Scott McGolpin, Santa Barbara County Public Works Department
Carlyle Johnston, Santa Barbara County Public Works Department

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Attachments:

- Attachment A – Water Board Violations Communication Timeline
- Attachment B – Health and Safety Incident Reports
- Attachment C – Notices of Violations
- Attachment D – Non-payment to Subcontractors and APCD
- Attachment E – Non-compliance Impacts to County Projects

ATTACHMENT A
Water Board Violations Communication Timeline

Attachment A Communication Timeline for Central Coast Regional Water Quality Control Board

- March 1, 2023 – The County of Santa Barbara (County) issues a failed Acceptance Test for the Tajiguas Resource Recovery Project (also referred to as the ReSource Center) and meets with MSB to review the incomplete requirements in order to satisfy the Stormwater Discharge subtest.
- March 17, 2023 – The Central Coast Regional Water Quality Control Board (CCRWQCB) issues a Notice of Violations (NOVs) to MSB for non-compliance with Waste Discharge Requirements (WDR) for Commercial Composting Operations (Order WQ 2020-0012-DWQ).
- April 7, 2023 - The County sends MSB a letter identifying the status of the failed the Acceptance Test and Stormwater Discharge subtest, and refers to corrective actions needed to rectify the CCRWQCB March 2023 NOVs. The County also gives notice to assess liquidated damages for delays with completion of Acceptance Testing.
- April 19, 2023 - County, MSB, and CCRWQCB meet to discuss MSB's schedule to address NOV. MSB commits to resolving corrective actions after wet weather; estimated completion by May 31, 2023.
- April 25, 2023 – County provides notice to assesses liquidated damages for CCRWQCB NOVs, effective on April 26, 2023 and that liquidated damages would continue to be assessed until remedied.
- April 28, 2023 - County and MSB meet to address Acceptance Test and Compliance Plan, stormwater impacted by CMU runoff is a subtest and discussed.
- May 2, 2023 – The County and MSB continue to discuss MSB's non-compliance and status on addressing CCRWQCB NOVs in the scheduled bi-weekly Operations and Compliance meetings.
- May 3, 2023 - MSB requests for additional meeting.
- May 16, 2023 – The County and MSB continue to discuss MSB's non-compliance and status on addressing CCRWQCB NOVs in the scheduled bi-weekly Operations and Compliance meetings (i.e. July 12, July 26).
- June 20, 2023 - The CCRWQCB issues a second NOV letter to MSB and additionally names the County as a responsible party. CCRWQCB asserts none of the original violations identified in the March 17, 2023 Notice of Violation letter were remedied by MSB.
- June 21, 2023 - County issues Notice of Curable Breach with a July 6, 2023 deadline to remedy all violations issued by the CCRWQCB, and refers to accruing liquidated damages.
- July 6, 2023 – MSB provides County update on corrective actions, disputes liquidated damages, and states remaining items will be remedied prior to October 1, 2023.
- July 12, 2023 - County meet with MSB to discuss MSB's progress on corrective actions.
- July 15, 2023 - Rincon Consultants on behalf of MSB submits a response to the CCRWQCB with update of corrective actions.

Attachment A Communication Timeline for Central Coast Regional Water Quality Control Board

- July 18, 2023 – County inspects MSB’s corrective actions; finds them to be incomplete.
- July 26, 2023 – County, MSB, MSB’s consultants, and CCRWQCB meet to discuss MSB’s completed and outstanding corrective actions.
- August 2023 - Rincon on behalf of MSB submit another iteration of the Water and Wastewater Management Plan to the CCRWQCB; the CCRWQCB provides comments and deems corrective actions remain incomplete.
- September 13, 2023 – County sends MSB a determination of curable breach items and requires payment for accruing liquidated damages in installments.
- September 20, 2023 – MSB sends County a response list of curable breach items.
- September 23, 2023 – MSB fails to pay first installment of liquidated damages to County in the amount of \$39,500.
- October 1, 2023 – MSB fails to complete outstanding corrective actions by the revised deadline.
- October 5, 2023 – MSB’s consultant submits revised CMU Water and Wastewater Management Plan to the CCRWQCB without County approval. The County notifies MSB that all proposed changes to the Project and elements of a Compliance Plan must be reviewed and approved by the County.
- October 6, 2023 - MSB fails to pay MSB fails to pay installment of liquidated damages owed to the County in the amount \$290,000 (for Acceptance Tests).
- October 11, 2023 – County sends MSB official notice of County Right to Perform under Section 14.8 of the Agreement and takes over CMU runoff replacement pipe project.
- October 13, 2023 - MSB fails to pay MSB fails to pay installment of liquidated damages owed to the County in the amount of \$420,000.
- October 19, 2023 – MSB’s consultant submits revised CMU Water and Wastewater Management Plan to the CCRWQCB without County approval.
- October 31, 2023 – The County notifies MSB again that all proposed changes to the Project and elements of a Compliance Plan must be reviewed and approved by the County prior to submittal to the CCRWQCB.



Scott D. McGolpin
Public Works Director

Marty Wilder
Interim Deputy Director

April 7, 2023

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SUBJECT: Failure to Pass Acceptance Test and Subtests at the Tajiguas Resource Recovery Project – Notice of Liquidated Damages and Required Compliance Plan

Mr. John Dewey,

The Agreement between MSB Investors, LLC (MSB) and the County of Santa Barbara (County) for the development and operation of the Tajiguas Resource Recovery Project (Project, also referred to as the ReSource Center) sets forth Acceptance Test requirements which consist of passing nine subtests as defined below. Section 4.8H of the Agreement provides that MSB's failure to pass the Acceptance Test, including all nine subtests, requires the assessment of liquidated damages.

As summarized in the County's presentation to MSB on March 1, 2023, MSB has failed to pass the Acceptance Test and the ReSource Center operational activities are not functioning as necessary to meet Performance Guarantees, including Permit limits, at either Full Operations or Limited Operations. The County gave MSB an additional 10 business days to submit data or evidence to support MSB's passing of the Acceptance Test or subtests. MSB submitted additional data to the County to demonstrate the production rate of electricity at the Anerobic Digestion Facility (ADF) engines and solar photovoltaic system located at the Materials Recovery Facility (MRF), and laboratory reports for stormwater samples collected at compliance locations (CW-1, CW-2, and CW-3) during the second half of 2022.

The following is a summary on the status of the nine subtests required in Section 4.8.B.4, as well as all information provided by MSB, of which MSB has only passed 2 subtests, has failed 6 subtests, and 1 subtest is still pending regulatory review. Accordingly, as discussed in more detail below, MSB is required to submit a Compliance Plan to the County by May 5, 2023.

SUMMARY OF SUBTESTS

a) Facility Reliability Test

A test designed to show that the equipment can operate while Processing Acceptable Waste over a sustained period of time.

Status: Failed Test. The County is in receipt of performance testing performed by the supplier, Bekon, and prepared by Cypress Engineering Group. As noted in the *Summary of Acceptance Tests Report for Tajiguas ADF* (dated January 2023), exceptions were



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listed for the ADF and Composting Management Unit's (CMU) ability to meet the required performance criteria. The County is also in receipt of data that summarizes the ADF's venting of untreated biogas to the atmosphere on five occasions during the month of January 2023, the longest event occurring on January 17, 2023 for a duration of four hours and eight minutes. In addition, the County's third-party review of ReSource Center's reliability performed by Tetra Tech in February 2023, identified eight major issues that contributed to the ADF and CMU's inability to pass the Facility Reliability Test. A summary of Tetra Tech's findings was provided to MSB on March 1, 2023 and is included in Attachment A.

b) Facility Capacity Test

A test designed to show that the equipment can operate at its Rated Capacity for a short period of time.

Status: Failed Test. The County is in receipt of performance testing performed by the supplier, Bekon, and prepared by Cypress Engineering Group. As noted in the *Summary of Acceptance Tests Report for Tajiguas ADF* (dated January 2023), exceptions were listed for the ADF and CMU's ability to meet the required performance criteria (e.g. compost quality test). In addition, the County's third-party review of ReSource Center's reliability performed by Tetra Tech in February 2023, identified eight major issues that contributed to the ADF and CMU's inability to pass the Facility Capacity Test. A summary of Tetra Tech's findings was provided to MSB on March 1, 2023 and is included in Attachment A

c) Environmental Compliance Test

A test designed to demonstrate that the Facility can meet air emissions compliance limits in its Permits.

Status: Pending. The County acknowledges that MSB completed the required Source Tests for the various permitted equipment and is awaiting approval of the remaining tests from the Santa Barbara County Air Pollution Control District (SBCAPCD) prior to applying for a Permit to Operate (PTO) for the Resource Center. MSB will receive a passing status once the SBCAPCD has issued a PTO, which is also dependent on Authority to Construct Permit Modification No. 10 and associated post-Alisal Fire repairs. The SBCAPCD approved temporary operation of MRF without operation of a biofilter under a Regular Variance which expires on October 14, 2023.

d) Net Electric Output Test

A test designed for those facilities that produce electricity as a product, to demonstrate the production rate of electricity.

Status: Passed Test. The County is in receipt of data from MSB demonstrating that the MRF engines (received March 1, 2023), ADF engines (received March 3, 2023), and solar photovoltaic system (received March 10, 2023) are able to produce the expected electrical value.

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e) Material Recovery Test

A test designed to demonstrate the quantity and quality of materials and Products recovered by the pre-Processing, and post-Processing facilities, as applicable.

Status: Failed Test. The County is in receipt of the performance testing performed by the supplier, Bekon, and prepared by Cypress Engineering Group. The County also reviewed the incoming quantity of materials and quantity of materials recovered at the ReSource Center during the 2022 calendar year, and found that the requirements for throughput, recovery, and commodity purity were not met.

Facility-wide diversion is currently calculated at 24.6 percent, well below the 64.8 percent projected in Exhibit W of the Agreement between MSB and the County (see Attachment B). Adjusting the diversion requirement using the December 2022 waste characterization, the Contractor is still below the recalculated diversion requirement of 47.1%. During the 2022 calendar year, 47,700 tons of organic material was received at ADF from the MRF. Residual materials sent to the landfill from the ADF/CMU totaled 32,236 tons, and comprised of green material that would have otherwise been diverted from burial if not mixed with the ADF digestate. Only 2,097 tons of finished compost was sent to market offsite.

f) Residue Test

A test designed to demonstrate the quantity and quality of Residue generated by sorting of Acceptable Materials and anaerobic digestion of Organic Materials.

Status: Failed Test. The waste characterization study performed by Sloan Vazquez McAfee (December 2022) showed a non-organic content of 13.2 percent at the MRF. Subsequent sampling over ten days of over 2,000 pounds of organic material sent to the ADF as required by SB 1383 was performed by MRF operations staff in March 2023 determined the non-organic content to be 28.3 percent. Both of these studies demonstrate that the MRF is able to comply with the SB 1383 High Diversion requirements.

However, the ADF was unable to meet the SB 1383 requirements during the First Quarter 2023 sampling event due to the amount of organic content in the residual material (67 percent) as reported to CalRecycle by MSB. The County acknowledges that the Tajiguas Landfill received a total of 24.0 inches of rainfall during the First Quarter 2023 (January 1 through March 31), which impacted the effectiveness of the CMU screens and densimetric table. MSB must complete a subsequent sampling event prior to April 30, 2023 to demonstrate compliance with SB 1383 requirements.

g) Ambient Noise

A test designed to demonstrate compliance with applicable noise standards.

Status: Passed Test. The County is in receipt of test results provided by MSB on February 22, 2022 that demonstrate the ReSource Center can operate in compliance.

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h) Ambient Odor Test

A test designed to demonstrate that no objectionable odors from the Facility are detectable beyond the site boundaries.

Status: Failed Test. The County is in receipt of test results performed by BioLargo Engineering, Science and Technologies, LLC dated March 21, 2022, and SCS Engineers for hydrogen sulfide sampling performed on October 3, 2022. These evaluations do not validate the full capacity or performance of the ReSource Center. The County acknowledges that MSB completed the required sampling pursuant to the SBCAPCD approved *Property Boundary Sulfur Monitoring Plan*, however MSB failed to evaluate additional odiferous compounds related to ADF and CMU operations. A substantial number of odor complaints from the nearby Arroyo Quemada community and ongoing violations from the Local Enforcement Agency (Santa Barbara County Environmental Health Services Division) for odor control at the ADF and CMU demonstrates the lack of compliance with this performance requirement (see Attachment C).

i) Stormwater Discharge Test

A test designed to demonstrate compliance of the Facility with the Industrial Stormwater Permit for the Site.

Status: Failed Test. The County is in receipt of laboratory reports for stormwater samples collected at compliance locations CW-1 (ADF/CMU overflow discharge pipe), CW-2 (ADF storm drain outlet), and CW-3 (MRF storm drain outlet) during qualifying storm events on September 19, 2022, November 7, 2022, and December 1, 2022 (CW-3 only). The results demonstrate the ReSource Center, compliance location CW-1 in particular, has not satisfied this subtest requirement and exceed Numerical Action Levels (NALs) for Iron (annual exceedance limit of 1.0 milligrams per liter [mg/L]) and Total Suspended Solids (annual exceedance limit of 100 mg/L).

The County has not received laboratory reports for stormwater samples collected during qualifying storm events in 2023, which are overdue and required to be submitted to the Water Board's Stormwater Multiple Application and Reporting Tracking System (SMARTS) within 30 days of obtaining results. On February 1, 2023, the County observed an unauthorized non-storm water discharge (NSWD), near leaking joints of the CMU runoff collection pipes (see Attachment D). An NSWD sample was collected by MSB on February 1, 2023 and submitted for laboratory analysis. Analytical results for the sample showed *Escherichia Coli* (5,200 most probably number [MPN] per 100 milliliters [mL]), Iron (2.7 mg/L), Chemical Oxygen Demand (560 mg/L), and Total Phosphorus (2.2 mg/L) were detected at concentrations above NALs (with the exception of *E. Coli*, there is no acceptable level). A copy of the laboratory analytical results is included in Attachment D.

In addition, the Central Coast Regional Water Quality Control Board issued a Notice of Violation to MSB on March 17, 2023 for non-compliance with eight Compost General Order requirements, mostly related to MSB not managing wastewater from the CMU in

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accordance with the Facility's approved Water and Wastewater Management Plan (see Attachment E). The County has also noted in the ReSource Center Commissioning Operation and Compliance meetings with MSB the following concerns that need to be addressed immediately:

1. There are drain inlets that have the ability to convey liquids from the ADF percolate containment area and ADF biofilter to the North Sedimentation Basin. Stormwater runoff from the ADF percolate containment area was observed leaking into the conveyance piping.
2. The lack of capacity in the CMU runoff storage tanks has attributed to over 20 bypass events of CMU runoff water to the North Sedimentation Basin during the 2021-2022 and 2022-2023 wet seasons. Bypass events that could be evaluated in project SCADA occurred from December 24 through 31, 2021; December 2, 3, 4, 10, 11, 12, 2022; January 9, 10, 11, 2023; February 24, 2023; and March 10, 14, 21, 22, 2023.
3. The CMU runoff conveyance piping continues to leak leachate at the pipe joints.

Failure to meet the Acceptance Test requirements, as provided in Section 4.8.H, allows the County to determine what remedies to exercise based on the specific circumstances. In addition, failure to pass the Acceptance Test requires the County to assess damages in accordance with Section 14.9 and Exhibit D. Accordingly, notice is hereby provided that failure to pass the Acceptance Test will result in liquidated damages of \$2,000 per day, until remedied. The County will begin assessing liquidated damages associated with these violations on April 14, 2023. Pursuant to Section 14.9, MSB may, within ten days after receiving this Notice, request a meeting with Marty Wilder, Interim Deputy Director of Public Works, to present oral or written evidence relevant to these ongoing conditions.

MSB is also required to develop a County-approved compliance plan as stipulated in Section 4.8.I:

If the Facility fails to pass the Acceptance Test, Contractor shall develop and implement a County-approved compliance plan. The compliance plan shall consist of a clear identification by Contractor, with approval of County, of (i) what problem the compliance plan is intended to solve; (ii) all potential factors causing such problem; and (iii) Contractor's detailed plan to remedy such problem, including a project schedule and related estimated costs. All aspects of the compliance plan shall be subject to approval of the County. The Contractor shall be responsible for all costs of preparing and implementing the compliance plan and any additional actions required to pass the Acceptance Test.

MSB shall provide the County with a compliance plan for review by May 5, 2023.

The County continues to reserve its right to assess additional liquidated damages in accordance with Exhibit D based on MSB's failure to comply with the Agreement, and to seek any other

John Dewey
MSB Investors, LLC
April 7, 2023
Page 6 of 6

remedies available to resolve said failures. In addition to the liquidated damages, MSB is responsible for all costs of preparing and implementing the County-approved compliance plan, any additional actions required to pass the Acceptance Test, and any additional costs to the County.

The County anticipates your full cooperation in implementing actions necessary to expeditiously complete and operate this very important Santa Barbara County Project.

Sincerely,

DocuSigned by:

E31DF199C737496...

Jeanette Gonzales-Knight
Compliance Manager, Santa Barbara County Public Works Department

Cc: Scott McGolpin, Santa Barbara County Public Works Department
Marty Wilder, Santa Barbara County Public Works Department
Travis Spier, Santa Barbara County Public Works Department
Carlyle Johnston, Santa Barbara County Public Works Department

Attachments:

- Attachment A – Summary of Tetra Tech ADF/CMU Operational Performance Evaluation dated February 17, 2023
- Attachment B – Total Material Delivered and Recovered at the ReSource Center
- Attachment C – Local Enforcement Agency Notice of Violation on Inspections dated March 8, 2023
- Attachment D – Unauthorized Non-Storm Water Discharge Log and Laboratory Results
- Attachment E – Central Coast Regional Water Quality Control Board Notice of Violation Letter dated March 17, 2023

ATTACHMENT A
Summary of Tetra Tech ADF/CMU Operational Performance Evaluation
dated February 17, 2023

SUMMARY OF TETRA TECH ADF/CMU OPERATIONAL PERFORMANCE EVALUATION FEBRUARY 17, 2023

1. Feedstock and Finished Compost Final End Use Issues

The organic waste feedstock (organics extracted at the Mixed Waste MRF) received at the ADF is highly contaminated. There is no process beyond a screen sizing for feedstock preparation. The contamination does not produce biogas and it makes further processing of the digestate difficult. Further compounding the issue is the high usage of ground woody waste to dilute the contamination and managing the odors from the digestate. All of this is causing a negative effect on the composting operations and ability to make a sellable compost.

Finished compost is not going out to market due to the high glass content due to densimetric table (D-table) inconsistent operations. The increased volumes and contamination along with a higher moisture content further impact the refining approach. Agromin is using multiple screen steps to clean the material. This is the right approach given the circumstances, but the final yield of compost and amount of residue for disposal is not effective or sustainable.

MSB believes their major choke point in the CMU operation is the D-table. The organic material from the MRF is wet and of poor quality that the D-table cannot keep up and produces a bad end product out of the CMU.

2. Operations, Maintenance and Management of the ADF

There does not appear to be anyone experienced in anaerobic digestion (AD) at the facility. The most knowledgeable technical person lives in Florida and operates remotely through the system's TeamViewer. The Tetra Tech Team was made aware that a previous general manager left some months back and that Agromin was being asked to takeover. We did discuss this with Dave Camarillo with Agromin at the controls. He did not agree that they were running the plant, but they were trying to help given the lack of oversight.

It is impossible to know all the operations, maintenance, and cleaning activities without an organized plan and series of checklists to validate. The Team's overall sense was that the plant was not operated in this fashion, and instead maintenance seems very reactionary.

We understand that the CMU is operating under Agromin. They are an experienced composter, and the operations of the CMU was organized and well maintained.

3. Mass, Energy, and Water Balance of ADF and CMU

Several imbalances: The first is the actual generation of biogas compared to the expected amounts projected from the AD supplier, Bekon, based on samples of the feedstock. This would then provide a validation on energy available for CHPs, reduce flare usage and target optimal CHP usage.

There is also a high usage of water due to the low moisture content of the feedstock (organics) being lower than anticipated. Moisture in the digestate is lost to evaporation. This significant consumption of percolate must be managed. Unfortunately, the approach to digestate treatment does not reclaim any of that percolate as it must be evaporated via the CMU.

The mass balance information should validate the amount of biogas produced and overall performance of the system. We did not see any direct measurements of biogas production.

4. ADF Maintenance and Cleaning

Given the amount of time the system has been operating, there should be a routine and robust cleaning and maintenance program. We understand that no treatment for struvite was being done until very recently. Struvite is a known issue for AD plants and the build-up is quick and severe which impacts performance of the AD plant.

5. Biogas Storage

A typical design for an AD plant is to include a biogas buffer or storage so that there is a place for biogas to store and mix for consistency prior to use by CHPs or flared. The common approach is a bladder. This is a low cost and simple approach. The Tetra Tech Team would expect one (1) bladder for each eight (8) digesters or two (2) for the ADF. This would provide a steady flow of biogas to the CHPs and allow the digesters to continue to produce and hold the biogas if there are issues with the CHPs. The lack of biogas storage will lead to the venting of biogas from the digester when the pressure increases inside the system. This should not happen other than in extreme conditions. It is our understanding from MSB that there were four (4) venting events last month (Dec 2022). We have requested the alarm notices for the ADF to validate and see how many other such events have occurred. The venting of biogas is dangerous and will cause odors.

6. Digestate Treatment for Odor Control

Digestate treatment is a serious design and operations consideration for all AD plants. Fresh digestate has ammonia trapped in the solids that is released during movement or further processing. This can lead to nuisance odors. It is suspected to be the main cause of odors from the ADF. Typical treatments include the use of heat and air in an in-vessel compost tunnel to remove ammonia, complete the Process for Reduction of Pathogens per EPA 503 (PFRP), reduce moisture content, and allow for transportation or further aerobic processing. Currently untreated digestate exits the ADF facility via a conveyor belt. The digestate is open to the outside. The CMU is mitigating by covering the digestate with ground woody materials. The combined materials are placed into windrows for composting. This procedure helps mitigate the digestate odor. However, it also spreads the odor to the windrows. Each pass of the windrow turner further aerates and exposes the digestate for a release of ammonia. The heat and aeration are working to remove the ammonia. Unfortunately, this is outside with sensitive receptors downwind.

Also, the County informed the Tetra Tech Team that the odor complaints the site is receiving are coming from individuals that live south of the landfill across Highway 101/1. According to MSB, they claim ADF is not leaking biogas. However, they admitted and suspected venting of biogas is occurring and will cause odor. The County and MSB have performed numerous evaluations and implemented odor mitigation BMPs with little success.

7. Control Systems and SCADA Issues

There are multiple Control/SCADA systems in use at the ADF. This is due to the limits of supply between the AD supplier, CHP supplier and Flare supplier. The operator complains of numerous problems with each system and the inability for the systems to work together. The Tetra Tech

Team observed many system faults and an inability to operate the system in an automated mode. The operator complained of many off-hour checks and changes to keep the system running. This is not typical. There needs to be one Control system that integrates the individual systems together and there needs to be full visibility on the parameters with the Bekon controls code to insure proper operation and a priority for alarms or faults.

8. Black Smoke from Enclosed Flare at Startup

The County reported observing black smoke exiting the top of the enclosed ground flare at the ADF. The ADF is equipped with a John Zink ZTOF enclosed flare that is permitted for use during ADF purging events and if one of the ADF CHP engines is nonoperational. The flare was not operating during the Tetra Tech Team's site visit.

Black smoke coming out of a flare can be caused by multiple operational issues. The most common cause for black smoke is the flare louvers not responding properly during the flare startup process. Typically, during startup the flare louvers should be slightly open. This will allow ambient air to mix with biogas/LFG in the flare combustion chamber and allow the air gas mixture to combust properly and allow the flare to reach the desired operating temperature. The temperature in the enclosed ground flare is measured by multiple thermocouples located at different heights in the flare stack. The flare operational logic typically operates using one thermocouple at a time, and the selection of the correct operation thermocouple plays a major role in the proper startup of the flare. The selection of the wrong thermocouple can cause the issues with how the flare louvers respond to control the flare operating temperature.

ATTACHMENT B

Total Material Delivered and Recovered at the ReSource Center

Total Material Delivered and Recovered at the ReSource Center

Reporting Period: January 1, 2022 through December 31, 2022

Material	Total Material Delivered (tons)	Recyclables Recovered (tons)	Organics Recovered (tons)	Total Material Recovered (tons)	Total Materials Recovered (%)
Mixed Waste					
Franchise Tons	133,641.00	1,508.87	10,311.51	11,820.38	8.84%
Self Haul Tons	11,345.20	139.98	874.77	1,014.75	8.94%
TOTAL	144,986.20	1,648.85	11,186.28	12,835.13	8.85%
Source Separated Recyclables (SSR)					
TOTAL	38,161.80			28,978.70	75.94%
Source Separated Organics (Food Scraps)					
Total	4,365.00			4,277.70	98.00%
TOTAL FACILITYWIDE	187,513.00			46,091.53	24.6%

Notes:

The recovery rate for SSR is based on the December Performance and Characterization report.

The recovery rate of both the Franchise and the Self Haul tons are based on the difference of the SSR recovery rate from actual disposal.

The recovery rate for the SSO is based on Original Exhibit W.

The net amount recovered from Mixed Waste is done by comparing what was sent to the MRF and what was buried after backing out the amount buried that came from SSR.

ATTACHMENT C
Local Enforcement Agency Notice of Violation
on Inspections dated March 8, 2023

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
3/8/2023

No Areas of Concern

Inspection Report Comments

Weather: Mostly sunny, 48F and northerly winds at 12 mph

Anaerobic Digestion Facility (ADF) Focused Weekly Inspection:

-Upon arrival to ADF, noted main doors were in the process of getting shut by truck transporting digestate to CMU.

-Noted piles of Source Separated Organics (SSO), Organic Fraction of Municipal Solid Waste (OFMSW) from the MRF.

-Both eye-wash stations and showers were operating adequately.

-Noted misters were not operating during today's inspection.

Notes:

1. Refer to violation for 14 CCR section 17896.32 Odor and Nuisance Control
2. Ensure misters are operating during business hours.
3. Next Five-Year Review application will be due on February 2, 2027.

On Wednesday, March 8, 2023, LEA responded to ongoing odor complaint by conducting an odor survey from Arroyo Quemada Lane in the morning before and after Tajiguas focused inspection of the ADF and CMU.

No other potential odor sources were identified except for operations at Tajiguas Sanitary Landfill and ReSource Center. During the inspection, the LEA was not made aware of any unusual operational changes or atypical feedstocks.

Upon arrival at Arroyo Quemada Lane at approximately, 8:15 am, the weather was 48F and cloudy with a wind at 12 mph in a northerly direction and LEA noticed a faint compost odor on Arroyo Quemada Lane, this odor was noticeable throughout the lane.

After periodic inspection of Tajiguas Landfill and associated facilities, LEA conducted another odor survey at Arroyo Quemada Lane at approximately 10 am and a faint compost odor remained. The weather had not changed.

The odors detected in the morning would interfere with the comfortable enjoyment of life.

Furthermore, on Wednesday, March 8 2023, LEA responded to ongoing odor complaint by conducting an odor survey from Refugio Rd.in the morning.

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
3/8/2023

No other potential odor sources were identified except for operations at Tajiguas Sanitary Landfill and ReSource Center. During the inspection, the LEA was not made aware of any unusual operational changes or atypical feedstocks.

Upon arrival at Refugio Rd. at approximately, 10:30 am, the weather was 52F and cloudy with a wind at 10 mph in a westerly direction and LEA did not notice any compost odor in the area of the addresses provided for Refugio Rd.

No Attachments

**Compostable Materials Handling Operation and Facility Inspection
Report (93)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
3/8/2023**

Inspection Information

Inspected By: Santa Barbara County **Local Inspection ID:**
Inspection Date: 3/8/2023 **Time In:** 9:15 AM
Inspection Type: Focused **Time Out:** 9:45 AM
Inspector: Norma Campos Bernal **Inspection Duration:** 1/2 hour
Operator: County Of Santa Barbara Public Works Dep
Received By: dylan@mustangrpv.com; john@deweygroup.com
Also Present (Name):

Facility/Activity Information

Enforcement Agency: County of Santa Barbara **SWIS Number:** 42-AA-0015
Facility: **Tajiguas Res Rec Proj & Sanitary LF**
14470 Calle Real
Goleta, CA 93117
Activity: Composting Facility (Mixed)
Operational Status: Active **Regulatory Status:** Permitted
Land Owners(s):
County Of Santa Barbara Public Works Dep

The above facility was inspected for compliance with applicable sections of Division 30 of the Public Resources Code (PRC) and Title 14 and Title 27, California Code of Regulations (CCR).

Violations

14 CCR 17867(a)(2) - Odor Control

Operation of facility that has been and is currently creating odor and nuisance conditions off-site. Complaints received by email on March 7 and 8, 2023. No additional complaints received from Refugio Rd. neighborhood.

Operator to immediately implement procedures established in operator's OIMP, and take additional reasonable and feasible measures (such as identified in submitted Odor Best Management Practice (BMP) Feasibility Report) to minimize and control nuisance odor impact.

**Compostable Materials Handling Operation and Facility Inspection
Report (93)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
3/8/2023**

No Areas of Concern

Inspection Report Comments

Weather: Mostly sunny, 48F and northerly wind at 12 mph

CMU Focused Weekly Inspection:

- Noted truck making multiple trips to deliver digestate from ADF.
- Noted 19 windrows of compost undergoing curing process on the CMU floor this day and one of them had completed pathogen reduction period.
- Noted two large piles of unscreened finished compost.
- Noted one pile of mulch in between windrows.
- Noted hills below CMU all clear of litter this day, but noted some litter on outside of CMU enclosure facing the landfill.

Notes:

1. Refer to violation from 14CCR Section 17867(a)(2)-Odor Control.
2. Collect all litter on north side enclosure.
3. Next Five-Year review Application will be due on February 2, 2027.

On Wednesday, March 8, 2023, LEA responded to ongoing odor complaint by conducting an odor survey from Arroyo Quemada Lane in the morning before and after Tajiguas focused inspection of the ADF and CMU.

No other potential odor sources were identified except for operations at Tajiguas Sanitary Landfill and ReSource Center. During the inspection, the LEA was not made aware of any unusual operational changes or atypical feedstocks.

Upon arrival at Arroyo Quemada Lane at approximately, 8:15 am, the weather was 48F and cloudy with a wind at 12 mph in a northerly direction and LEA noticed a faint compost odor on Arroyo Quemada Lane, this odor was noticeable throughout the lane.

Compostable Materials Handling Operation and Facility Inspection Report (93)

Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)

3/8/2023

After periodic inspection of Tajiguas Landfill and associated facilities, LEA conducted another odor survey at Arroyo Quemada Lane at approximately 10 am and a faint compost odor remained. The weather had not changed.

The odors detected in the morning would interfere with the comfortable enjoyment of life.

Furthermore, on Wednesday, March 8 2023, LEA responded to ongoing odor complaint by conducting an odor survey from Refugio Rd. in the morning.

No other potential odor sources were identified except for operations at Tajiguas Sanitary Landfill and ReSource Center. During the inspection, the LEA was not made aware of any unusual operational changes or atypical feedstocks.

Upon arrival at Refugio Rd. at approximately, 10:30 am, the weather was 52F and cloudy with a wind at 10 mph in a westerly direction and LEA did not notice any compost odor in the area of the addresses provided for Refugio Rd.

Attachments

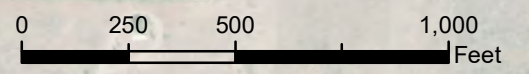
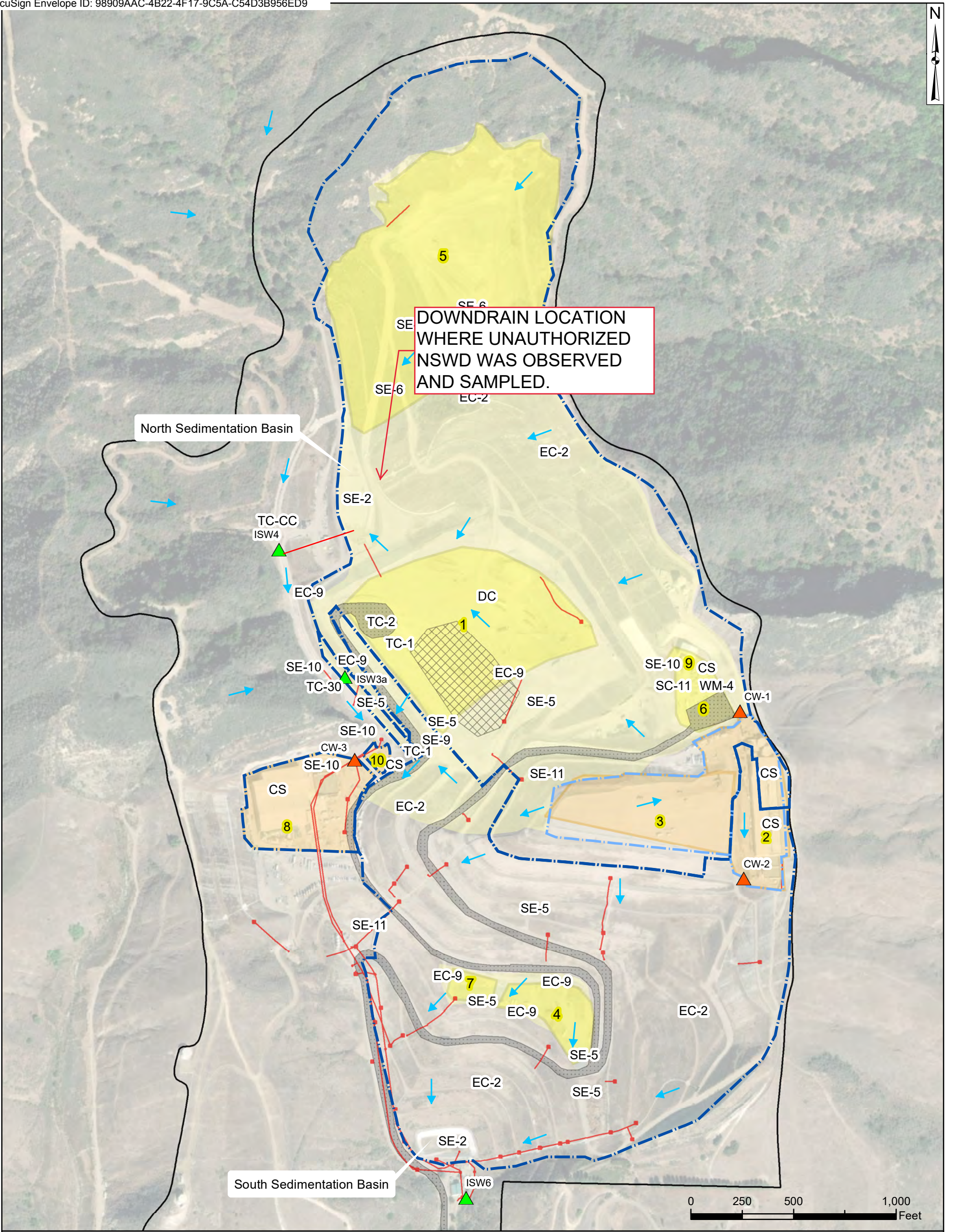
Tajiguas CMU



ATTACHMENT D
Unauthorized Non-Storm Water Discharge Log and Laboratory Results

OBSERVATIONS DURING SAMPLING TAJIGUAS LANDFILL		
Date and Time of Observation: 2-1-2023 1:30pm		
Inspector Information		
Inspector Name: Christina Wilder	Inspector Title: QISP	
Signature: <i>Christina Wilder</i>	Date: 3-7-2023	
Exception Documentation (Provide explanation if observation could not be conducted)		
Weather		
Weather conditions: CLEAR 56°	Precipitation Total: 8.99 inches January 1 thru 16	
Sampling Event Observations		
Observations:		
Odors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Floating material	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Suspended Material	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sheen	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Discolorations	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Turbidity	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complete the following for each Yes answer from above		
Location within Drainage Area	Identify pollutant and suspected cause of pollutant	Describe any response actions and/or SWPPP revisions necessary
North Sedimentation Basin	Likely a compost-related pollutant originating from ADF or CMU	

SAMPLING LOG TAJIGUAS LANDFILL ISW4 (WITH CMU COMPOST DISCHARGE)		
Date:	Sampling Start Time:	
Sampler Name:	Sampler Signature:	
Sampling conducted within four hours of: (Check one)		
<input type="checkbox"/> The start of the discharge		
<input type="checkbox"/> The start of the facility operations if the QSE occurred within the previous 12-hour period		
Exception Documentation (Provide explanation if sampling could not be conducted)		
Field Meter Calibration		
pH Meter ID No. or Description:		
Calibration Date/Time:		
Field pH Measurement		
pH:	Time:	
Samples Collected		
Constituent	Analytical Method	Time
Oil and Grease	EPA1664A	
TSS	SM 2540D	
Iron	EPA 200.7	
COD	SM 5220C	
E. Coli	SM 9223B	
Total Phosphorus	SM4500-P B+E	
Nitrate + Nitrite (as N)	SM 4500-NO3-E	
Lead	EPA 200.8	
Zinc	EPA 200.8	
Additional Sampling Notes: A GRAB SAMPLE IDENTIFIED AS R.O.V.D. WAS COLLECTED BY MSB STAFF AT THE DOWNDRAIN WHERE IT WAS DISCHARGING TO THE NORTH SEDIMENTATION BASIN.		
Sampling End Time:		



Legend

- ReSource Center Compliance Monitoring Locations (under separate IGP coverage)
- TSL Compliance Monitoring Location
- Storm drain network
- IGP Drainage Area
- ReSource Center IGP Drainage Area (under separate IGP coverage)
- Site Boundary
- Wet weather deck for rain days
- Paved Access Road
- Sloped Hillside/Former Landfill Operations (subject to IGP)

Operational Areas

- Landfill Operational Area
- Resource Center Operational Area

BMPs

- CS: Covered Structure
- DC: Temporary coverings
- EC-2: Maintain/preserve existing vegetation
- EC-9: Earth dike/drainage swale
- SE-2: Sedimentation basin
- SE-5: Fiber roll
- SE-6: Gravel bag berm
- SE-9: Straw bale barrier
- SE-10: Storm drain inlet protection
- SC-11: Preventative maintenance
- TC-CC: Concrete channel
- TC-1: Stabilized access road
- TC-2: Stabilized roadway
- TC-30: Bioswale
- WM-4: Oil tank in secondary containment

Sitewide BMPs

- SE-5: Fiber rolls on slopes or surfaces with potential for erosion
- EC-2: Maintain/preserve existing vegetation
- EC-4: Trackwalk and hydroseed bare areas
- EC-11: Slope drains and conveyance ditches

Operational Areas

1. Active Waste Disposal Area
2. ReSource Center: Anaerobic Digester Facility (separate IGP coverage)
3. ReSource Center: Composting Management Unit Area (separate IGP coverage)
4. Green Waste
5. North Soil Stockpile
6. Storage and Vehicle Fueling Area
7. Staging Area
8. ReSource Center: Materials Recovery Facility (separate IGP coverage)
9. Maintenance Area
10. Marborg Maintenance Area

Note:

-Areas other than the paved access road are pervious areas that may be a source of dust in dry weather or subject to erosion in wet weather

Drainage and BMP Map

Tajiguas Landfill
Santa Barbara, California



Figure

3

Santa Barbara

January 2022



Analytical Report

Oilfield Environmental & Compliance, Inc.

Dylan Ellis
Mustang Renewable Power Ventures
14470 Calle Real
Goleta, CA 93117

OEC Work Order: **2300847**
Report Date: **February 22, 2023 19:12**

Project: **MRPV-ADF**
Number: **R.O.V.D.**

Enclosed is an analytical report for the above referenced project. The samples included in this report were received on February 02, 2023 12:10 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report, please do not hesitate to contact the undersigned.

Authorized for release by:

Meredith Sprister, Business Director
msprister@oecusa.com

This laboratory is accredited in accordance with the recognised International Standard ISO/IEC 17025. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO/ILAC-IAF Communiqué dated April 2017)

307 Roemer Way, Suite 300
Santa Maria, CA 93454

Main: (805) 922-4772
Fax: (805) 925-3376



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TNI 2016 & ISO/IEC 17025:2017
CA-ELAP 2438, TNI 02666



Oilfield Environmental & Compliance, Inc.

Mustang Renewable Power Ventures
14470 Calle Real
Goleta CA, 93117

Project: MRPV-ADF
Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

Sample Summary

Sample ID	Laboratory ID	Client Matrix	Lab Matrix	Date Sampled	Date Received
R.O.V.D.	2300847-01	Water	Water	02/01/2023 13:30	02/02/2023 12:10

Sample Batch Preparation Summary

Analysis	Batch ID	Preparation Date/Time
Anions by IC		
EPA 300.0	B3B0055	02/02/2023 14:39
Nitrate/Nitrite as N	[CALC]	02/02/2023 14:39
EPA 300.0	B3B0055	02/02/2023 14:39
General Chemistry Parameters by EPA or APHA Standard Methods		
9040B pH	B3B0426	02/14/2023 07:05
COD, Chemical Oxygen Demand	B3B0088	02/03/2023 09:16
Oil and Grease by EPA 1664	B3B0643	02/21/2023 06:34
pH Sample Temperature	B3B0426	02/14/2023 07:05
Phosphorus, Total as P by SM4500-P B,E/EPA 365.3	B3B0153	02/06/2023 13:07
Solids, Total Suspended (TSS), SM2540D	B3B0225	02/07/2023 19:48
Microbiological Parameters by APHA Standard Methods		
E.coli QT MPN SM9223B	B3B0072	02/02/2023 14:25
Total Metals by ICP		
200.7 Total	B3B0181	02/07/2023 08:46

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

CA-ELAP 2438, TNI02666
307 Roemer Way, Santa Maria, CA 93454

Client Connect: client.oec.com/reports
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TEL: (805) 922-4772
FAX: (805) 925-3376



Oilfield Environmental & Compliance, Inc.

Mustang Renewable Power Ventures
14470 Calle Real
Goleta CA, 93117

Project: MRPV-ADF
Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

Analytical Report for Samples

Sample ID : **R.O.V.D.**
Matrix : Water
Lab ID : 2300847-01

Sampled : 02/01/23 13:30
Sampled by : Dylan Ellis
Field Data : NA

Analyte	Result	RL	Units	Dilution	Batch	Analyzed	Method	Notes
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Microbiological Parameters by APHA Standard Methods

E. Coli	5200	10	MPN/100 mL	10	B3B0072	02/03/23 09:56	SM 9223B	HT-09
----------------	-------------	----	---------------	----	---------	----------------	----------	--------------

Anions by IC

Nitrate/Nitrite as N	ND	0.40	mg/L	1	[CALC]	02/02/23 23:13	Calculation	
Nitrate as N	ND	0.40	"	"	B3B0055	"	EPA 300.0	
Nitrite as N	ND	0.40	"	"	"	"	"	

Total Metals by ICP

Iron	2.7	0.050	mg/L	1	B3B0181	02/09/23 13:18	EPA 200.7	
-------------	------------	-------	------	---	---------	----------------	-----------	--

General Chemistry Parameters by EPA or APHA Standard Methods

pH @ 25 C	7.49	0.10	pH Units	1	B3B0426	02/14/23 07:05	EPA 9040B/SM4500H+ B	HT-pH
pH Sample Temperature During Analysis	21	1.0	°C	"	"	"	EPA 170.1/SM 2550B	
Chemical Oxygen Demand	560	200	mg/L	10	B3B0088	02/03/23 13:00	SM 5220D	
Total Oil & Grease	ND	5.0	"	1	B3B0643	02/21/23 07:15	EPA 1664A	
Phosphorus-Total as P	2.2	0.25	"	10	B3B0153	02/06/23 13:28	SM 4500-P B,E / EPA 365.3	
Total Suspended Solids	49	10	"	1	B3B0225	02/07/23 21:30	SM 2540D	

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Goleta CA, 93117

Project: MRPV-ADF
Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

Anions by IC - Quality Control

Analyte	Result	RL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	----	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch B3B0055 - EPA 300.0 Preparation: EPA 300.0/300.1 Anions Prep 02/02/23 09:30

Blank (B3B0055-BLK1)

Analyzed: 02/02/23 13:30

Nitrate as N	ND	0.40	mg/L							
Nitrite as N	ND	0.40	"							

LCS (B3B0055-BS1)

Analyzed: 02/02/23 12:11

Nitrate as N	4.99	0.40	mg/L	5.00		100	90-110			
Nitrite as N	5.03	0.40	"	5.00		101	90-110			

LCS Dup (B3B0055-BSD1)

Analyzed: 02/02/23 12:27

Nitrate as N	5.00	0.40	mg/L	5.00		100	90-110	0.2	20	
Nitrite as N	5.08	0.40	"	5.00		102	90-110	1	20	

Duplicate (B3B0055-DUP1)

Source: 2300855-01

Analyzed: 02/02/23 17:11

Nitrate as N	ND	2.0	mg/L		ND					20
Nitrite as N	ND	2.0	"		ND					20

Matrix Spike (B3B0055-MS1)

Source: 2300855-01

Analyzed: 02/02/23 17:27

Nitrate as N	25.7	2.1	mg/L	26.3	ND	97	90-110			
Nitrite as N	25.9	2.1	"	26.3	ND	98	90-110			

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



Oilfield Environmental & Compliance, Inc.

Mustang Renewable Power Ventures
14470 Calle Real
Goleta CA, 93117

Project: MRPV-ADF
Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

Total Metals by ICP - Quality Control

Analyte	Result	RL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch B3B0181 - EPA 200.7 Preparation: EPA 200.7 02/07/23 08:46

Blank (B3B0181-BLK1)

Analyzed: 02/09/23 11:38

Iron ND 0.050 mg/L

LCS (B3B0181-BS1)

Analyzed: 02/09/23 11:43

Iron 10.3 0.050 mg/L 10.0 103 85-115

LCS Dup (B3B0181-BSD1)

Analyzed: 02/09/23 11:45

Iron 10.5 0.050 mg/L 10.0 105 85-115 2 20

Duplicate (B3B0181-DUP1)

Source: 2300930-03

Analyzed: 02/09/23 11:53

Iron ND 0.050 mg/L ND 20

Matrix Spike (B3B0181-MS1)

Source: 2300930-03

Analyzed: 02/09/23 11:48

Iron 10.7 0.050 mg/L 10.0 ND 107 70-130

Matrix Spike (B3B0181-MS2)

Source: 2300935-02

Analyzed: 02/09/23 11:50

Iron 10.5 0.050 mg/L 10.0 0.0763 105 70-130

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Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

General Chemistry Parameters by EPA or APHA Standard Methods - Quality Control

Analyte	Result	RL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch B3B0088 - SM 5220D Preparation: Wetchem default method 02/03/23 09:16

Blank (B3B0088-BLK1)				Analyzed: 02/03/23 13:00						
Chemical Oxygen Demand	ND	20	mg/L							
LCS (B3B0088-BS1)				Analyzed: 02/03/23 13:00						
Chemical Oxygen Demand	240	20	mg/L	250		97	57-134			
LCS Dup (B3B0088-BSD1)				Analyzed: 02/03/23 13:00						
Chemical Oxygen Demand	250	20	mg/L	250		99	57-134	3	10	
Duplicate (B3B0088-DUP1)	Source: 2300120-11			Analyzed: 02/03/23 13:00						
Chemical Oxygen Demand	140	20	mg/L		140			3	10	
Matrix Spike (B3B0088-MS1)	Source: 2300120-11			Analyzed: 02/03/23 13:00						
Chemical Oxygen Demand	470	27	mg/L	333	140	98	80-120			
Matrix Spike Dup (B3B0088-MSD1)	Source: 2300120-11			Analyzed: 02/03/23 13:00						
Chemical Oxygen Demand	460	27	mg/L	333	140	97	80-120	0.7	20	

Batch B3B0153 - SM 4500-P B,E / EPA 365.3 Preparation: NONE 02/06/23 13:07

Blank (B3B0153-BLK1)				Analyzed: 02/06/23 13:28						
Phosphorus-Total as P	ND	0.025	mg/L							
LCS (B3B0153-BS1)				Analyzed: 02/06/23 13:28						
Phosphorus-Total as P	0.30	0.025	mg/L	0.300		101	85-115			
LCS Dup (B3B0153-BSD1)				Analyzed: 02/06/23 13:28						
Phosphorus-Total as P	0.28	0.025	mg/L	0.300		95	85-115	7	20	
Duplicate (B3B0153-DUP1)	Source: 2300120-13			Analyzed: 02/06/23 13:28						
Phosphorus-Total as P	7.0	0.025	mg/L		7.0			0.4	20	

Batch B3B0225 - SM 2540D Preparation: 2540 D TSS Prep 02/07/23 19:48

Duplicate (B3B0225-DUP1)	Source: 2300847-01			Analyzed: 02/07/23 21:30						
Total Suspended Solids	50.0	10	mg/L		49.4			1	20	
Duplicate (B3B0225-DUP2)	Source: 2300856-02			Analyzed: 02/07/23 21:30						
Total Suspended Solids	2580	10	mg/L		2600			0.8	20	

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CA-ELAP 2438, TNI02666
307 Roemer Way, Santa Maria, CA 93454

Client Connect: client.oec.com/reports
www.oecusa.com

TEL: (805) 922-4772
FAX: (805) 925-3376



Oilfield Environmental & Compliance, Inc.

Mustang Renewable Power Ventures
14470 Calle Real
Goleta CA, 93117

Project: MRPV-ADF
Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

General Chemistry Parameters by EPA or APHA Standard Methods - Quality Control

Analyte	Result	RL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch B3B0426 - EPA 9040B/SM4500H+ B Preparation: EPA 9040B pH Prep 02/14/23 07:05

LCS (B3B0426-BS1)				Analyzed: 02/14/23 07:05						
pH @ 25 C	3.98	0.10	pH Units	4.01		99	90-110			
LCS (B3B0426-BS2)				Analyzed: 02/14/23 07:05						
pH @ 25 C	7.02	0.10	pH Units	7.00		100	90-110			
LCS (B3B0426-BS3)				Analyzed: 02/14/23 07:05						
pH @ 25 C	10.01	0.10	pH Units	10.0		100	90-110			
Duplicate (B3B0426-DUP1)	Source: 2300764-01			Analyzed: 02/14/23 07:05						
pH @ 25 C	8.33	0.10	pH Units		8.37			0.5	10	
pH Sample Temperature During Analysis	20.9	1.0	°C		20.3			3	10	
Duplicate (B3B0426-DUP2)	Source: 2300770-01			Analyzed: 02/14/23 07:05						
pH @ 25 C	7.32	0.10	pH Units		7.37			0.7	10	
pH Sample Temperature During Analysis	21.9	1.0	°C		20.6			6	10	

Batch B3B0643 - EPA 1664A Preparation: EPA 1664 Oil and Grease Prep 02/21/23 06:34

Blank (B3B0643-BLK1)				Analyzed: 02/21/23 07:15						
Total Oil & Grease	ND	5.0	mg/L							
LCS (B3B0643-BS1)				Analyzed: 02/21/23 07:15						
Total Oil & Grease	42.1	5.0	mg/L	40.0		105	78-114			
LCS Dup (B3B0643-BSD1)				Analyzed: 02/21/23 07:15						
Total Oil & Grease	41.3	5.0	mg/L	40.0		103	78-114	2	18	

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Mustang Renewable Power Ventures
14470 Calle Real
Goleta CA, 93117

Project: MRPV-ADF
Project Number: R.O.V.D.
Project Manager: Dylan Ellis

WO & Reported:
2300847
02/22/2023 19:12

Sample Method Summary

Analysis	Method	Matrix	Laboratory & Certification
Anions by IC			
Nitrate as N by EPA 300.0	EPA 300.0	Water	OEC, CA-ELAP,NELAP
Nitrite as N by EPA 300.0	EPA 300.0	Water	OEC, CA-ELAP,NELAP
General Chemistry Parameters by EPA or APHA Standard Methods			
Oil and Grease by EPA 1664	EPA 1664A	Water	OEC, CA-ELAP,NELAP
pH Sample Temperature	EPA 170.1/SM 2550B	Water	OEC, Internal
9040B pH	EPA 9040B/SM4500H+ B	Water	OEC, Internal
Solids, Total Suspended (TSS), SM2540D	SM 2540D	Water	OEC, CA-ELAP,NELAP
Phosphorus, Total as P by SM4500-P B,E/EPA 365.3	SM 4500-P B,E / EPA 365.3	Water	OEC, Internal
COD, Chemical Oxygen Demand	SM 5220D	Water	OEC, CA-ELAP,NELAP
Microbiological Parameters by APHA Standard Methods			
E.coli QT MPN SM9223B	SM 9223B	Water	OEC, Internal
Total Metals by ICP			
200.7 Total Iron	EPA 200.7	Water	OEC, CA-ELAP,NELAP

Notes and Definitions

Qualifier	Definition
MDL	Method Detection Limit
RL	Reporting Limit (Quantitation Limit)
ND	Analyte NOT DETECTED at or above the method limit (MDL)
RPD	Relative Percent Difference
HT-09	This sample was received outside of the EPA recommended holding time.
HT-pH	Water pH should be analyzed within 15 minutes of sampling. Soil pH should be analyzed as soon as possible.

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Oilfield Environmental & Compliance, Inc.

Mustang Renewable Power Ventures
14470 Calle Real
Goleta CA, 93117

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Project Number: R.O.V.D.
Project Manager: Dylan Ellis

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2300847
02/22/2023 19:12

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 101 Adkisson Way, Taft, CA 93268 Phone: (661) 762-9143

OEC Work Order (Lab Use Only)

2300847

CHAIN OF CUSTODY

Rev 02/09/2021

Page 1 of 1

Company: Mustang Renewable Power Ventures				Project Name / No: MRPV-ADF							
Address: 14470 Calle Real-ADF, Goleta, CA 93117				Site: ADF		PO #:					
Phone: 805-914-9372		Email: dylan@mustangrpv.com		Comments:							
Report To: Dylan Ellis		Sampler (Print): Dylan Ellis		Bacteriological Sample Type: Routine <input checked="" type="checkbox"/> Repeat <input type="checkbox"/> Replacement <input type="checkbox"/> Other <input type="checkbox"/>							
Report Format(s): PDF(std) <input checked="" type="checkbox"/> EDD <input type="checkbox"/> EDF ⁽¹⁾ <input type="checkbox"/> WellSTAR ⁽¹⁾ <input type="checkbox"/> LTS ⁽¹⁾ <input type="checkbox"/> OTHER (Custom) EDD <input type="checkbox"/> ⁽¹⁾ EDF Global ID/Log Code, LTS(SDWIS) PWS: WellSTAR Facility / API# / Entity#:				Analysis Requested							
Requested Turnaround Time [TAT]: (Surcharges apply to any TAT other than 'Standard'): ASAP <input type="checkbox"/> 1 Day <input type="checkbox"/> 2 Day <input type="checkbox"/> 3 Day <input type="checkbox"/> 5 Day <input type="checkbox"/> Standard <input checked="" type="checkbox"/>				Special Instructions All requests subject to OEC Terms & Conditions.							
* A =air/vapor, P =product/oil, S =solid/sediment, Waters (DW =drinking, GW =ground, PW=produced, WW =waste)											
Lab Use Only	Sampled Date & Time	Matrix*	# of Cont.	Sample ID	TSS	COD	Oil & Grease	Total Iron	Nitrate+Nitrite as N	E. Coli	Total Phosphorus
01	2/1/23 1:30P		1	R.O.V.D. TSS	X						
	2/1/23 1:30P		1	R.O.V.D. COD		X					
	2/1/23 1:30P		1	R.O.V.D. O&G			X				
	2/1/23 1:30P		1	R.O.V.D. TI				X			
	2/1/23 1:30P		1	R.O.V.D. N+N					X		
	2/1/23 1:30P		1	R.O.V.D. EC						X	
	2/1/23 1:30P		1	R.O.V.D. TP							X
											4.9°
Relinquished by (Signature): <i>Matthew Padilla</i>		Relinquished by (Print Name & Company): MULAN AUGHER MARBURY		Date: 2/2/23	Time: 11:05AM	Received by (Signature): <i>Matthew Padilla</i>		Received by (Print Name & Company): Matthew Padilla OEC 1105			
Matthew Padilla		Matthew Padilla OEC		Date: 2/2/23	Time: 1210	Received by (Signature): <i>Greg Reed</i>		Received by (Print Name & Company): Greg Reed OEC			

pH Field Test: 7.86



Sample Receipt

Work Order Review is Complete

Work Order

2300847

Refresh

Client Name	Temp °C	Refrigerator(s)	COC Received	Login
Mustang Renewable Power Ventures	4.9	8	02/02/2023 12:10	02/02/2023 13:47

Recorded Corrected, Acceptable Range 0°C to 6°C (See Exception Notes Below)

Sample Transport

OEC Courier/Sampler
 After Hours Drop Off
 Delivery (Other than OEC)
 Shipment Carrier
 Tracking#

Custody Seals None Present

Cooler(s) Present, Intact Present, Not Intact None

Sample(s) Present Intact Present, Not Intact None

Condition/Preservation

Yes No N/A

<input checked="" type="checkbox"/>	Received On Ice Within Range (Acceptable)	Completed COCs Received with Sample(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Received Outside Range(Acceptable)	Correct Container(s) Preserve for Analysis	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Direct from Field on Ice	Container(s) Intact and Good Condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Ambient: Air or Filter Matrix	Container Label(s) Consistent with COC	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Received Ambient, Placed on Ice	OEC Preservation Added**	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	Sample Temperature Accetable for Analysis	Sample Quantity Sufficient	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Received Outside Range [Exception]*			
<input type="checkbox"/>	Insufficient Ice or Unknown			
<input type="checkbox"/>	Excessive Free Liquid			

Containers, COC Changes, And/Or Corrections

Container ID (COC)	Container Description	Home	Matrix	Preservative	pH/Chlorine/Sulfur	Comments
01A	1000mL Glass (Amber) HCl	Fridge 8 - Walk-In	Water			
01B	1000mL Poly	Fridge 8 - Walk-In	Water			
01C	250mL Poly	Fridge 8 - Walk-In	Water			
01D	500mL Poly H2SO4	Fridge 8 - Walk-In	Water			
01E	250mL Poly HNO3	Fridge 8 - Walk-In	Water			
01F	250mL Poly HNO3	Fridge 8 - Walk-In	Water			
01G	125mL Bacti Poly Na2S2O3, sterile (100mL fill)	Micro-Bio Fridge	Water			

Receipt Login By:

GSR-02/02/23 02:02

Receipt Reviewed By:

EMQ-02/02/23 03:42

ATTACHMENT E

Central Coast Regional Water Quality Control Board Notice of Violation
Letter dated March 17, 2023



Central Coast Regional Water Quality Control Board

March 17, 2023

SENT VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7020 1810 0002 0768 1810

John Dewey
Chief Executive Officer
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza Drive, Suite 200
Newport Beach, CA 92660
john@deweygroup.com

Dear John Dewey,

ENFORCEMENT PROGRAM: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY – NOTICE OF VIOLATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify Mustang Renewable Power Ventures, LLC (Discharger) of alleged violations of state law at its Tajiguas Compost Management Unit (Facility) located at 14470 Calle Real in Goleta, require a written response describing the actions taken or planned to be taken to address violations and prevent future violations, and explain the potential civil administrative liability for non-compliance with state and federal laws, including unauthorized discharges of waste to waters of the state and waters of the United States.

Background

The Discharger is enrolled General Waste Discharge Requirements for Commercial Composting Operations Order 2020-0012-DWQ ([Compost General Order](#)). The Facility is also a postclosure land use at the Tajiguas Landfill, which is owned and operated by the County of Santa Barbara (County).

On June 11, 2021, the Central Coast Water Board issued the Discharger a notice of applicability ([NOA](#)) to enroll the Facility in the Compost General Order. The NOA included approval of the Discharger's Water and Wastewater Management Plan, which is included in the Facility's [technical report](#). The approved Water and Wastewater Management Plan details operational procedures to prevent wastewater from

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

discharging from the Facility. The Compost General Order defines wastewater as “leachate or any other liquid flowing from, or on the working surface” and leachate as “any liquid formed by the drainage of liquids from, or percolation/flow of liquids through any feedstock, additive, amendment, or compost (active, curing, or final product) pile” (Compost General Order Attachment A). Due to concerns about the discharge of wastewater from the Facility based on previous inspections on [December 5, 2022](#), and [January 25, 2023](#), and from conversations with the Discharger and County staff, Central Coast Water Board staff conducted a Facility [inspection on March 13, 2023](#).

Alleged Violations

Based on information provided by Mustang Renewable Power Ventures, LLC staff and County staff and information from site inspections the Discharger has violated the following conditions of the Compost General Order at the Facility:

1. The Discharger has not managed wastewater in accordance with the Facility’s approved Water and Wastewater Management Plan, which is a violation of Compost General Order Specification 6. These violations include not implementing the following procedures included in the approved Water and Wastewater Management Plan:
 - a. The Water and Wastewater Management Plan indicates that before bypassing runoff from the compost working surface as clean stormwater, operators would first fully cover the compost with waterproof tarpaulins, place wattles between compost rows, and sweep the isles between windrows. During recent runoff diversion, the compost windrows and piles were not fully covered, the aisles were not fully swept to remove compost/waste from the exposed working surface areas, and wattles were not placed between all windrows. Thus, working surface runoff from the March 10, 2023, storm contacted compost/waste, which discharged from the Facility as wastewater. Mustang Renewable Power Ventures, LLC staff and County staff indicated that this water was diverted during the March 10, 2023, storm to the north sedimentation basin, which ultimately discharged to Pila Creek.
 - b. The approved Water and Wastewater Management Plan indicates that wattles would be placed at the stormwater drainage inlets at all times. During the [March 13, 2023, inspection](#) there were no wattles surrounding the northern drainage inlet.
 - c. The approved Water and Wastewater Management Plan includes requirements to sample and test each time runoff is bypassed to the Landfill north sedimentation basin instead of being captured as wastewater within the onsite tanks. Based on conversations with Mustang Renewable Power Ventures, LLC staff and County staff, samples were not taken during previous diversion events where water was discharged to the Landfill north sedimentation basin as required by the approved Water and Wastewater Management Plan, such as diversion

during the January 9, 2023, storm event. Another diversion event, where samples were not collected, occurred during the December 27-29, 2021 storm event, which was documented in the [March 2022 Annual Report](#). Conversations with the Mustang Renewable Power Ventures, LLC staff and County staff indicate that there may be additional bypass/discharges after work hours because there are no sensors, flow meters, or other triggers to alert operators of an overflow or bypass.

2. The Discharger has discharged waste (wastewater) to surface water (Pila Creek) without authorization from an NPDES permit. This is a violation of Compost General Order Prohibition 6. The Industrial General Permit (IGP) is a stormwater permit and does not authorize the discharge of wastewater, which is defined above. IGP requirements and potential violations are not discussed in this letter.
3. The Discharger discharged feedstock and compost outside of the designated composting operation areas that are specified in the technical report. This is a violation of Compost General Order Prohibition 1 and Specification 4. This includes compost found under the conveyer system that connects the anaerobic digestion facility (ADF) to the compost Facility, as documented in the [March 13, 2023, inspection report](#). This includes compost found on the densitometer table working surface area, which according to the approved technical report, was designed to include a berm surrounding the working surface to prevent compost impacted wastewater from discharging from the Facility. The lack of berm installation was documented by the Discharger in a [February 8, 2023, report](#). Central Coast Water Board staff did not approve this report as an official technical report addendum and responded to the Discharger via email on February 8, 2023, indicating concerns about wastewater potentially discharging from this area. This correspondence as well as documentation of compost/waste on the densitometer table working surface, is included in the [March 13, 2023, inspection report](#).
4. The Discharger has not maintained Facility berms in good working condition and has not prevented erosion and damage to the berms, as documented in recent inspection reports. This is a violation of Compost General Order Specification 10 and Maintenance Requirement 1.
5. The Discharger has not maintained the drainage conveyance systems to convey wastewater in a manner that prevents conditions resulting in contamination, pollution, or nuisance. The piping and connections that makes up the drainage conveyance system continues to leak wastewater to areas outside of the Facility, as documented in recent inspection reports. This is a violation of Compost General Order Specification 11.
6. The Discharger has not implemented sufficient corrective actions to address previous noncompliance, such as making timely and successful repairs or replacements to the wastewater/stormwater pipes. This is a violation of Compost General Order Additional Requirement 2.

7. The Discharger has not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of wastewater discharges from the Facility, including the wastewater discharge resulting from the January 9, 2023, storm event. The Compost General Order includes reporting requirements including estimating the volume of wastewater when there is a discharge, which must be submitted in a report to Central Coast Water Board staff within 10 working days of noncompliance. This is a violation of Compost General Order Monitoring and Reporting section B.3 and Compost General Order Notification Requirement 4.
8. Facility feedstocks listed in the notice of intent and Technical Report are green material and anaerobic digestate. The Compost General Order requires that anaerobic digestate be derived from allowable Tier 2 feedstocks. Additionally, the Compost General Order defines anaerobic digestate as, "the solid portion of the material remaining after the anaerobic digestion of any combination of agricultural materials, biosolids, sewage sludge, food materials, green materials, manure, paper materials, or vegetative food materials. Dewatered digestate contains organic matter that may need to be further treated to stabilize it, usually through aerated composting." The Compost General Order prohibits any feedstock, additive, or amendment other than those specifically described in the Compost General Order, unless approved by the Regional Water Board. Based on information provided by the Discharger via email on March 15, 2023, and presented in the [March 13, 2023, inspection report](#) including the March 15, 2023, email as attachment 1 and inspection photos, feedstock at the site contain significant amounts of inorganic contaminants including glass and plastics, which are not approved feedstocks, additives, or amendments, nor are these materials compostable. This is a violation of Compost General Order Prohibition 3 and 4 and Specification 7. The Discharger must comply with the Compost General Order and ensure that only approved feedstocks are stored and/or composted at the Facility. For a full list of approved Tier 1 and 2 feedstocks allowed in anaerobic digestate, please see Compost General Order Table 2."

Immediate corrective actions must be taken to address the violations listed above and actions must be taken to ensure that future operations meet the conditions of the Compost General Order and the approved Water and Wastewater Management Plan.

Requirements for Written Response to Alleged Violations

The Discharger must address the alleged violations described above immediately and must **submit by April 3, 2023**, a written response describing the actions taken or planned to address the above alleged violations and prevent future violations. For violations that the Discharger has not addressed immediately, the response must include a time schedule for corrective actions to bring the compost Facility into compliance with the requirements of the Compost General Order.

Responses must be submitted electronically to: Jordan.haserot@waterboards.ca.gov.

Tajiguas Compost Management Unit
Notice of Violation

- 5 -

March 17, 2023

This notice of violation is intended to facilitate a timely remedy to address the Discharger's alleged Compost General Order violations. Central Coast Water Board staff will determine the need to recommend further enforcement actions based upon the Discharger's responses and future compliance with the Compost General Order.

Potential Administrative Civil Liability

The Discharger is hereby on notice that California Water Code (Water Code) section 13350 provides that any person who intentionally or negligently violates any conditions issued or amended by the Regional Water Board or State Water Board, is subject to administrative civil liability of up to \$5,000 per day of violation or \$10 per gallon of waste discharged. Alternatively, the superior court may impose civil liability for each violation of up to \$15,000 per day or \$20 per gallon of waste discharged.

The Discharger does not have a permit to discharge pollutants to waters of the United States. Unpermitted discharges of pollutants to waters of the United States are violations of federal Clean Water Act (Clean Water Act) section 301. Clean Water Act section 301 violations are subject to liability under Water Code section 13385, which authorizes the Central Coast Water Board to impose administrative civil liability of up to \$10,000 per day of violation and \$10 per gallon discharged but not cleaned up over 1,000 gallons. Alternatively, a court may impose civil liability of up to \$25,000 for each day the violation occurs, and up to \$25 per gallon of waste discharged but not cleaned up over 1,000 gallons.

Furthermore, the Central Coast Water Board reserves the right to take any enforcement action authorized by law including, but not limited to, termination of the Compost General Order coverage (Compost General Order Additional Requirement 1) which may result from any noncompliance with Compost General Order requirements, and would require the Discharge to implement a closure plan to perform site restoration as outlined in the Facility's Technical Report.

If you have any questions, please feel free to contact Jordan Haserot by phone at (805) 542-4781 or email at jordan.haserot@waterboards.ca.gov, or Ryan Lodge at (805) 549-3506.

Sincerely,

for Thea S. Tryon
Assistant Executive Officer

Tajiguas Compost Management Unit
Notice of Violation

- 6 -

March 17, 2023

cc:

John Kular, johnkularpe@gmail.com

Jeanette Gonzales-Knight, jgonzal@countyofsb.org

Travis Spier, tspier@countyofsb.org

Christina Wilder, cwilder@countyofsb.org

Norma Campos Bernal, norma.camposbernal@sbcphd.org

Angela Schroeter, angela.schroeter@waterboards.ca.gov

Ryan Lodge, ryan.lodge@waterboards.ca.gov

Jordan Haserot, jordan.haserot@waterboards.ca.gov

Thea Tryon, Thea.Tryon@waterboards.ca.gov

Tamara Anderson, Tamara.Anderson@waterboards.ca.gov

Todd Stanley, Todd.Stanley@waterboards.ca.gov

Jesse Woodard, Jesse.Woodard@Waterboards.ca.gov

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Managemenet Unit NOV.docx

GeoTracker ID: T10000017039

CIWQS Place ID: 874811



Scott D. McGolpin
Public Works Director

Marty Wilder
Interim Deputy Director

April 25, 2023

John Dewey, CEO & Managing Member
MSB Investors, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Email: john@deweygroup.com

[US mail and emailed]

SUBJECT: Notice of Intent to Assess Liquidated Damages for Failure to Comply with Central Coast Regional Water Quality Control Compost General Order and Summary of Liquidated Damages

Mr. John Dewey,

The Agreement between MSB Investors, LLC (MSB) and the County of Santa Barbara (County) for the development and operation of the Tajiguas Resource Recovery Project (Project, also referred to as the ReSource Center) sets forth liquidated damages at varying amounts in Exhibit D.

Section 5.8.E of the Agreement requires that the, "Contractor shall use Good Industry Practice in managing and monitoring the water, wastewater and storm water at the Facility." Additionally, Section 5.8.H of the Agreement states that the, "Contractor shall perform all the requirements to comply with all federal, State, City and any other governmental unit Permits, orders, licenses, approvals and CEQA mitigations required by Applicable Law for the Facility". Per Section 5.8 of the Agreement, "the County may assess liquidated damages in accordance with Section 14.9 and Exhibit D: Liquidated Damages for failure to prevent nuisances as described in this Section 5.8".

The Central Coast Regional Water Quality Control Board's Notices of Violation letter dated March 17, 2023 can be found in Attachment A and lists the eight Compost General Order requirements that MSB failed to comply with at the ReSource Center.

Failure to meet these requirements, as provided in Section 5.8 and Exhibit D of the Agreement, results in liquidated damages of \$500 per day per incident until resolved. **The County will begin assessing liquidated damages associated with each violation effective April 26, 2023.**

In accordance with Section 14.9.B of the Agreement, this Notice is hereby provided to MSB that the ongoing non-compliance with Central Coast Regional Water Quality Control Compost General Order will trigger the accrual and assessment of liquidated damages. Ongoing violations, as noted in Attachment A violations 3, 4, 5, 6, and 8 will result in daily assessments until the violation is remedied. Pursuant to Section 14.9, MSB may, within ten days after receiving this Notice, request a meeting with Jeanette Gonzales-Knight to present oral or written evidence relevant to these ongoing conditions.



John Dewey, CEO & Managing Member
MSB Investors, LLC
April 25, 2023
Page 2 of 3

The County reserves its right to assess additional liquidated damages in accordance with Section 5.8 and Exhibit D based on MSB's failure to comply with the Agreement, and to seek any other remedies available to resolve said failures. In addition to the liquidated damages, MSB is responsible for remedying the issues and any additional costs to County.

As of April 24, 2023, the following is a summary of the liquidated damages assessed against MSB, totaling \$2,967,000, and their status:

- Failure to comply with the Project's SBCAPCD permit by bringing a diesel-powered trommel screen to the site on June 3, 2022 – effective July 5, 2022. Total liquidated damages for this violation amount \$500.
- Failure to meet project milestones for ADF/Composting Management Unit (CMU) Acceptance Test by December 21, 2021 – effective August 1, 2022 and resolved on October 27, 2022. Total liquidated damages of \$5,000 per day per missed milestone date amount to \$435,000.
- Failure to meet project milestones for Start Up Test and Acceptance Test Requirements per Section 4.8.B of the Agreement by December 21, 2021 – effective August 1, 2022 and resolved on March 1, 2023. Total liquidated damages of \$5,000 per day per missed milestone date amount to \$1,060,000.
- Failure to meet project milestones for Permit to Operate applications required under Santa Barbara County Air Pollution Control District (SBCAPCD) Authority to Construct Permit Modification No. 14500-05 – effective August 1, 2022 and not resolved. Liquidated damages of \$5,000 per day per missed milestone date amount to \$1,330,000 as of April 24, 2023 and will continue to be assessed until resolved.
- 14 CCR 17863.4 – Odor Impact Minimization Plan – 9/21/22 and 10/19/22 Compostable Materials Handling Operation and Facility Inspections – effective November 18, 2022 and resolved on November 30, 2022. Total liquidated damages of \$500 per day per stated violation amount to \$6,000 for this violation.
- 14 CCR 17896.31 - ADF - Failure to comply with OIMP – effective February 6, 2023 and not resolved. Liquidated damages of \$500 per day per stated violation amount to \$38,500 as of April 24, 2023 and will continue to be assessed until resolved.
- 14 CCR 17896.32 - ADF - Odor and Nuisance Control – effective February 6, 2023 and not resolved. Liquidated damages of \$500 per day per stated violation amount to \$38,500 as of April 24, 2023 and will continue to be assessed until resolved.
- 14 CCR 17867(a)(2) - CMU - Odor Control – effective February 6, 2023 and not resolved. Liquidated damages of \$500 per day per stated violation amount to \$38,500 as of April 24, 2023.

John Dewey, CEO & Managing Member
MSB Investors, LLC
April 25, 2023
Page 3 of 3

- Failed Acceptance Test – effective April 14, 2023 and not resolved. Liquidated damages of \$2,000 per day until remedied amount to \$20,000 as of April 24, 2023 and will continue to be assessed until resolved.

Thank you for your cooperation in implementing the necessary actions to comply with all regulatory requirements.

Sincerely,

DocuSigned by:

E31DF199C737496...

Jeanette Gonzales-Knight, PE
Compliance Manager, Santa Barbara County Public Works Department

cc: Scott McGolpin, Santa Barbara County Public Works Department
Marty Wilder, Santa Barbara County Public Works Department
Carlyle Johnston, Santa Barbara County Public Works Department

Attachment A: Central Coast Regional Water Quality Control Board Notice of Violation Letter dated March 17, 2023

Attachment B: John Kular Consulting response on behalf of Mustang Renewable Power Ventures, LLC, submitted March 21, 2023 and March 30, 2023

Attachment A

Central Coast Regional Water Quality Control Board
Notice of Violation Letter dated March 17, 2023



Central Coast Regional Water Quality Control Board

March 17, 2023

SENT VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7020 1810 0002 0768 1810

John Dewey
Chief Executive Officer
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza Drive, Suite 200
Newport Beach, CA 92660
john@deweygroup.com

Dear John Dewey,

ENFORCEMENT PROGRAM: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY – NOTICE OF VIOLATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify Mustang Renewable Power Ventures, LLC (Discharger) of alleged violations of state law at its Tajiguas Compost Management Unit (Facility) located at 14470 Calle Real in Goleta, require a written response describing the actions taken or planned to be taken to address violations and prevent future violations, and explain the potential civil administrative liability for non-compliance with state and federal laws, including unauthorized discharges of waste to waters of the state and waters of the United States.

Background

The Discharger is enrolled General Waste Discharge Requirements for Commercial Composting Operations Order 2020-0012-DWQ ([Compost General Order](#)). The Facility is also a postclosure land use at the Tajiguas Landfill, which is owned and operated by the County of Santa Barbara (County).

On June 11, 2021, the Central Coast Water Board issued the Discharger a notice of applicability ([NOA](#)) to enroll the Facility in the Compost General Order. The NOA included approval of the Discharger's Water and Wastewater Management Plan, which is included in the Facility's [technical report](#). The approved Water and Wastewater Management Plan details operational procedures to prevent wastewater from

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

discharging from the Facility. The Compost General Order defines wastewater as “leachate or any other liquid flowing from, or on the working surface” and leachate as “any liquid formed by the drainage of liquids from, or percolation/flow of liquids through any feedstock, additive, amendment, or compost (active, curing, or final product) pile” (Compost General Order Attachment A). Due to concerns about the discharge of wastewater from the Facility based on previous inspections on [December 5, 2022](#), and [January 25, 2023](#), and from conversations with the Discharger and County staff, Central Coast Water Board staff conducted a Facility [inspection on March 13, 2023](#).

Alleged Violations

Based on information provided by Mustang Renewable Power Ventures, LLC staff and County staff and information from site inspections the Discharger has violated the following conditions of the Compost General Order at the Facility:

1. The Discharger has not managed wastewater in accordance with the Facility’s approved Water and Wastewater Management Plan, which is a violation of Compost General Order Specification 6. These violations include not implementing the following procedures included in the approved Water and Wastewater Management Plan:
 - a. The Water and Wastewater Management Plan indicates that before bypassing runoff from the compost working surface as clean stormwater, operators would first fully cover the compost with waterproof tarpaulins, place wattles between compost rows, and sweep the isles between windrows. During recent runoff diversion, the compost windrows and piles were not fully covered, the aisles were not fully swept to remove compost/waste from the exposed working surface areas, and wattles were not placed between all windrows. Thus, working surface runoff from the March 10, 2023, storm contacted compost/waste, which discharged from the Facility as wastewater. Mustang Renewable Power Ventures, LLC staff and County staff indicated that this water was diverted during the March 10, 2023, storm to the north sedimentation basin, which ultimately discharged to Pila Creek.
 - b. The approved Water and Wastewater Management Plan indicates that wattles would be placed at the stormwater drainage inlets at all times. During the [March 13, 2023, inspection](#) there were no wattles surrounding the northern drainage inlet.
 - c. The approved Water and Wastewater Management Plan includes requirements to sample and test each time runoff is bypassed to the Landfill north sedimentation basin instead of being captured as wastewater within the onsite tanks. Based on conversations with Mustang Renewable Power Ventures, LLC staff and County staff, samples were not taken during previous diversion events where water was discharged to the Landfill north sedimentation basin as required by the approved Water and Wastewater Management Plan, such as diversion

during the January 9, 2023, storm event. Another diversion event, where samples were not collected, occurred during the December 27-29, 2021 storm event, which was documented in the [March 2022 Annual Report](#). Conversations with the Mustang Renewable Power Ventures, LLC staff and County staff indicate that there may be additional bypass/discharges after work hours because there are no sensors, flow meters, or other triggers to alert operators of an overflow or bypass.

2. The Discharger has discharged waste (wastewater) to surface water (Pila Creek) without authorization from an NPDES permit. This is a violation of Compost General Order Prohibition 6. The Industrial General Permit (IGP) is a stormwater permit and does not authorize the discharge of wastewater, which is defined above. IGP requirements and potential violations are not discussed in this letter.
3. The Discharger discharged feedstock and compost outside of the designated composting operation areas that are specified in the technical report. This is a violation of Compost General Order Prohibition 1 and Specification 4. This includes compost found under the conveyer system that connects the anaerobic digestion facility (ADF) to the compost Facility, as documented in the [March 13, 2023, inspection report](#). This includes compost found on the densitometer table working surface area, which according to the approved technical report, was designed to include a berm surrounding the working surface to prevent compost impacted wastewater from discharging from the Facility. The lack of berm installation was documented by the Discharger in a [February 8, 2023, report](#). Central Coast Water Board staff did not approve this report as an official technical report addendum and responded to the Discharger via email on February 8, 2023, indicating concerns about wastewater potentially discharging from this area. This correspondence as well as documentation of compost/waste on the densitometer table working surface, is included in the [March 13, 2023, inspection report](#).
4. The Discharger has not maintained Facility berms in good working condition and has not prevented erosion and damage to the berms, as documented in recent inspection reports. This is a violation of Compost General Order Specification 10 and Maintenance Requirement 1.
5. The Discharger has not maintained the drainage conveyance systems to convey wastewater in a manner that prevents conditions resulting in contamination, pollution, or nuisance. The piping and connections that makes up the drainage conveyance system continues to leak wastewater to areas outside of the Facility, as documented in recent inspection reports. This is a violation of Compost General Order Specification 11.
6. The Discharger has not implemented sufficient corrective actions to address previous noncompliance, such as making timely and successful repairs or replacements to the wastewater/stormwater pipes. This is a violation of Compost General Order Additional Requirement 2.

7. The Discharger has not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of wastewater discharges from the Facility, including the wastewater discharge resulting from the January 9, 2023, storm event. The Compost General Order includes reporting requirements including estimating the volume of wastewater when there is a discharge, which must be submitted in a report to Central Coast Water Board staff within 10 working days of noncompliance. This is a violation of Compost General Order Monitoring and Reporting section B.3 and Compost General Order Notification Requirement 4.
8. Facility feedstocks listed in the notice of intent and Technical Report are green material and anaerobic digestate. The Compost General Order requires that anaerobic digestate be derived from allowable Tier 2 feedstocks. Additionally, the Compost General Order defines anaerobic digestate as, "the solid portion of the material remaining after the anaerobic digestion of any combination of agricultural materials, biosolids, sewage sludge, food materials, green materials, manure, paper materials, or vegetative food materials. Dewatered digestate contains organic matter that may need to be further treated to stabilize it, usually through aerated composting." The Compost General Order prohibits any feedstock, additive, or amendment other than those specifically described in the Compost General Order, unless approved by the Regional Water Board. Based on information provided by the Discharger via email on March 15, 2023, and presented in the [March 13, 2023, inspection report](#) including the March 15, 2023, email as attachment 1 and inspection photos, feedstock at the site contain significant amounts of inorganic contaminants including glass and plastics, which are not approved feedstocks, additives, or amendments, nor are these materials compostable. This is a violation of Compost General Order Prohibition 3 and 4 and Specification 7. The Discharger must comply with the Compost General Order and ensure that only approved feedstocks are stored and/or composted at the Facility. For a full list of approved Tier 1 and 2 feedstocks allowed in anaerobic digestate, please see Compost General Order Table 2."

Immediate corrective actions must be taken to address the violations listed above and actions must be taken to ensure that future operations meet the conditions of the Compost General Order and the approved Water and Wastewater Management Plan.

Requirements for Written Response to Alleged Violations

The Discharger must address the alleged violations described above immediately and must **submit by April 3, 2023**, a written response describing the actions taken or planned to address the above alleged violations and prevent future violations. For violations that the Discharger has not addressed immediately, the response must include a time schedule for corrective actions to bring the compost Facility into compliance with the requirements of the Compost General Order.

Responses must be submitted electronically to: Jordan.haserot@waterboards.ca.gov.

Tajiguas Compost Management Unit
Notice of Violation

- 5 -

March 17, 2023

This notice of violation is intended to facilitate a timely remedy to address the Discharger's alleged Compost General Order violations. Central Coast Water Board staff will determine the need to recommend further enforcement actions based upon the Discharger's responses and future compliance with the Compost General Order.

Potential Administrative Civil Liability

The Discharger is hereby on notice that California Water Code (Water Code) section 13350 provides that any person who intentionally or negligently violates any conditions issued or amended by the Regional Water Board or State Water Board, is subject to administrative civil liability of up to \$5,000 per day of violation or \$10 per gallon of waste discharged. Alternatively, the superior court may impose civil liability for each violation of up to \$15,000 per day or \$20 per gallon of waste discharged.

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Furthermore, the Central Coast Water Board reserves the right to take any enforcement action authorized by law including, but not limited to, termination of the Compost General Order coverage (Compost General Order Additional Requirement 1) which may result from any noncompliance with Compost General Order requirements, and would require the Discharge to implement a closure plan to perform site restoration as outlined in the Facility's Technical Report.

If you have any questions, please feel free to contact Jordan Haserot by phone at (805) 542-4781 or email at jordan.haserot@waterboards.ca.gov, or Ryan Lodge at (805) 549-3506.

Sincerely,

for Thea S. Tryon
Assistant Executive Officer

Tajiguas Compost Management Unit
Notice of Violation

- 6 -

March 17, 2023

cc:

John Kular, johnkularpe@gmail.com

Jeanette Gonzales-Knight, jgonzal@countyofsb.org

Travis Spier, tspier@countyofsb.org

Christina Wilder, cwilder@countyofsb.org

Norma Campos Bernal, norma.camposbernal@sbcphd.org

Angela Schroeter, angela.schroeter@waterboards.ca.gov

Ryan Lodge, ryan.lodge@waterboards.ca.gov

Jordan Haserot, jordan.haserot@waterboards.ca.gov

Thea Tryon, Thea.Tryon@waterboards.ca.gov

Tamara Anderson, Tamara.Anderson@waterboards.ca.gov

Todd Stanley, Todd.Stanley@waterboards.ca.gov

Jesse Woodard, Jesse.Woodard@Waterboards.ca.gov

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Managemenet Unit NOV.docx

GeoTracker ID: T10000017039

CIWQS Place ID: 874811

Attachment B

John Kular Consulting response on behalf of Mustang Renewable Power Ventures, LLC, submitted March 21, 2023 and March 30, 2023

JOHN KULAR CONSULTING

March 20, 2023

Ryan Lodge
RWQCB Region 3
895 Aerovista Place
San Luis Obispo, CA 93401

Re: Notice of Violation of March 17, 2023
Tajiguas Resource Center Compost Management Unit
14470 Calle Real, Gaviota, CA 93117
Permit R3-2020-012
Geotracker ID T10000017039

Dear Ryan:

This letter outlines the measures that the operator of the Tajiguas Resource Center will be taking to resolve the issues raised in the March 17th NOV. It also attempts to clarify some of the allegations made in the NOV and the circumstances that led to the alleged and actual violations.

Prior to addressing the specific comments, we wish to note that the winter of 2022/2023 has been the wettest on record in at least 40 years. As this memo is being written, the cumulative 22/23 winter rainfall for Gaviota Coast weather station indicates 31.72 inches rainfall depth. Drainage features have been overwhelmed and have failed across the entire state. In fact, the Governor's 3/1/23 Proclamation of a State of Emergency specifically states that the damaging winds and historic precipitation have occurred and continue to threaten critical infrastructure. The NOV allegations should be considered within this context.

The intensity and frequency of the storms have greatly hindered the Resource Center's operator from making permanent, durable repairs to facilities and equipment in the brief intervals between rainfall events. The operator is committed to improving its wet weather preparations including the physical infrastructure as well as the training and supervision of the operational staff.

Allegation 1a. - Inadequate cover of compost prior to and during the rainfall event of March 13, 2023. The site inspection photos clearly indicate flaws in the pre-storm site preparations. Unfortunately, on February 11, 2023, the site experienced extremely high winds (measured at 54 mph) which tore many of the site tarpaulins. New tarpaulins were ordered but did not arrive on site prior to 3/13/23. Site operations staff were authorized to purchase tarps from the local building supply store on 3/12/23 but underestimated the quantity they needed to purchase. Better staff training for wet weather preparation is clearly needed for all staff, not just environmental compliance and management staff. A training session will be scheduled imminently.

890 Lindamere Ct.
Simi Valley, CA 93065
661.302.1292

www.kularconsult.com

Allegation 1b. – Damaged berms. The damaged asphalt surface and asphalt berms were noted by the on-site Environmental Compliance Manager in monthly IGP inspections. Asphalt repairs were conducted in September 2023 and additional asphalt repairs for damage that occurred since then are tentatively scheduled for the week of April 15, weather permitting.

Allegation 1c. – Inadequate maintenance of drainage conveyance systems. The wind event of 2/11/23 also caused several segments of the 24-inch HDPE stormwater pipes to become dislodged. The repair was completed on 2/21/23. The operator has a plan to extend the stormwater collection system further west on the CMU deck after the rainy season. The storm water extension will be made with fused HDPE pipe rather than jointed pipe. The problematic jointed pipe between the CMU deck and the Baker tanks will also be replaced with fused pipe at the same time.

Allegation 1c. – Clarification: The site SCADA system is capable of indicating when overflows occur at the CMU Baker tanks and CMU SW storage tank by virtue of its water level indicators. Bypass of the stormwater collection system can only be made by the operator physically opening the bypass valve. Therefore, idle speculation about additional unknown bypasses should be disregarded.

Allegation 2. – Unauthorized discharge did occur because the compost was not adequately covered and the site was not adequately cleaned prior to and during the 3/13/23 storm. The purchase of additional tarps plus additional staff training are intended to prevent a recurrence of this circumstance.

Allegation 3. – The operator did fail to clean up compost which fell from the ADF conveyor. Clarification: The circumstance of the deletion of the berm around the Baker Tanks was explained in our 2/8/23 memo. The Water Board reply indicated that the 2/8/23 memo was understood and that it should be uploaded to GeoTracker, and that operator should keep the area around the densimetric table clear of material. There was no indication that an addendum to the CMU Technical Report was required or that the berm deletion was not approved.

Allegation 4. – Substantially the same as Allegation 1b.

Allegation 5. – Substantially the same as Allegation 1c.

Allegation 6. – Failure to make timely and effective repairs. As discussed above, the operator has made several major repairs and also many minor repairs as required. All major repairs were completed prior to significant rainfall events. The CMU facility is located on top of recently completed landfill cells. As predicted it is undergoing rapid settlement which will slow over time. This settlement together with an extremely wet winter have made ongoing maintenance of the drainage system very challenging but the operator has not been negligent in performing maintenance duties.

JOHN KULAR CONSULTING

Allegation 7. – Inadequate reporting of non-compliance, citing 1/9/23 as an example. The 1/9/23-1/10/23 rainfall event closed US 101 and staff were not able to access the site for several days. Therefore, sampling the overflow was not possible during the storm event. The operator had been reporting all Qualifying Stormwater Events QSE's on the Water Board's SMARTS site, incorrectly assuming that such a report addressed all Water Board reporting requirements. This was corrected for the 3/9/23 event which was reported to the Water Board on 3/10/23. Please note that testing of stormwater samples may lag the event report by up to two weeks as the testing laboratory cannot assure prompt testing of unscheduled samples. Storms by their nature are unscheduled.

Allegation 8. - Unapproved feedstocks. Clarification: The inert, inorganic materials are screened out of the digestate and the compost in several steps using screens with decreasing aperture sizes. Finally, the glass and stones are removed by the densimetric table. The solid inerts provide a benefit to the composting process by enhancing air flow through the compost windrows. These substances are present during the composting process, but they are not feedstock by definition as they do not form part of the finished compost. The inerts are removed from the finished compost in accordance with US Compost Council standards. The presence of all of these materials as well as the composting and screening process were all thoroughly described in Section 7.d of the approved CMU Technical Report.

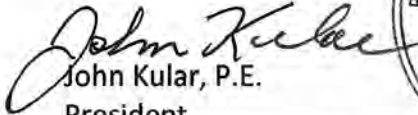
In conclusion, the operator intends to improve its compliance with the WDR order by undertaking the actions outlined in Table 1.

Table 1 – NOV Remedy Activities

Item	Activity	Timeline
1	Staff Storm Preparation Re-training	March 2023
2	Upload missing ad hoc reports to GeoTracker	March 2023
3	Improved housekeeping/storm preparation	Ongoing
4	Purchase additional tarps, repair torn tarps	March/April 2023
5	Repair leaking SW pipe joints	March/April 2023
6	Asphalt berm and surface repairs	April 2023
7	Replace jointed SW pipe with fused pipe	June 2023

We trust that this explanation and plan of action will satisfy the Board's concerns. If not, we recommend that a meeting be held to discuss any unresolved issues. Please contact the undersigned at johnkularpe@gmail.com or 661-302-1292 if you require any further information. Thank you for your consideration.

Sincerely,


John Kular, P.E.
President
John Kular Consulting



3/20/23



UPLOADING A GEO_REPORT FILE

SUCCESS

Your GEO_REPORT file has been successfully submitted!

<u>Submittal Type:</u>	GEO_REPORT
<u>Report Title:</u>	Resource Center NOV Response
<u>Report Type:</u>	Response to Comments
<u>Report Date:</u>	3/20/2023
<u>Facility Global ID:</u>	T10000017039
<u>Facility Name:</u>	Tajiguas Compost Management Unit
<u>File Name:</u>	Resource center NOV response.pdf
<u>Organization Name:</u>	John Kular Consulting
<u>Username:</u>	JOHN KULAR
<u>IP Address:</u>	172.112.20.119
<u>Submittal Date/Time:</u>	3/21/2023 2:22:20 PM
<u>Confirmation Number:</u>	4311923027

JOHN KULAR CONSULTING

March 30, 2023

Jordan Haserot
RWQCB Region 3
895 Aerovista Place
San Luis Obispo, CA 93401

Re: Notice of Violation of March 17, 2023
Follow up email of 3/27/23
Tajiguas Resource Center Compost Management Unit
14470 Calle Real, Gaviota, CA 93117
Permit R3-2020-012
Geotracker ID T10000017039

Dear Jordan:

Thank you for your email of 3/27/23. We have pasted your remarks below and our responses follow in italics.

Please provide additional clarification to your response to allegation 1.a. and 1.b:

The IGP and Compost General Order have different requirements. Please ensure that the Compost General Order notification of noncompliance requirements are followed, including notification of noncompliance with procedures within the approved Water and Wastewater Management Plan. Central Coast Water Board staff should not find out about known violations and planned improvements at the site while conducting inspections and should receive prior notification (e.g., onsite damage to critical infrastructure or equipment such as to berms, the working surface, or the drainage conveyance systems). *Agreed, the operator should inform the Water Board of these occurrences via email and Geotracker in a more timely manner. We are currently catching up on reporting past occurrence reports and will post the updates to Geotracker soon.*

Please clarify steps that will be taken to ensure that operators properly communicate with Central Coast Water Board staff when issues are noted onsite, and corrective actions are in progress. What contingency plans will be put in place to ensure that wastewater is not discharged if critical components of the Water and Wastewater Management Plan are not able to be followed? For example, inadequate tarps onsite to completely cover all compost and feedstock, or issues with sweeping to remove all compost on the un-tarped areas of the working surface. Please provide an addendum to the Water and Wastewater Management Plan to document contingencies, to ensure that wastewater is not discharged in the future. *New, larger tarps have been ordered so that the compost windrow tarps will overlap, leaving no uncovered aisles. This will allow the sweeper to concentrate its cleaning efforts on the CMU perimeter and do a more effective job. The method of holding down tarps in strong winds has also been improved by adding sand-filled PVC pipes to the tarp edges rather than sandbags so that the tarp edges can't*

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be lifted by the wind. The operators will make a greater effort allocate more space in the CMU SW tanks to accommodate the first flush from the swept CMU perimeter. In this manner the initial runoff will be retained. When a diversion occurs, it will be stormwater.

Please provide additional clarification to your response to allegation 1.c:

Your response in part states, “[t]he site SCADA system is capable of indicating when overflows occur at the CMU Baker tanks and CMU SW storage tank by virtue of its water level indicators. Bypass of the stormwater collection system can only be made by the operator physically opening the bypass valve. Therefore, idle speculation about additional unknown bypasses should be disregarded.” *On-site staff have been indiscriminate in describing offsite flows. Bypasses and overflows are very different events, but on-site staff have not been consistent in describing them as such.*

My understanding from speaking with staff onsite is that there have been bypasses or overflow events leading to offsite discharges that were not documented or reported to our office. As a reminder, the Compost General Order requires notification of violations or noncompliance within 24-48 hours of the violation depending on the severity of noncompliance and requires a written report within 10 working days of the incident. To date, we have not received any incident reports for the compost facility indicating any noncompliance or discharge events, but based on conversations with staff onsite, there have been discharge events from the site. *We are currently catching up on reporting past occurrence reports and will post the updates to Geotracker soon.*

Please clarify, if you or your staff aware of any discharge events that occurred from bypass, overflow, or other means. You must provide the dates of each of those discharge events as a response including estimated or calculated volume. *We are aware of both bypass and overflow events which will be reported via Geotracker updates and email. The level sensor in Baker Tank 1B is broken and the level sensor within Baker Tank 1A is subject to fouling by debris and inaccuracy due to its proximity to the pumps. These factors make an accurate estimate of overflows impractical. Replacement, ceiling-mounted ultrasonic level sensors have been installed and are due to be activated soon. The replacement sensors have been located so that they will not be subject to fouling or pump-induced turbulence.*

Please clarify whether the bypass valve has been shut each time staff leave the site or if the bypass valve has been left open when staff aren’t onsite. Are there sensors on the bypass valve that document when this valve is open? *The bypass valve is always left in a closed position. Unless it is opened by the operator for an intentional stormwater bypass. The duration for which it is left open depends on the rain forecast but the CMU site is supposed to be generating only stormwater runoff when the bypass valve is open. That means the CMU has been thoroughly swept and all compost is covered prior to the bypass.*

Discussion to your response to allegation 3:

All official report submittals must be submitted to GeoTracker. Submittal of a report to GeoTracker alone does not constitute Water Board approval and the February 8, 2023, email was

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not considered an approved. Official approvals are typically in the form of a signed letter. The operator has repeatedly shown an inability to keep surfaces that discharge compost impacted runoff to stormwater conveyances clean and therefore our expectation continues to be that the facility will be constructed and maintained as was approved in the technical report, including the berm and the collection of runoff from the D-table area. *Understood. The operator is continuously working towards improving the operations and compliance with the regulations.*

Please provide additional clarification to your response to allegation 7:

Please verify whether there were staff onsite at the Tajiguas Landfill or the Tajiguas Compost Management Unit to take a sample during the discharge event beginning on January 9, 2023, to when the discharge event ended. How was water discharged during this event, such as bypass through opening the manual valve or tank overflow? When did the discharge event end? Was tank water sampled?

This is best answered with a direct quote from operational staff: On January 9th, the manual bypass valve was opened at approximately 1:30 PM. No sample was taken, as Emergency Evacuation notifications for the Alisal Burn area were sent to all staff via ReadySBC. All staff left site between 1:30 PM and 2:00 PM, as freeways had already begun to be shut down. Staff were frantic getting off-site in a safe manner due to heavy rain deluge. Staff were not able to make it back to site until the morning of the 11th, due to the 101 freeway being shut down in various locations. On the morning of the 11th, flow had ceased going through the bypass line and sampling location, so the manual bypass valve was closed between 8:00 and 9:00 AM. It is unknown when discharge via the bypass line ended, as staff were not able to access the facility for over 40 hours.

The requirement to sample stormwater during a discharge event was proposed by the Discharger in the approved Water and Wastewater Management Plan. As stated in the March 17, 2023, NOV, the March 2022 Annual Report documented that sampling did not occur during the December 27-29, 2021, storm. I sent an email on April 11, 2022, documenting the violation of not taking the required sample, and noted the Compost General Order notification requirements when violations occur. On April 19, 2022, I received a response via email that a refresher training would be performed to ensure staff fully understood their responsibilities. You must explain why sampling was missed during this wet weather season and what your plan is to remedy this violation in the future. *As noted in our March 30th letter, on-site staff mistakenly believed that IGP sampling and reporting also addressed the CMU requirements. They have been informed that the compost reporting requirements must be met irrespective of any overlapping IGP requirements.*

Report submittals must be submitted within the required timeframe with reference and documentation of pending lab results, and indication of when those results would be submitted. *Noted.*

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Please provide additional information to your response to allegation 8:

The Facility is permitted to accept anaerobic digestate and green material. Per the Compost General Order, anaerobic digestate must be derived from Tier 2 allowable feedstocks, including food materials. Per CCR, title 14, section 17852, physical contaminants including glass, metals, and plastics within food materials and green materials, must contain no greater than 1 percent physical contaminants by dry weight. This refers to feedstock, and therefore, the final product screening procedures outlined in the technical report are irrelevant. Physical contaminants in feedstock exceeding these requirements, does not meet the Compost General Order feedstock requirements. Please clarify what procedures will be established to ensure that feedstock entering the compost Facility does not exceed 1 percent physical contamination by weight and how that will be verified.

From Section 17852:(19) "Feedstock" means any compostable material used in the production of compost or chipped and ground material including, but not limited to, agricultural material, green material, vegetative food material, food material, biosolids, digestate, and mixed material. Feedstocks shall not be considered as either additives or amendments.

21) "Green Material" means any plant material except food material and vegetative food material that is separated at the point of generation, contains no greater than 1.0 of percent physical contaminants by dry weight, and meets the requirements of section 17868.5. Green material includes, but is not limited to, tree and yard trimmings, untreated wood wastes, natural fiber products, wood waste from silviculture and manufacturing, and construction and demolition wood waste. Green material does not include food material, vegetative food material, biosolids, mixed material, material separated from commingled solid waste collection or processing, wood containing lead-based paint or wood preservative, or mixed construction and demolition debris. Agricultural material, as defined in this section 17852(a)(5), that meets this definition of "green material" may be handled as either agricultural material or green material.

(24.5) "Land Application" means:

(A) The final deposition of compostable material and/or digestate spread on any land, including land zoned only for agricultural uses, under the following conditions:

- 1. On and after January 1, 2018, the compostable material and/or digestate does not contain more than 0.5% by dry weight of physical contaminants greater than 4 millimeters (no more than 20% by dry weight of this 0.5% shall be film plastic greater than 4 millimeters), as specified in section 17868.3.1, at the time of land application;*
- 2. The compostable material and/or digestate meets the maximum metal concentrations, as specified in section 17868.2, at the time of land application;*
- 3. The compostable material and/or digestate meets the pathogen density limits, as specified in section 17868.3(b)(1), at the time of land application; and*

The impurities that you refer to are "mixed material" under 17852 (19). The restrictions pertaining to 17852 (21) apply only to Green Material. The inert impurities do not emanate from the Green Material, they come from the digestate which is composed of food waste and mixed material.

As discussed previously, these impurities are screened out and are landfilled so that the final compost product meets the requirements of 17852 (25).

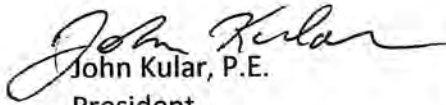
March 13, 2023, inspection report clarification:

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I realized that within the March 13, 2023, inspection report, I incorrectly referenced the stormwater/wastewater pipe, ponding on the working surface, and two inlet pipes as being at the east of the facility, when the report should have noted that these areas are located in the northern portion of the facility. I just wanted to make sure that this was clarified in case there was any confusion. *Understood.*

We trust that this explanation and plan of action will satisfy the Board's concerns. If not, we recommend that a meeting be held to discuss any unresolved issues. Please contact the undersigned at johnkularpe@gmail.com or 661-302-1292 if you require any further information. Thank you for your consideration.

Sincerely,


John Kular, P.E.
President
John Kular Consulting



3/30/23



Scott D. McGolpin
Public Works Director

Jeanette Gonzales-Knight
Deputy Director, Interim

June 21, 2023

John Dewey, CEO & Managing Member
MSB Investors, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Email: john@deweygroup.com

[US mail and emailed]

SUBJECT: Notice of Curable Breach to Agreement for the Tajiguas Resource Recovery Project and Ongoing Liquidated Damages

Mr. John Dewey,

This letter serves as a formal notification of a curable breach event by MSB Investors, LLC (MSB) for failure to comply with the Agreement between MSB and the County of Santa Barbara (County) for the Development and Operation of the Tajiguas Resource Recovery Project (Project), also referred to as the ReSource Center, in accordance with Sections 14.2.B.9, 10, and 11 of the Agreement.

On June 20, 2023, the County received a letter from the Central Coast Regional Water Quality Control Board (CCRWQCB) Enforcement Program regarding MSB's continued non-compliance with state and federal laws, including among the 8 listed violations unauthorized discharges of wastewater from the Composting Management Unit (CMU). A copy of the June 20, 2023 letter is included in Attachment A. Unlike the previous Notice of Violation (NOV) issued by the CCRWQCB on March 17, 2023, which only listed MSB as a discharger/responsible party, the June 20, 2023 NOV also lists the County as a discharger/responsible party that is liable for CMU violations due to the County's ownership of the ReSource Center. Despite numerous communications and reminders from County staff in bi-weekly Commissioning and Operations meetings with MSB, the County has not received any indication that MSB has taken the required actions to rectify the situation in a timely manner. Failure to do so constitutes a material breach of the Agreement and places the ReSource Center's ability to operate the CMU at significant risk.

MSB must immediately resolve all violations and perform all corrective actions required by the CCRWQCB (per page 5 of Attachment A), including submitting the outstanding incident reports (per page 4 of Attachment A) and missing information for the May 2023 monitoring and maintenance reports to the CCRWQCB as defined in the June 20, 2023 letter (per page 5 of Attachment A). In accordance with Section 14.2 of the Agreement, cure of this breach of the Agreement must commence within 2 days (i.e. June 23, 2023) and be complete within 15 days (i.e. July 6, 2023). In addition, MSB must complete the site improvements agreed upon in the meeting with the CCRWQCB and County on April 19, 2023, as defined in an email dated April 20, 2023 (Attachment B), by July 6, 2023. If MSB fails to cure the aforementioned events within the permitted time, in accordance with Section 14.4. of the Agreement, the County is entitled to unilaterally terminate this Agreement or impose other such sanctions.



John Dewey, CEO & Managing Member
MSB Investors, LLC
June 21, 2023
Page 2 of 2

We sincerely hope that it does not come to this and that MSB can resolve these corrective actions swiftly.

Please note, that the NOV from the CCRWQCB is a basis for the ongoing assessment of liquidated damages in accordance with Section 14.9 and Exhibit D of the Agreement. As the June 20, 2023 letter from the CCRWQCB states that these violations have not been remedied, the County will continue to assess liquidated damages for these violations in accordance with the prior Notice of Intention. As of June 21, 2023, a total of \$170,000 in liquidated damages has been assessed against MSB for failure to comply with the CCRWQCB's Compost General Order and ongoing violations noted in the CCRWQCB's June 20, 2023 letter only reinforce the daily assessments until the violations are remedied.

Sincerely,

DocuSigned by:

E31DF199C737496...

Jeanette Gonzales-Knight, PE
Interim Deputy Director

cc: Scott McGolpin, Santa Barbara County Public Works Department
Marty Wilder, Santa Barbara County Public Works Department
Carlyle Johnston, Santa Barbara County Public Works Department

Attachment A: Central Coast Regional Water Quality Control Board Enforcement Program Letter dated June 20, 2023

Attachment B: Tajiguas Composting Management Unit Action Items, Emails dated April 20, 2023

Attachment A

Central Coast Regional Water Quality Control Board
Enforcement Program Letter dated June 20, 2023



Central Coast Regional Water Quality Control Board

June 20, 2023

SENT VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7019-1640-0000-7909-3224

John Dewey
Chief Executive Officer
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza Drive, Suite 200
Newport Beach, CA 92660
john@deweygroup.com

Certified Mail No. 7019-1640-0000-7909-3251

Scott McGolpin
Public Works Director
County of Santa Barbara Public Works
123 East Anapamu Street
Santa Barbara, CA 93101
mcolpin@countyofsb.org

Dear John Dewey and Scott McGolpin,

ENFORCEMENT PROGRAM: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY – NOTICE OF VIOLATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify Mustang Renewable Power Ventures, LLC and the County of Santa Barbara (Collectively referred to as Dischargers) of alleged violations of state law at its Tajiguas Compost Management Unit (Facility) located at 14470 Calle Real in Goleta, and to explain the potential civil administrative liability for non-compliance with state and federal laws, including unauthorized discharges of waste to waters of the state and waters of the United States. Unlike the previous March 17, 2023, NOV, which listed just Mustang Renewable Power Ventures, LLC as a discharger/responsible party, this NOV also lists the County of Santa Barbara as a discharger/responsible party that is liable for Facility violations due to the County of Santa Barbara, Department of Public Works ownership of the Facility, per the [Notice of Intent](#) (NOI).

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

Background

The Dischargers are enrolled in General Waste Discharge Requirements for Commercial Composting Operations Order 2020-0012-DWQ ([Compost General Order](#)). The Facility is also a postclosure land use at the Tajiguas Landfill, which is owned and operated by the County of Santa Barbara (County).

On March 17, 2023, the Central Coast Water Board issued a notice of violation ([March 17, 2023, NOV](#)) to Mustang Renewable Power Ventures, LLC because of violations of the Compost General Order.

On May 8, 2023, the Central Coast Water Board issued an updated monitoring and reporting program ([MRP](#)) requiring the Dischargers conduct more frequent Facility inspections to inform immediate Facility repairs and corrective actions, provide additional details about Compost General Order compliance, provide Central Coast Water Board staff with more frequent and detailed Facility information about potential Compost General Order violations, and provide Facility specific requirements that more appropriately align with the site-specific operations.

On June 13, 2023, the Central Coast Water Board performed an inspection of the Facility. The [June 13, 2023, Inspection Report](#) noted that the violations outlined in the March 13, 2023, NOV had not been corrected. The continued Compost General Order violations include the following:

1. Water and wastewater have not been managed in accordance with the operational procedures within the approved Water and Wastewater Management Plan, which is required by Compost General Order Specification 6.
2. The unauthorized discharge of wastewater to surface water (Pila Creek), which violates Compost General Order Prohibition 6. During the June 13, 2023, inspection wastewater was seen leaving the Facility and entering two landfill stormwater drains that connect to landfill sediment basins. According to County staff, the basins discharged to Pila Creek on April 4.
3. The discharge of feedstock and compost outside of designated areas, including below the conveyor connecting the ADF to the CMU and the D-table area which still does not have a berm surrounding the working surface as was indicated within the Facility's technical report, which is a violation of Compost General Order Prohibition 1 and Specification 4.
4. Facility berms continue to be damaged, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 10 and Maintenance Requirement 1.
5. The Facility conveyance system pipes continue to be damaged and leak wastewater to areas outside of the Facility, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 11.

6. The Dischargers have not implemented sufficient corrective actions to address previous noncompliance, which violates General Order Additional Requirement 2.
7. The Dischargers have not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of the continued wastewater discharges from the Facility, which violates Compost General Order Monitoring and Reporting section B.3. and Compost General Order Notification Requirement 4.
8. Use of unapproved feedstocks due to the inclusion of significant physical contaminants, including plastics and glass, which is prohibited by Compost General Order Prohibition 3 and 4 and Specification 7.

Following the June 13, 2023, inspection, the Dischargers submitted an updated Water and Wastewater Management Plan, which is still under review and has not been approved.

Alleged Violations

As indicated in the [March 17, 2023, NOV](#), the drainage conveyance pipes were leaking wastewater outside of the Facility. The [March 20, 2023, response to the March 17, 2023, Notice of Violation](#) submitted on behalf of the Dischargers, indicated that the drainage conveyance pipes would be fixed after the rainy season. Per the Compost General Order, the "wet season" is defined as October 1 to April 30. As was noted in the [June 13, 2023, inspection report](#), the pipes have not been repaired and the pipes continue to discharge wastewater from the Facility, even after the end of the wet season.

MRP B.3. and B.4. require that the Dischargers notify the Central Coast Water Board within 48 hours of knowledge of Compost General Order violations or within 24 hours of becoming aware of noncompliance that endangers human health or the environment. As required by MRP B.4. the Dischargers must submit a report within 10 working days of an incident such as a wastewater discharge. No such report has been submitted for the discharge noted during the June 13, 2023, inspection. Per MRP B.4. the incident report is required to include the following information:

- a. The approximate date, time, and location of the noncompliance including a description of the ultimate destination of any unauthorized discharge and the flow path of such discharge to a receiving water body;
- b. A description of the noncompliance and its cause;
- c. Include photographs of the working surface, compost piles, pipe inlets, and other documentation documenting site conditions during the discharge event;
- d. The available tank capacity (gallons) during each of the three days prior to each diversion event;

- e. The flow rate, volume, and duration of any discharge involved in the noncompliance, and how that volume was determined (i.e., flow meter, sensor);
- f. The amount of precipitation (in inches) the day of any discharge and for each of the seven days preceding the discharge;
- g. A description (location, date and time collected, field measurements of pH, temperature, dissolved oxygen and electrical conductivity, sample identification, date submitted to laboratory, and analyses requested, including sampling for the constituents listed in **Error! Not a valid bookmark self-reference.**) of noncompliance discharge samples and/or surface water samples taken;
- h. The period of noncompliance, including dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue;
- i. A time schedule and a plan to implement corrective actions necessary to prevent the recurrence of such noncompliance; and
- j. The laboratory analyses of the noncompliance discharge sample and/or upstream and downstream surface water samples shall be submitted to the Regional Water Board office within **45 days** of the discharge.

During the June 13, 2023, inspection, Central Coast Water Board staff informed the Dischargers that a wastewater sample must be taken of the wastewater discharging from the Facility, that they must estimate the volume of discharge, and must immediately stop wastewater from discharging. On June 15, 2023, Rincon Consultants, Inc., on behalf of the Dischargers, verified via email that the Dischargers collected a wastewater sample from the leaking Facility runoff collection pipes on June 14, 2023. The Facility continues to be in violation of MRP B.4. until a complete incident report is submitted and the discharge ceases. The Dischargers must also correct impacts from the discharge, such as the removal of impacted soil and wastewater that flowed offsite.

Compost General Order Monitoring Requirements 1 and 2 require that Dischargers comply with the requirements within the site specific MRP. MRP B.1. requires the submittal of monthly monitoring and maintenance reports by the 15th of each month. On June 14, 2023, Rincon Consultants, Inc. submitted the [May 2023 Monthly Monitoring and Maintenance Report](#) for the Tajiguas Compost Management Unit. The report was found to be insufficient at meeting the MRP requirements including the following:

1. The report was not properly signed and did not include the proper statement of certification in accordance with Compost General Order Report Requirement 5.
2. The report did not provide a transmittal letter explaining the essential points including identifying violations as well as actions taken or planned to correct violations, as required by MRP B.1.a.

3. The report did not include a map showing location of observation stations or monitoring points as required by MRP B.1.b.
4. The report did not include all information in MRP section A.1.a. as required to be reported per MRP B.1.c. including a map showing where ponding on the working surface was observed, estimated size of affected area and flow rate of wastewater leaving the facility, a map of where wastewater had affected areas outside of the facility, and photographs of observed and corrected deficiencies.
5. The report did not include all information in MRP section A.1.b. as required to be reported per MRP B.1.d. including not reporting the available capacity within storage systems and capacity contained, estimated in gallons.
6. The report did not discuss the status of Compost General Order compliance and the status of correcting violations, as required by B.1.j.
7. The report did not include information for the percent of physical contaminants (e.g., glass, metal, plastic) by dry weight of received feedstock at the compost facility within the reporting month or what the primary physical contaminants were, as required by MRP B.1.k.

Immediate corrective actions must be taken to address the new and ongoing violations listed above and actions must be taken to ensure that future operations meet the conditions of the Compost General Order and associated MRP, as well as the approved Water and Wastewater Management Plan.

Potential Administrative Civil Liability

The Dischargers are hereby on notice that California Water Code (Water Code) section 13350 provides that any person who intentionally or negligently violates any conditions issued or amended by the Regional Water Board or State Water Board, is subject to administrative civil liability of up to \$5,000 per day of violation or \$10 per gallon of waste discharged. Alternatively, the superior court may impose civil liability for each violation of up to \$15,000 per day or \$20 per gallon of waste discharged.

The Dischargers do not have a permit to discharge pollutants to waters of the United States. Unpermitted discharges of pollutants to waters of the United States are violations of federal Clean Water Act (Clean Water Act) section 301. Clean Water Act section 301 violations are subject to liability under Water Code section 13385, which authorizes the Central Coast Water Board to impose administrative civil liability of up to \$10,000 per day of violation and \$10 per gallon discharged but not cleaned up over 1,000 gallons. Alternatively, a court may impose civil liability of up to \$25,000 for each day the violation occurs, and up to \$25 per gallon of waste discharged but not cleaned up over 1,000 gallons.

Furthermore, the Central Coast Water Board reserves the right to take any enforcement action authorized by law including, but not limited to, termination of the Compost

Tajiguas Compost Management Unit
Notice of Violation

- 6 -

June 20, 2023

General Order coverage (Compost General Order Additional Requirement 1) which may result from any noncompliance with Compost General Order requirements, and would require the Dischargers to implement a closure plan to perform site restoration as outlined in the Facility's Technical Report.

If you have any questions, please feel free to contact Jordan Haserot by phone at (805) 542-4781 or email at jordan.haserot@waterboards.ca.gov, or Ryan Lodge at (805) 549-3506.

Sincerely,

for Thea S. Tryon
Assistant Executive Officer

cc:

John Kular, johnkularpe@gmail.com

Dylan Ellis, dylan@mustangrpv.com

Caitlyn Teague, cteague@rinconconsultants.com

Marty Wilder, mwilder@countyofsb.org

Travis Spier, tspier@countyofsb.org

Jeanette Gonzales-Knight, jgonzal@countyofsb.org

Christina Wilder, cwilder@countyofsb.org

Kevin Brown, kevbrown@countyofsb.org

Norma Campos Bernal, ncamposbernal@sbcphd.org

Jacqueline Tkac, jacqueline.tkac@Waterboards.ca.gov

Angela Schroeter, angela.schroeter@waterboards.ca.gov

Ryan Lodge, ryan.lodge@waterboards.ca.gov

Jordan Haserot, jordan.haserot@waterboards.ca.gov

Thea Tryon, Thea.Tryon@waterboards.ca.gov

Tamara Anderson, Tamara.Anderson@waterboards.ca.gov

Todd Stanley, Todd.Stanley@waterboards.ca.gov

Jesse Woodard, Jesse.Woodard@Waterboards.ca.gov

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Tajiguas CMU Notice of Violation.docx

GeoTracker ID: T10000017039

CIWQS Place ID: 874811

Attachment B

Tajiguas Composting Management Unit Action Items,
Emails dated April 20, 2023

Gonzales-Knight, Jeanette

From: Brown, Kevin
Sent: Monday, April 24, 2023 11:40 AM
To: Haserot, Jordan@Waterboards; Wilder, Christina; John Dewey; John Kular; Dylan Ellis
Cc: Lodge, Ryan@Waterboards; Gonzales-Knight, Jeanette
Subject: RE: Tajiguas Compost Management Unit - Draft Revised MRP

All,

Based on my meeting notes, here is a breakdown of the “site improvements” noted in Jordan’s email.

Site Improvement/Repair Name	Current Status
Asphalt Repairs	Scheduled to start when the facility is dry. Expected to be completed by the end of May.
Windrows/Stockpile Traps	Ordered. Expected to be delivered the week of April 24 th .
Leaking Pipe (near Baker Tanks/D-Table)	Currently out for bid. Fused piping to replace the existing piping.

Let me know if this table needs any corrections, additional line items, or updates. Separate actions items regarding status updates for each of these site improvements/repairs would be helpful.

Thank you,

Kevin Brown
Senior Compliance Analyst

Santa Barbara County Public Works
Resource Recovery and Waste Management Division
130 East Victoria Street, Suite 100
Santa Barbara, CA 93101
Email: kevbrown@countyofsb.org
Office: (805) 882-3622
Cell: (858) 776-7045

From: Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>
Sent: Thursday, April 20, 2023 8:23 AM
To: Wilder, Christina <cwilder@countyofsb.org>; John Dewey <john@deweygroup.com>; John Kular <johnkularpe@gmail.com>; Dylan Ellis <Dylan@mustangrpv.com>; Brown, Kevin <kevbrown@countyofsb.org>
Cc: Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>; Gonzales-Knight, Jeanette <jgonzal@countyofsb.org>
Subject: RE: Tajiguas Compost Management Unit - Draft Revised MRP

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi All,

Thank you for meeting yesterday to discuss the draft revised MRP for the Tajiguas Compost Management Unit, as well as to discuss ongoing violations and planned site improvements. Below is a brief summary of the meeting and resulting action items.

The County provided information for two compounds that will be used at the site for odor control. As discussed, constituents in those compounds, including cobalt, molybdenum, and PEG, will be added to the MRP to reflect this change. Additionally reference to the definition of major storm event within Compost General Order Attachment A will be added to the MRP. We will also add more consistent language between sampling required during stormwater diversion events and wastewater spill/discharge release events, such as a requirement for photographs and reference to table B-1 for wastewater sampling. This change will be made to the Priority Reporting of Significant Events section of the MRP. During the meeting, it was reiterated that a discharge of wastewater is not permitted by the Compost General Order and is a permit violation when such wastewater discharge events occur. The Discharger (John D.) indicated a commitment to preventing wastewater discharge events in the future.

Action items: Within the next week, John K. said that he will provide a copy of the revised MRP with comments. He said that he will also provide a time estimate for submitting a revised and up-to-date Water and Wastewater Management Plan, including contingency plans for wastewater management.

Please also provide updates once site improvements occur at the site so that we can track progress towards permit compliance.

Thank you,

Jordan Haserot

Water Resource Control Engineer
Land Disposal Unit
Central Coast Regional Water Quality Control Board
(805) 542-4781



From: Haserot, Jordan@Waterboards
Sent: Monday, April 10, 2023 7:43 AM
To: Wilder, Christina <cwilder@countyofsb.org>; John Dewey <john@deweygroup.com>; John Kular <johnkularpe@gmail.com>; Dylan Ellis <Dylan@mustangrpv.com>; Gonzales-Knight, Jeanette <jgonzal@countyofsb.org>; Brown, Kevin <kevbrown@countyofsb.org>
Cc: Lodge, Ryan@Waterboards <ryan.lodge@waterboards.ca.gov>
Subject: RE: Tajiguas Compost Management Unit - Draft Revised MRP

Hi All,

Thank you for the responses. I will send out a meeting invite for April 19 from 2-3 PM.

Thanks,

Jordan Haserot

Water Resource Control Engineer
Land Disposal Unit
Central Coast Regional Water Quality Control Board
(805) 542-4781



From: Wilder, Christina <cwilder@countyofsb.org>

Sent: Thursday, April 6, 2023 9:58 AM

To: John Dewey <john@deweygroup.com>; John Kular <johnkularpe@gmail.com>; Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>; Dylan Ellis <Dylan@mustangrpv.com>; Gonzales-Knight, Jeanette <jgonzal@countyofsb.org>; Brown, Kevin <kevbrown@countyofsb.org>

Cc: Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>

Subject: RE: Tajiguas Compost Management Unit - Draft Revised MRP

EXTERNAL:

Hi Jordan,

I am also available April 19 from 2-5pm and April 20 from 3-5pm.

Thanks,

Christina Wilder | PE, QSD/P, QISP
Civil Engineer

Santa Barbara County Department of Public Works
Resource Recovery & Waste Management Division
14470 Calle Real
Goleta, CA 93117
Direct: (805) 696-1173 Cell: (805) 680-8127
Email: cwilder@countyofsb.org

From: John Dewey <john@deweygroup.com>

Sent: Wednesday, April 5, 2023 3:36 PM

To: John Kular <johnkularpe@gmail.com>; Haserot, Jordan@Waterboards <Jordan.Haserot@waterboards.ca.gov>; Dylan Ellis <Dylan@mustangrpv.com>; Gonzales-Knight, Jeanette <jgonzal@countyofsb.org>; Wilder, Christina <cwilder@countyofsb.org>; Brown, Kevin <kevbrown@countyofsb.org>

Cc: Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>

Subject: RE: Tajiguas Compost Management Unit - Draft Revised MRP

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Jordan,

Dylan and I are available on the 19th from 2-5 pm and on the 20th from 3-5 pm.

Thanks

John Dewey

From: John Kular <johnkularpe@gmail.com>

Sent: Wednesday, April 5, 2023 2:26 PM

To: Haserot, Jordan@Waterboards <Jordan.Haserot@waterboards.ca.gov>; John Dewey <john@deweygroup.com>; Dylan Ellis <Dylan@mustangrpv.com>; Gonzales-Knight, Jeanette <jgonzal@countyofsb.org>; Wilder, Christina <cwilder@countyofsb.org>; Brown, Kevin <kevbrown@countyofsb.org>

Cc: Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>

Subject: RE: Tajiguas Compost Management Unit - Draft Revised MRP

I am not available on April 17 or 18.

On the 19th I am available between 2 and 5 pm.

On the 20th I am available between 1:30 and 5 pm.

Regards,

John Kular, P.E.

John Kular Consulting

890 Lindamere Ct.

Simi Valley, CA 93065

johnkularpe@gmail.com

661-302-1292

From: [Haserot, Jordan@Waterboards](mailto:Jordan@Waterboards)

Sent: Wednesday, April 5, 2023 1:59 PM

To: [John Dewey](mailto:John.Dewey); [John Kular PE](mailto:John.Kular.PE); [Dylan Ellis](mailto:Dylan.Ellis); [Gonzales-Knight, Jeanette](mailto:Jeanette.Gonzales-Knight); [Wilder, Christina](mailto:Christina.Wilder); [Brown, Kevin](mailto:Kevin.Brown)

Cc: [Lodge, Ryan@Waterboards](mailto:Ryan@Waterboards)

Subject: Tajiguas Compost Management Unit - Draft Revised MRP

Hi All,

The Compost General Order allows the Executive Officer from Regional Water Boards to issue site specific individual monitoring and reporting programs (MRPs), when needed. Due to the recent violations documented at the Tajiguas Compost Management Unit, we have put together a site-specific MRP for the facility. Prior to finalizing the MRP, we would like to provide an opportunity for you to review a draft copy of the revised MRP (attached), so that we can discuss any questions before the document is finalized. The biggest changes to the MRP include changes to the required inspection documentation, a requirement for more frequent monitoring reports (from annual to monthly), and new stormwater diversion and tank sampling requirements.

This is also a great opportunity to have a virtual meeting to get our teams together to discuss the violations at the facility, discuss corrective actions for future compliance, and discuss any questions related to the draft revised MRP. **Please respond with your availability for April 17-20** and I will send out an hour-long meeting request for the date/time that works best for everyone.

Looking forward to further conversations.

Regards,

Jordan Haserot

Water Resource Control Engineer

Land Disposal Unit

Central Coast Regional Water Quality Control Board

(805) 542-4781





Scott D. McGolpin
Public Works Director

Jeanette Gonzales-Knight
Deputy Director, Interim

September 13, 2023

John Dewey, CEO & Managing Member
MSB Investors, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Email: john@deweygroup.com

[US mail and emailed]

SUBJECT: Response to MSB's Curable Breach and Ongoing Liquidated Damages based on the Water Board Notice of Violations at the Tajiguas Resource Recovery Project

Mr. John Dewey,

I am writing to follow up on the matter of the California Regional Water Quality Control Board (CCRWQCB) alleged violations for Waste Discharge Requirements (WDR) for Commercial Composting Operations (Order WQ 2020-0012-DWQ) and the corrective actions as previously outlined in letters from the County of Santa Barbara (County) dated April 25, 2023 and June 21, 2023, which included a compliance deadline of July 6, 2023. I would like to acknowledge our ReSource Center Compliance Plan meeting on April 28, 2023 and telephone conversation on July 12, 2023, during which we discussed the corrective actions MSB Investors, LLC (MSB) completed, repairs that are outstanding, and MSB's request to not assess liquidated damages which would be further evaluated by the County. On July 15, 2023, Rincon Consultants (Rincon) on behalf of MSB submitted a response to the CCRWQCB's alleged violations and provided photo documentation of the corrective action items completed (Attachment A). Following Rincon's submittal, the County performed an inspection of the Composting Management Unit (CMU) on July 18, 2023 and participated in meetings with MSB and its consultants, and the CCRWQCB on July 20, 2023 to discuss the outstanding corrective actions, the revised Water and Wastewater Management Plan (WWMP), and monthly monitoring and maintenance report.

As of September 13, 2023, five permit violations remain outstanding, which is a matter of concern and an ongoing breach of our agreement. These unresolved alleged violations are as follows:

Alleged Violation #1: *Water and wastewater have not been managed in accordance with the operational procedures within the approved Water and Wastewater Management Plan which is required by Compost General Order Specification 6.*

As discussed in the meeting on July 20, 2023, the CCRWQCB considers the 2021 WWMP to still be in effect as MSB works on operational efficiencies to handle and manage CMU runoff, train MSB staff to improve operational procedures and housekeeping, and propose revisions to the WWMP. During follow up inspections on June 13, 2023 by the CCRWQCB and on July 18, 2023 by the County, it was noted that MSB had not swept the CMU deck consistently, nor obtained sufficient storage capacity for the 25-year, 24-inch storm event as required by the CMU WDR and WWMP. MSB has committed to restoring capacity in the CMU Runoff Collection Tank prior to October 1, 2023. It is MSB's responsibility to sweep the CMU facility pursuant to the WWMP while working with the County to evaluate



John Dewey, CEO & Managing Member
MSB Investors, LLC
September 13, 2023
Page 2 of 6

more effective sweepers for either rental or purchase. In accordance with the County's previous determination and as supported by the additional explanation of the ongoing violation addressed above, liquidated damages of \$500 per day until remedied amount to \$70,000 as of September 13, 2023 and will continue to be assessed until resolved.

Alleged Violation #2: *The unauthorized discharge of wastewater to surface water (Pila Creek) which violates Compost General Order Prohibition 6.*

During the June 13, 2023 inspection by the CCRWQCB, runoff was seen leaving the CMU and entering two Tajiguas Landfill stormwater drains that connect to the North Sedimentation basin. The laboratory analytical results for the CMU runoff sample collected on June 14, 2023 by MSB were submitted to the CCRWQCB on August 15, 2023, 18 days after the deadline as required by WDR monitoring and reporting requirements B.3.h within 45 days of the discharge (due July 28, 2023). Although MSB removed the runoff-impacted soil by the County's July 6, 2023 deadline, the County observed additional areas where CMU runoff subsequently entered the drainage system and leaked onto the landfill's intermediate cover, outside of the CMU facility limits. On July 18, 2023, MSB temporarily plugged two inlet drains on the CMU deck to prevent CMU runoff entry into the drainage system pipes, which MSB reports will be replaced by MSB's contractor prior to October 1, 2023. On July 18, 2023, County staff witnessed MSB removing additional runoff-impacted soil from the intermediate cover to prevent the CMU runoff from entering into the nearby landfill's stormwater drain. On a phone call that afternoon, we discussed that MSB will continue to conduct daily inspections of the CMU facility to remediate any future leaks of runoff and prevent them from entering the landfill's stormwater drains. In accordance with the County's previous determination and as supported by the additional explanation of the ongoing violation addressed above, liquidated damages of \$500 per day until remedied amount to \$70,000 as of September 13, 2023 and will continue to be assessed until resolved.

Alleged Violation #3: *The discharge of feedstock and compost outside of designated areas, including below the conveyor connecting the ADF to the CMU, and the D-table area which still does not have a berm surrounding the working surface as was indicated within the Facility's technical report, which is a violation of Compost General Order Prohibition 1 and Specification 4.*

MSB committed to installing a scraper onto the underside of the conveyor (return side) to prevent digestate from dropping and accumulating outside of the permitted composting operation area. As of September 13, 2023, a scraper has not been installed and the D-table area does not have a berm surrounding the working surface as was indicated within the CMU technical report (dated April 6, 2021). In accordance with the County's previous determination and as supported by the additional explanation of the ongoing violation addressed above, liquidated damages of \$500 per day until remedied amount to \$70,000 as of September 13, 2023 and will continue to be assessed until resolved.

John Dewey, CEO & Managing Member
MSB Investors, LLC
September 13, 2023
Page 3 of 6

Alleged Violation #5: *The Facility conveyance system pipes continue to be damaged and leak wastewater to areas outside of the Facility, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 11.*

On July 18, 2023, County staff noted runoff from the CMU deck had entered into the drainage system piping and was leaking onto the landfill's intermediate cover, even after MSB had previously attempted to block off the inlets. MSB's schedule for replacement of the entire drainage system piping was originally estimated for completion by the end of May but was revised to October 1, 2023, however until replaced this continues to be a violation of the general compost order. In accordance with the County's previous determination and as supported by the additional explanation of the ongoing violation addressed above, liquidated damages of \$500 per day until remedied amount to \$70,000 as of September 13, 2023 and will continue to be assessed until resolved.

Alleged Violation #6: *The Dischargers have not implemented sufficient corrective actions to address previous noncompliance, which violates General Order Additional Requirement 2.*

As shown in MSB's photo documentation submitted to the CCRWQCB on July 15, 2023 (Attachment A) and observed during the County's inspection on July 18, 2023, MSB has remedied several corrective actions that were noted in the CCRWQCB's June 13, 2023 inspection. MSB confirmed in an operations meeting on August 9, 2023 that repairs to the fence on the CMU deck were underway. The County also acknowledges that John Kular and Rincon on behalf of MSB submitted a revised WWMP to the CCRWQCB on June 13, 2023 and a follow up WWMP on August 17, 2023, however not all corrective actions have been completed and there are additional actions required by MSB to comply with the General Order as addressed in the CCRWQCB's Notice of Violation and inspection (Attachments B and C). Please continue to keep the County updated on the status of these outstanding items and provide an expected date for completion. In accordance with the County's previous determination and as supported by the additional explanation of the ongoing violation addressed above, liquidated damages of \$500 per day until remedied amount to \$70,000 as of September 13, 2023 and will continue to be assessed until resolved.

Alleged Violation #7: *The Dischargers have not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of the continued wastewater discharges from the Facility, which violates Compost General Order Monitoring and Reporting section B.3. and Compost General Order Notification Requirement 4.*

John Dewey, CEO & Managing Member
MSB Investors, LLC
September 13, 2023
Page 4 of 6

As previously mentioned, the laboratory analytical results for the runoff sample collected on June 14, 2023 by MSB were submitted to the CCRWQCB on August 15, 2023, 18 days after the deadline as required by WDR monitoring and reporting requirements B.3.h within 45 days of the discharge (due July 28, 2023). In addition, incident reports for discharge events that occurred earlier in 2023 are still outstanding. The County acknowledges that the laboratory analytical reports for discharge events that occurred on March 10, 14, 22, and 30 were uploaded to GeoTracker, however, details required by WDR monitoring and reporting requirements B.3 were not included and must be remedied by MSB. In accordance with the County's previous determination and as supported by the additional explanation of the ongoing violation addressed above, liquidated damages of \$500 per day until remedied amount to \$70,000 as of September 13, 2023 and will continue to be assessed until resolved.

Alleged Violation #8: *The Use of unapproved feedstocks due to the inclusion of significant physical contaminants, including plastics and glass, which is prohibited by Compost General Order Prohibition 3 and 4 and Specification 7.*

The County acknowledges that MSB and Rincon have objected to the CCRWQCB's alleged violation #8 and have committed to submitting a response to address the regulatory overlap between the State Water Resources Control Board Order WQ 2020-0012-DWQ and CalRecycle's mandates for organic diversion. As noted in the email response dated August 29, 2023, the CCRWQCB "*will not approve mixed material as a Compost General Order allowable feedstock or as an additive. The Tajiguas CMU remains in violation of Compost General Order Prohibition 3 and 4 and Specification 7, and the facility must not accept material that does not meet feedstock requirements while the facility is permitted under the Compost General Order.*" Please provide the County with an expected date for Rincon's response to the CCRWQCB. To date the County has assessed MSB with \$70,000 of liquidated damages associated with this violation and will continue assessing liquidated damages until this matter is remedied or the violation is withdrawn by the CCRWQCB. MSB is required to keep the County apprised of the status of this violation.

John Dewey, CEO & Managing Member
MSB Investors, LLC
September 13, 2023
Page 5 of 6

The County is pleased to acknowledge that MSB has made good faith efforts to remediate one alleged violation following the County's June 21, 2023 letter:

Alleged Violation #4: *Facility berms continue to be damaged, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 10 and Maintenance Requirement 1.*

As shown in MSB's photo documentation submitted to the CCRWQCB on July 15, 2023 (Attachment A) and observed during the County's inspection on July 18, 2023, berms and asphalt repairs on the CMU deck were completed on June 30, 2023 and July 14, 2023. MSB also confirmed in a follow up meeting on August 9, 2023 that a slurry coat was applied to the asphalt repairs made around the CMU Baker tanks to improve the integrity of the newly installed berm. Liquidated damages of \$500 per day were assessed until the corrective action was remedied on July 14, 2023 and amount to \$39,500. Accordingly, these damages are due and payable to the County within 10 days of the date of this letter.

Please be aware that the County has taken into consideration MSB's arguments for allowing non-compliance of the WDR due to Uncontrollable Circumstances that were beyond the reasonable control of the Contractor (as defined in the Agreement, Section 1.138) and have found them to be without merit. MSB's Technical Report and WWMP outlines the operational procedures MSB should have followed under different rainfall scenarios and windrow moisture conditions at the CMU (Technical Report, Table 2 – Rainfall Event Action Plan). The WDR requires the CMU be designed, constructed, and maintained to convey all precipitation and runoff from a 25-year, 24-hour peak storm event at a minimum. The Technical Report calculated a 25-year, 24-hour rainfall depth of 6.71 inches. During the first and second quarters of 2023, the Gaviota Coast rain gauge (2581), located in an adjacent canyon, recorded a maximum 24-hour precipitation of 4.17 inches on January 8, 2023 (Attachment D); this rain event and subsequent rain events should have either been captured by the CMU Runoff Collection Tank, or contingency actions deployed according to the Technical Report. MSB also failed to notify the County and CCRWQCB within 48 hours of knowledge of WDR violations or within 24 hours of becoming aware of non-compliance that endangers the environment. Additionally, please note that John Kular's advice on the applicable WDR in your July 6, 2023 response is incorrect. The Notice of Applicability dated June 11, 2021 (Attachment E) from the CCRWQCB states that the CMU is permitted under Order no. WQO-2020-0012.

On April 25, 2023, MSB was given notice of the County's intent to assess liquidated damages and along with a description and written explanation of non-compliance based on the CCRWQCB NOV dated March 17, 2023. The County has evaluated evidence presented by MSB both in writing, over the phone, and through testimony of MSB's employees regarding progress made and delays in addressing the required corrective actions. Based on the status of the unresolved corrective actions detailed above, the County will continue assessing liquidated damages according to the prior Notice of Intention and this decision is final.

John Dewey, CEO & Managing Member
MSB Investors, LLC
September 13, 2023
Page 6 of 6

Regarding the resolved violation, we require your payment for related liquidated damages, as outlined in our Agreement, within 10 days from the date of this letter. If these liquidated damages of \$39,500 are not paid within the 10-day period, MSB will be in default of the Agreement. As to the ongoing violations addressed in this letter, as of September 13, 2023 MSB currently owes the County \$420,000. This is excluding violation number 8, as we will wait to issue an invoice for this violation until there is resolution by CCRWQCB as discussed above. While the contract requires payment of liquidated damages within 10 days after being assessed, as these damages are ongoing and based on the significant sum, MSB has 30 days from the date of this letter to pay these damages.

Swift action is urged to rectify these corrective actions and avoid further consequences. This letter does not waive any remedies available to the County as the result of MSB's failure to timely cure the breach of the contract by July 6, 2023. Based on the collaboration and communication of the parties, the County provided MSB with an additional 30 days from July 6th to August 6th to cure, and based on this letter, is providing MSB an additional 56 days to cure until October 1, 2023. However, this additional time does not stay or waive the ongoing assessment of liquidated damages, as address above, or the County right to pursue other remedies. Collaboration is crucial to addressing violations and ensuring project compliance. Your timely attention is anticipated, as well as your diligence to pursue the cure to completion, and we aim to resolve these matters promptly for the successful progression of the project.

Sincerely,

DocuSigned by:

E31DF199C737496...

Jeanette Gonzales-Knight, PE
Interim Deputy Director

cc: Scott McGolpin, Santa Barbara County Public Works Department
Marty Wilder, Santa Barbara County Public Works Department
Carlyle Johnston, Santa Barbara County Public Works Department

Attachment A: Response to Central Coast Regional Water Quality Control Board and Photo Documentation dated July 15, 2023

Attachment B: Central Coast Regional Water Quality Control Comments to Water and Wastewater Management Plan, Email dated June 29, 2023

Attachment C: Central Coast Regional Water Quality Control Comments to Water and Wastewater Management Plan, Email dated August 28, 2023

Attachment D: 2023 Rainfall at the Gaviota Coast

Attachment E: Central Coast Regional Water Quality Control Board Notice of Applicability dated June 11, 2021

Attachment A

Response to Central Coast Regional Water Quality Control Board and
Photo Documentation dated July 15, 2023

Jeanette Gonzales-Knight

From: Caitlyn Teague <cteague@rinconconsultants.com>
Sent: Saturday, July 15, 2023 2:14 PM
To: Olson, Tammie@Waterboards; john@deweygroup.com; Scott McGolpin
Cc: johnkularpe@gmail.com; dylan@mustangrpv.com; Martin Wilder; Travis Spier; Jeanette Gonzales-Knight; Christina Wilder; Kevin Brown; Campos Bernal, Norma; Tkac, Jacqueline N.@Waterboards; Schroeter, Angela@Waterboards; Lodge, Ryan@Waterboards; Haserot, Jordan@Waterboards; Tryon, Thea@Waterboards; Anderson, Tamara@Waterboards; Stanley, Todd@Waterboards; Woodard, Jesse@Waterboards; Torin Snyder; Kiernan Brtalik
Subject: RE: NOTICE OF VIOLATION: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY
Attachments: Response to June NOV_July 15 2023.pdf; Photo documentation of corrective actions July 15 2023.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Central Coast Regional Water Quality Control Board,
On behalf of Mustang Renewable Power Ventures, LLC. (Discharger), Rincon Consultants, Inc. (Rincon) has prepared the attached Response to June 20, 2023, NOV, and Photo documentation of corrective action items at the Tajiguas CMU (Facility). The attached files can also be accessed at the link below.

<https://rinconconsultants.files.com/f/b6c9f8840b557642>

The Response to June NOV table has been formatted to address each alleged violation (Items 1-12) identified in the June 20, 2023, NOV. Each item includes a description of the alleged violation, the status of corrective action, documents to rectify/develop, and a proposed schedule.

The photo documentation of corrective actions compares (before) photographs from the [June 13, 2023 inspection report](#) and (after) photographs from July 14, 2023 that document repairs made at the Facility.

We would like to request a follow up meeting with the Water Board to review progress at the Facility and demonstrate our commitment to compliance with the Compost General Order and all water quality standards. Please let us know when a follow up meeting can be scheduled and do not hesitate to reach out with any questions or requests.

Thank you,
Caitlyn

Caitlyn Teague, QSD/P, QISP, Sr. Environmental Scientist

(She/Her/Hers)

805-644-4455 Main | 805-509-8399 Mobile | 805-586-3208 Direct

cteague@rinconconsultants.com



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Environmental Scientists | Planners | Engineers

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Ranked 2021 "Best Environmental Services Firm to Work For" by Zweig Group

Time Off Alert: 07/21 – 07/24

From: Olson, Tammie@Waterboards <Tammie.Olson@Waterboards.ca.gov>
Sent: Tuesday, June 20, 2023 3:31 PM
To: john@deweygroup.com; mcgolpin@countyofsb.org

Cc: johnkularpe@gmail.com; dylan@mustangrpv.com; Caitlyn Teague <cteague@rinconconsultants.com>; mwilder@countyofsb.org; tspier@countyofsb.org; jgonzal@countyofsb.org; cwilder@countyofsb.org; kevbrown@countyofsb.org; ncamposbernal@sbcphd.org; Tkac, Jacqueline N.@Waterboards <Jacqueline.Tkac@Waterboards.ca.gov>; Schroeter, Angela@Waterboards <Angela.Schroeter@waterboards.ca.gov>; Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>; Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>; Tryon, Thea@Waterboards <Thea.Tryon@waterboards.ca.gov>; Anderson, Tamara@Waterboards <Tamara.Anderson@waterboards.ca.gov>; Stanley, Todd@Waterboards <Todd.Stanley@waterboards.ca.gov>; Woodard, Jesse@Waterboards <Jesse.Woodard@Waterboards.ca.gov>
Subject: [EXT] NOTICE OF VIOLATION: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY

CAUTION: This email originated from outside of Rincon Consultants. Be cautious before clicking on any links, or opening any attachments, until you are confident that the content is safe .

NOTICE OF VIOLATION: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY

The Central Coast Regional Water Quality Control Board is increasing its efforts to transmit correspondence and other information electronically, reducing the amount of paper used, and increasing the speed of which information is distributed. Therefore, you are receiving the attached correspondence for the subject site from the Central Coast Water Board in a Portable Data Format (PDF) and will not receive a hard copy unless requested. If you need help opening this document please refer to the link below:

<http://www.adobe.com/products/acrobat/readstep2.html>

CCRWQCB Notice of Violation to Santa Barbara County ReSource Center CMU
Mustang Response - Summary Status

Item	Document	Alleged Violation	Status of Corrective Action	Documents to Rectify/Develop	Proposed Schedule
1	Central Coast Regional Water Quality Control Board (CCRWQCB) Notice of Violation (NOV) June 20, 2023	On June 13, 2023, the Central Coast Water Board performed an inspection of the Facility. The June 13, 2023, Inspection Report noted that the violations outlined in the March 13, 2023, NOV had not been corrected. The continued Compost General Order violations include the following: 1. Water and wastewater have not been managed in accordance with the operational procedures within the approved Water and Wastewater Mangement Plan (WWMP), which is required by Compost General Order Specification 6.	In Progress. The Discharger is working on operational efficiencies to handle and manage water in accordance with the approved WWMP. Compost Management Unit (CMU) staff will be trained to improve operational procedures and housekeeping in and around the Tajiguas ReSource Center (Facility).	The revised Water and Wastewater Management Plan (WWMP) will include all relevant information related to how water and wastewater will be managed at the Facility. The basic operating philosophy has not changed. Piles will be covered when a stormwater diversion is necessary due to lack of leachate storage capacity and/or saturation of compost windrows. The Discharger will space the piles closer together so that tarpaulins fully overlap over the narrow aisles between the windrows. That will leave a very limited but wide aisle around all the windrows to be mechanically swept by a street sweeper. The outer aisle will be swept regularly irrespective of impending rainfall to prevent compost from being ground into the asphalt surface making it difficult to effectively clean. During the winter of 2022/23, the runoff capacity storage was exceeded several times due to successive heavy rainfalls and the inability of the ADF percolate system to accept wastewater due to equipment malfunctions. Despite the improved procedures described in Section 5, it is conceivable that the runoff capacity storage could be exceeded in the future and that some other cause may prevent the diversion of site runoff which has not contacted compost. In such cases, the contingency plan would be to rent additional baker tanks to be temporarily installed on the CMU deck. High capacity rented trash pumps would transfer collected wastewater from the CMU baker tanks to the rented tanks. We will augment the WWMP text to clarify this.	Corrective actions will be included in monthly monitoring and maintenance reports (monthly reports). UV Tarps have been ordered and will be on-site by July 14, 2023. Rental kick broom will be delivered to the CMU by Friday, July 7, 2023.
2	CCRWQCB NOV June 20, 2023	2. The unauthorized discharge of wastewater to surface water (Pila Creek), which violates Compost General Order Prohibition 6. During the June 13, 2023, inspection wastewater was seen leaving the Facility and entering two landfill stormwater drains that connect to landfill sediment basins. According to County staff, the basins discharged to Pila Creek on April 4.	In Progress. During the June 13, 2023, inspection, Central Coast Water Board staff informed the Dischargers that a wastewater sample must be taken of the wastewater discharging from the Facility, that they must estimate the volume of discharge, and must immediately stop wastewater from discharging. On June 15, 2023, Rincon Consultants, Inc., on behalf of the Dischargers, verified via email that the Dischargers collected a wastewater sample from the leaking Facility runoff collection pipes on June 14, 2023. Laboratory results for the June 14, 2023 are still pending as of July 5, 2023, but the discharge was stopped on June 15, 2023. Once the laboratory results are received, a complete incident report will be submitted. The Discharger has also removed impacted soil. The impacted soil removal is complete and undergoing third party verification with Santa Barbara County personnel.	Incident Report for June 13, 2023 discharge. Pending laboratory results.	Incident report will be completed by Friday, July 28, 2023 (assuming lab results will be received before then.)
3	CCRWQCB NOV June 20, 2023	3. The discharge of feedstock and compost outside of designated areas, including below the conveyor connecting the ADF to the CMU, and the D-table area which still does not have a berm surrounding the working surface as was indicated within the Facility's technical report, which is a violation of Compost General Order Prohibition 1 and Specification 4.	In Progress. By the end of July 2023, a welder is scheduled to weld a scraper onto the underside of the conveyor (return side) at the drop point in the CMU deck bunker to reduce digestate spillage on the return (underside) conveyor. Any spillage of digestate under the decompactor conveyor to the CMU will be cleaned up at least weekly. The existing BMP of spillage control in the middle of the conveyor (waddle berm and tarp) will be continued. The following repairs were completed by June 30, 2023: 1) Asphalt repairs to the two large areas in front of the CMU bunkers, 2) all CMU berm repairs, and 3) the addition of the asphalt curb/berm around the CMU Baker Tanks.	WWMP and monthly reports	Welding will be completed prior to August 1, 2023.
4	CCRWQCB NOV June 20, 2023	4. Facility berms continue to be damaged, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 10 and Maintenance Requirement 1.	Completed. Facility berms have been improved. Asphalt repairs were completed at the ReSource Center on June 30, 2023. Additional asphalt repairs were completed on July 14, 2023.	WWMP and monthly reports.	Documentation of asphalt repairs will be included in the June monthly report, which will be submitted by July 15, 2023.
5	CCRWQCB NOV June 20, 2023	5. The Facility conveyance system pipes continue to be damaged and leak wastewater to areas outside of the Facility, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 11.	In Progress. The first phase of the leak repair process was completed on Friday, June 23, 2023, when Pacific Petroleum was on site to complete the removal of all sediment in and cleaning of the two permanent baker tanks. We have also blocked off the two existing inlets so no new compost leachate or other liquid on the CMU deck will flow into the piping connecting to the two baker tanks. Any new leachate that may accumulate near the drainage inlets or low points on the CMU deck during the summer months will be collected with our vacuum truck and fed into the ADF percolate system. Additional sandbags have been deployed coupled with asphalt berm repairs will assist in the prevention of flow outside the CMU deck. The aforementioned asphalt berm surrounding the baker tanks is in place to prevent discharge to the environment. Currently, Mustang and Pacific Petroleum are investigating the integrity of the piping and tank systems. Mechanical work is ongoing to ensure system integrity. Drainage inlets will remain blocked off until the completion of the removal and replacement of the corrugated plastic pipe with fused HDPE pipe including the addition of two additional inlets required on the western end of the CMU (required due to nearly two feet of settlement that has occurred since the CMU was constructed in early 2021). The closed and open status of these inlets will be part of our monthly inspections and monitoring report. We received two bids (Raminha and Kirkland Construction) as of June 25, 2023. We have selected Kirkland and have asked them to update their bid with some additional design clarifications recently provided by our engineer, John Kular. As discussed on our teams meeting with Jordan of Santa Barbara County on April 19th, the completion of entire drainage system piping will be completed prior to October 1, 2023. Kirkland has estimated an 8-10 week schedule for pipe procurement, mobilization and installation and has reconfirmed that they can complete the project no later than October 1, 2023.	WWMP and monthly reports.	Completion of entire drainage system piping will be completed prior to October 1, 2023.
6	CCRWQCB NOV June 20, 2023	6. The Dischargers have not implemented sufficient corrective actions to address previous noncompliancecomplete violates General Order Additional Requirement 2.	Completed. A summary of corrective actions that address previous non-compliance in the June 2023 monthly report.	June 2023 monthly report.	July 15, 2023 submittal of June monthly report.
7	CCRWQCB NOV June 20, 2023	7. The Dischargers have not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of the continued wastewater discharges from the Facility, which violates Compost General Order Monitoring and Reporting section B.3. and Compost General Order Notification Requirement 4.	In Progress. In addition to monthly reports, in the future, any noncompliance will be reported, and the Water Board notified, as needed, implementing training procedures.	Monthly reports.	July 15, 2023 submittal of June monthly report.

CCRWQCB Notice of Violation to Santa Barbara County ReSource Center CMU
Mustang Response - Summary Status

Item	Document	Alleged Violation	Status of Corrective Action	Documents to Rectify/Develop	Proposed Schedule
8	CCRWQCB NOV June 20, 2023	8. Use of unapproved feedstocks due to the inclusion of significant physical contaminants, including plastics and glass, which is prohibited by Compost General Order Prohibition 3 and 4 and Specification 7.	Objection. The inert, inorganic materials are screened out of the digestate and the compost in several steps using screens with decreasing aperture sizes. Finally, the glass and stones are removed by the desimetric table (D-table). The solid inerts provide a benefit to the composting process by enhancing air flow through the compost windrows. These substances are present during the composting process, but they are not feedstock by definition as they do not form part of the finished compost. The inerts are removed from the finished compost in accordance with the US Compost Council standards. The presence of all of these materials as well as the composting and screening process were all thoroughly described in Section 7.d of the approved CMU Technical report. In summary, there is a regulatory language overlap between SWRCB with its compost management aims and the mandates of Cal Recycle for organic diversion. The premise and design details of ReSource Center's digestate & finished compost management and ADF was noticed properly by Santa Barbara County Planning to RWQCB during environmental review and no comments were submitted by SWRCB or RWQCB on the digestate management and feedstock control.	WWMP and monthly reports.	Compost reports will be included with the revised May 2023 monthly report and future monthly reports.
9	CCRWQCB NOV June 20, 2023	As indicated in the March 17, 2023, NOV, the drainage conveyance pipes were leaking wastewater outside of the Facility. The March 20, 2023, response to the March 17, 2023, Notice of Violation submitted on behalf of the Dischargers, indicated that the drainage conveyance pipes would be fixed after the rainy season. Per the Compost General Order, the "wet season" is defined as October 1 to April 30. As was noted in the June 13, 2023, inspection report, the pipes have not been repaired and the pipes continue to discharge wastewater from the Facility, even after the end of the wet season.	In Progress. Please see Status of Corrective Action on Item 5.	WWMP and monthly reports.	Completion of entire drainage system piping will be completed prior to October 1, 2023.
10	CCRWQCB NOV June 20, 2023	MRP B.3. and B.4. require that the Dischargers notify the Central Coast Water Board within 48 hours of knowledge of Compost General Order violations or within 24 hours of becoming aware of noncompliance that endangers human health or the environment. As required by MRP B.4. the Dischargers must submit a report within 10 working days of an incident such as a wastewater discharge. No such report has been submitted for the discharge noted during the June 13, 2023, inspection.	In Progress. Laboratory results for the June 14, 2023 are still pending as of July 14, 2023, but the discharge was stopped on June 15, 2023. Once the laboratory results are received, a complete incident report will be submitted. The Discharger has also removed impacted soil. The impacted soil removal is complete and undergoing third party verification with the Santa Barbara County personnel.	Incident Report for June 13, 2023 discharge. Pending lab results.	Incident report will be completed by Friday, July 28, 2023 (assuming lab results will be received before then.)
11	CCRWQCB NOV June 20, 2023	During the June 13, 2023, inspection, Central Coast Water Board staff informed the Dischargers that a wastewater sample must be taken of the wastewater discharging from the Facility, that they must estimate the volume of discharge, and must immediately stop wastewater from discharging. On June 15, 2023, Rincon Consultants, Inc., on behalf of the Dischargers, verified via email that the Dischargers collected a wastewater sample from the leaking Facility runoff collection pipes on June 14, 2023. The Facility continues to be in violation of MRP B.4. until a complete incident report is submitted and the discharge ceases. The Dischargers must also correct impacts from the discharge, such as the removal of impacted soil and wastewater that flowed offsite.	In Progress. Please see Status of Corrective Action on Item 2. The Discharger has also removed impacted soil along the discharge flow path to the stormwater inlets and put into a Pacific Petroleum roll-off bin. It is around 10 yards of material. We do not know where it will be disposed of yet, as we will need to get landfill specific lab analysis completed. We plan to back fill with road base.	Incident Report for June 13, 2023 discharge. Pending laboratory results.	Incident report will be completed by Friday, July 28, 2023 (assuming lab results will be received before then.)
12	CCRWQCB NOV June 20, 2023	Compost General Order Monitoring Requirements 1 and 2 require that Dischargers comply with the requirements within the site specific MRP. MRP B.1. requires the submittal of monthly monitoring and maintenance reports by the 15th of each month. On June 14, 2023, Rincon Consultants, Inc. submitted the May 2023 Monthly Monitoring and Maintenance Report for the Tajiguas Compost Management Unit. The report was found to be insufficient at meeting the MRP requirements*	Completed. The May 2023 Monthly Monitoring and Maintenance Report will be revised and resubmitted in compliance with the MRP requirements. Monthly reports, thereafter will also be in compliance.	May 2023 Monthly Monitoring and Maintenance Report.	May and June 2023 monthly reports will be submitted to GeoTracker prior to July 15, 2023.
*MRP Requirements (Row 13, Item 12)					
1. The report was not properly signed and did not include the proper statement of certification in accordance with Compost General Order Report Requirement 5.					
2. The report did not provide a transmittal letter explaining the essential points including identifying violations as well as actions taken or planned to correct violations, as required by MRP B.1.a.					
3. The report did not include a map showing location of observation stations or monitoring points as required by MRP B.1.b.					
4. The report did not include all information in MRP section A.1.a. as required to be reported per MRP B.1.c. including a map showing where ponding on the working surface was observed, estimated size of affected area and flow rate of wastewater leaving the facility, a map of where wastewater had affected areas outside of the facility, and photographs of observed and corrected deficiencies.					
5. The report did not include all information in MRP section A.1.b. as required to be reported per MRP B.1.d. including not reporting the available capacity within storage systems and capacity contained, estimated in gallons.					
6. The report did not discuss the status of Compost General Order compliance and the status of correcting violations, as required by B.1.j.					
7. The report did not include information for the percent of physical contaminants (e.g., glass, metal, plastic) by dry weight of received feedstock at the compost facility within the reporting month or what the primary physical contaminates were, as required by MRP B.1.k.					

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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 1A. June 13, 2023. Conveyor system that moves compost feedstock (digestate) from the ADF to the CMU continues to have feedstock material beneath the conveyor from fallen material.



Photograph 1B. July 14, 2023. Scraper pending installation on conveyor belt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 2A. June 13, 2023. Compost on D-table working surface. No berm around this area of the CMU, as was included in the approved technical report for the site.



Photograph 2B. July 14, 2023. Asphalt berm has been installed to the west side of the baker tanks.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 3A. June 13, 2023. Orange gloves littered the entrance area of the facility.



Photograph 3B. July 14, 2023. Orange gloves have been removed. Staff will continue to be trained to improve housekeeping procedures.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 4A. June 13, 2023. Pondered wastewater near the north area of the working surface and at the stormwater/wastewater outlet to the stormwater/ wastewater conveyance pipes.



Photograph 4B. July 14, 2023. Pondered water was not observed. The storm drain inlet has been blocked off to prevent leachate from entering the broken conveyance system (pending repair).



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 5A. June 13, 2023. Compost windrows and wastewater.



Photograph 5B. July 14, 2023. Compost windrows, facing south.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 6A. June 13, 2023. Pondered wastewater at the northern portion of the working surface.



Photograph 6B. July 14, 2023. View of working surface, facing west. The berm has been repaired with asphalt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 7A. June 13, 2023. Compost windrows with wastewater next to the windrows.



Photograph 7B. July 14, 2023. Compost windrows. Minimal leachate observed.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 8A. June 13, 2023. Pondered wastewater at the northern portion of the working surface.



Photograph 8B. July 14, 2023. Pondered water was observed at the northern portion of the working surface. Storm drain inlets have been blocked to prevent discharge to the conveyance system.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 9A. June 13, 2023. Pondered wastewater at the northern portion of the working surface with a scraper pushing compost/material into the ponded area after scraper dragged its blade around the perimeter of the working surface.



Photograph 9B. July 14, 2023. Pondered water was not observed at the northern portion of the working surface. Storm drain inlets have been blocked to prevent discharge to the conveyance system.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 10A. June 13, 2023. Water truck spraying compost windrows.



Photograph 10B. July 14, 2023. CMU deck has been allowed to dry.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 11A. June 13, 2023. Damaged area of the working surface with ponded water and scraped asphalt surface.



Photograph 11B. July 14, 2023. Damaged areas of the working surface have been repaired with asphalt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 12A. June 13, 2023. Pondered wastewater at the northern portion of the facility.



Photograph 12B. July 14, 2023. Pondered water was not observed at the northern portion of the facility. Storm drain inlets have been blocked to prevent discharge to the conveyance system.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 13A. June 13, 2023. Wastewater near stored screens with littered compost, trash, and other material.



Photograph 13B. July 14, 2023. No water observed.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 14A. June 13, 2023. Piled tarps, not properly stored.



Photograph 14B. July 14, 2023. Tarp storage area. Tarps will be replaced with Gore material later this year.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 15A. June 13, 2023. Tanks of percolate from the ADF stored at the CMU.



Photograph 15B. July 14, 2023. Tanks of percolate from the ADF stored at the CMU.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 16A. June 13, 2023. Water truck spraying compost piles.



Photograph 16B. July 14, 2023. Compost piles facing north.

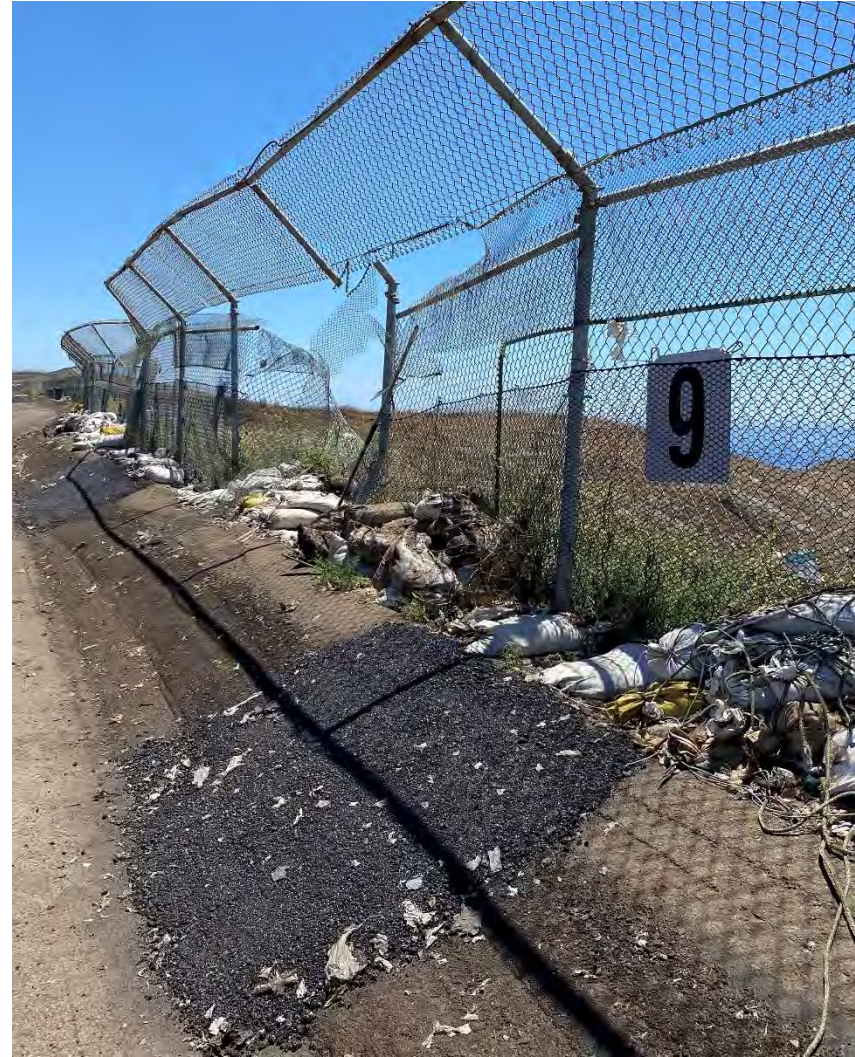


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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 17A. June 13, 2023. Damaged working surface, berms, and litter fence.



Photograph 17B. July 14, 2023. Berm has been repaired with asphalt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 18A. June 13, 2023. Damaged litter fence.



Photograph 18B. July 14, 2023. The fence is scheduled to be repaired.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 19A. June 13, 2023. Damaged facility berm.



Photograph 19B. July 14, 2023. The facility berm has been repaired with asphalt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 20A. June 13, 2023. Damaged facility berm.



Photograph 20B. July 14, 2023. The facility berm has been repaired with asphalt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 21A. June 13, 2023. Significant physical contaminants within windrows.



Photograph 21B. July 14, 2023. Compost windrows, facing south.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 22A. June 13, 2023. Damaged working surface where feedstock/digestate enters the facility from the ADF.



Photograph 22B. July 14, 2023. The working surface where feedstock/ digestate enters the facility from ADF has been repaired with asphalt.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 23A. June 13, 2023. Wastewater flowing off D-table working surface.



Photograph 23B. July 14, 2023. An asphalt berm has been installed to prevent discharge.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 24A. June 13, 2023. Wastewater flowing off D-table working surface.



Photograph 24B. July 14, 2023. An asphalt berm has been installed to prevent discharge.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 25A. June 13, 2023. Wastewater outside of the working surface within recently placed gravel.



Photograph 25B. July 14, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 26A. June 13, 2023. Wastewater flowing outside of the compost facility towards a lower landfill bench.



Photograph 26B. July 14, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 27A. June 13, 2023. Wastewater flowing from damaged pipe onto landfill surface.



Photograph 27B. July 14, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 28A. June 13, 2023. Collected wastewater beneath damaged pipe. Wastewater overflowing from bins.



Photograph 28B. July 14, 2023. There is no longer collected wastewater below the conveyance system.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 29A. June 13, 2023. Wastewater actively flowing from damaged pipes.



Photograph 29B. July 14, 2023. There is no longer wastewater below the conveyance system.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 30A. June 13, 2023. Wastewater actively flowing from damaged pipes.



Photograph 30B. July 14, 2023. There is no longer wastewater below the conveyance system.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 31A. June 13, 2023. Wastewater flowing from the D-table area towards a lower landfill bench.



Photograph 31B. July 14, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 32A. June 13, 2023. Pipe on bench where wastewater flows to the landfill north sediment basin.



Photograph 32B. July 14, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 33A. June 13, 2023. Wastewater flowing from the compost facility onto a landfill bench where it enters a stormwater pipe connected to the north sediment basin.



Photograph 33B. July 14, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 34A. June 13, 2023. Wastewater flowing from the compost facility onto a landfill bench where it enters a second stormwater pipe connected to the south sediment basin.



Photograph 34B. July 11, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 35A. June 13, 2023. Wastewater flowing along landfill bench over an unlined area of the landfill.



Photograph 35B. July 11, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 36A. June 13, 2023. Wastewater flowing along landfill bench over an unlined area of the landfill.



Photograph 36B. July 11, 2023. Stained soil has been removed and stored in a roll off bin.



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Photo Documentation of Corrective Actions – July 14, 2023



Photograph 37A. June 13, 2023. Wastewater flowing onto a landfill bench, over an unlined area of the landfill, where some wastewater enters a stormwater pipe while the remaining wastewater flows along bench into a second stormwater pipe. The first pipe (photo 32 and 33) connects to the north sediment basin and the second pipe (photo 34 and 37) connects to the south sediment basin.



Photograph 37B. July 11, 2023. Stained soil has been removed and stored in a roll off bin.



Attachment B

Central Coast Regional Water Quality Control Comments to Water and
Wastewater Management Plan, Email dated June 29, 2023

Jeanette Gonzales-Knight

From: Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>
Sent: Thursday, June 29, 2023 1:20 PM
To: John Kular
Cc: John Dewey; Caitlyn Teague; Dylan Ellis; Wilder, Christina; Brown, Kevin; Gonzales-Knight, Jeanette; Wilder, Marty
Subject: RE: CMU Water & Wastewater Plan
Attachments: Resource Center Water and WW Mgt Plan.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi John,

I have reviewed the updated Water and Wastewater Management Plan for the Tajiguas Compost Management Unit and have the following questions:

1. The plan doesn't clearly delineate between wastewater and stormwater, for example stormwater versus wastewater tanks. Wastewater/leachate is any liquid that contacts waste (feedstock, compost, additives, etc.). Section 2 indicates that the CMU storage tank can feed the stormwater storage tank. Is the stormwater tank used for storage of completely clean stormwater or wastewater?
2. Where is the stormwater tank located versus the CMU storage tank? Is there a map showing the locations of the different tanks?
3. Are the three tanks listed in section 2 proposed for compost wastewater reuse on the piles?
4. The plan states, "In general, the water board considers any industrial waters to be ineligible for disposal to the pond because the pond drains into the Pila Creek. Despite this restriction, the operator is proposing to mitigate the water quality of the collected stormwater such that it closely resembles stormwater runoff collected by the pond from the landfill surface." Compost wastewater is not considered industrial stormwater. Neither the IGP nor the Compost General Order permit the discharge of treated wastewater. If stormwater requires treatment, it is not stormwater, it is compost wastewater. Table 2 option 1 describes treating stormwater and then discharging the treated water through the stormwater overflow pipe to the landfill pond. Has the operator obtained an NPDES permit or separate WDR to discharge treated wastewater, as proposed in this plan?
5. Table 2 describes actions related to the ADF tank pad. Where is the ADF tank pad located and is it part of the compost facility that is covered under the Compost General Order?
6. The figure on PDF page 2 includes a dark blue line for water supply from well or runoff collection tank and appears to wrap around most of the facility. Does this represent a pipe? What does it feed?
7. Please provide details about wastewater reuse or other water use at the facility, such as information about any material used for odor control.
8. What are the contingency plans for wastewater management when the tanks fill up? Is there a contract in place to haul to a wastewater treatment plant or a contract in place to bring in additional tanks when needed?
9. Will there be a berm around the D-table area, as originally designed?

10. The currently approved Water and Wastewater Management Plan within the technical report references table 2 which includes scenarios for covering piles during rain events. Will the piles no longer be covered? How will the working surface be cleaned prior to stormwater diversion? This revised Water and Wastewater Management Plan is a standalone document and must include all relevant information related to how water and wastewater will be managed at the facility.
11. What does the onsite SCADA system monitor and control?
12. Are there sensors to estimate the volume of diverted water as stormwater?
13. Do the wastewater tanks still have an overflow structure or pipe? Does the overflow have a shut off valve or how will operators prevent the tank from overflowing?
14. Where will stormwater samples be taken?
15. Table 1 includes a remedy for issues related to the CMU deck and partial tarping of the compost and states, "Supervisor to make decision to contain wastewater or divert storm water much earlier (3 days) in advance of rain events." Please provide more details within the plan for how operators will prepare for a stormwater diversion event. Does this mean all compost and feedstock will be completely covered at least three days before diversion events? What about site sweeping and other procedures previously listed in the plan?
16. Table 1 also includes plans to empty baker tanks completely between stormwater events. Where will this water be emptied to?
17. What will trigger contingency measures to be implemented? Please specify within the report. The Compost General Order requires that detention ponds be maintained to capture runoff from a 25-year, 24-hour event. In other words, operators are required to always have the capacity to capture runoff from a 25-year, 24-hour event, even after a storm event. Since the use of tanks is proposed as an alternative to detention pond use, the operator must explain how the alternative provides equivalent water quality protection to the permit standard.
18. What will the new ceiling mounted ultrasonic sensors measure?
19. Table 1 includes information about baker tanks and the addition of new sensors. What do these sensors measure?
20. The submittal has a "draft" watermark. Please ensure all submittal are final versions of reports/plans.
21. Table 4 includes estimates for the total area of the facility. Why has the total area of the facility changed? Does the working surface still include the D-table area?

Please let me know if you have any questions or want to discuss.

Thanks,

Jordan Haserot

Water Resource Control Engineer

Land Disposal Unit

Central Coast Regional Water Quality Control Board

(805) 542-4781



From: John Kular <johnkularpe@gmail.com>

Sent: Tuesday, June 13, 2023 3:26 PM

To: Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>

Cc: John Dewey <john@deweygroup.com>; Caitlyn Teague <cteague@rinconconsultants.com>; Dylan Ellis <dylan@mustangrpv.com>

Subject: CMU Water & Wastewater Plan

EXTERNAL:

Regards,

John Kular, P.E.

John Kular Consulting

3790 Kingsbarns Drive

Roseville, CA 95747

johnkularpe@gmail.com

661-302-1292

Tajiguas Resource Center Water and Wastewater Management Plan

1. Wastewater Conveyance System

The wastewater conveyance system is shown on the 2023 Compost Site Plan. The composting area is also known as the Compost Management Unit or CMU. It consists of a sloped asphalt deck, perimeter asphalt-covered berms, four steel-grated drainage inlets, and a fused HDPE storm drain piping system which conveys the CMU runoff to two Baker Tanks. The drainage inlets are protected by concentric rings of straw/coco-fiber wattles. The Baker Tanks are equipped with internal baffle walls to trap coarse sediments. The Baker Tanks also have level sensors which can activate two 100-Hp pumps which pump the accumulated wastewater to the 380,000-gallon CMU Storage Tank. Each Baker Tank has 21,000 gallons capacity.

2. Wastewater Re-Use

The CMU Storage Tank has a 2-inch diameter discharge that feeds a 5 Hp pump. The pump discharges through two bag filters into a 2-inch diameter HDPE pipe which can feed any of the following:

1. 10,000-gallon storm water storage tank
2. 10,000-gallon recycled water tank (also fed by the ADF wastewater treatment system)
3. Two Percolate Tanks with combined 600,00-gallon capacity

The filtered wastewater can be re-used from the stormwater tank to condition the compost or it can be re-used to supplement the percolate tanks. The ADF percolate system consumes approximately 10,000 gallons per day under dry conditions. The water and wastewater balance with supporting calculations is described in greater detail in Section 5.

4. Compost and Percolate Water Needs

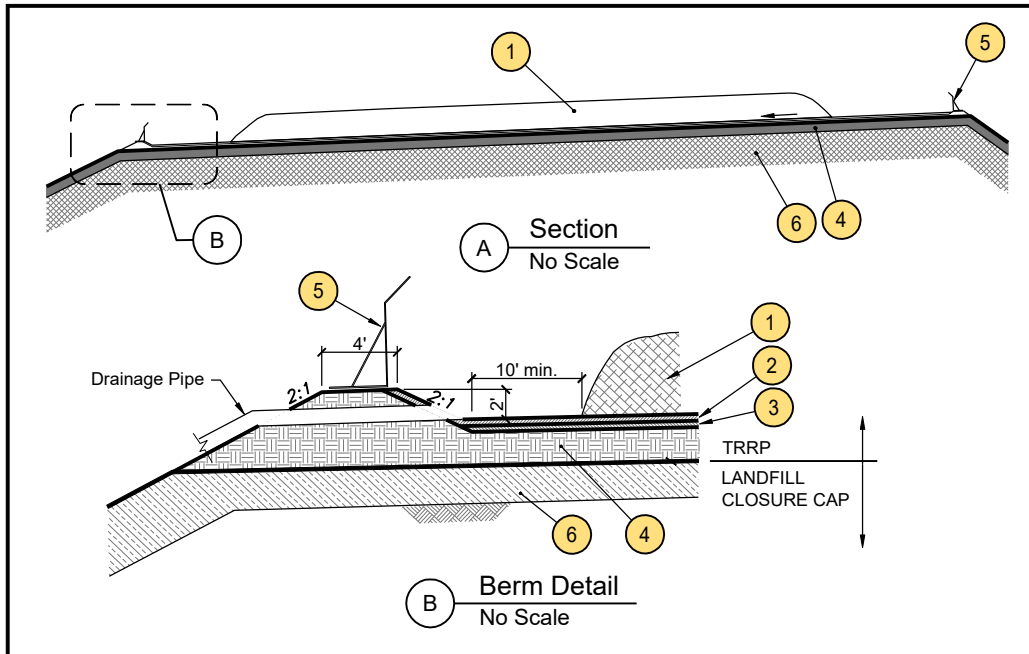
The priority is to feed the percolate tanks with captured CMU runoff. On average this captured volume will be 1.92 million gallons per year. At times, to provide capacity in the CMU storage tank, the runoff will be re-used to maintain compost moisture. The average amount of captured runoff diverted to this purpose is only 37,500 gallons per year. Supplementary well water required for compost conditioning is 71,000 gallons per year.

3. Problems Experienced in 2022/23 and Recommended Remedies

The Resource Center experienced numerous problems with the stormwater collection system during the winter of 2022/23 culminating in receiving a Notice of Violation from the Regional Water Board for failing to control and retain runoff in the manner prescribed in the CMU Technical Report and Waste Discharge Permit. The sources of these problems were primarily operational notwithstanding the extremely wet winter that was experienced. The total wet season rainfall was 36.4 inches of precipitation, far in excess of the average seasonal rainfall depth of 21.0 inches.

In order to prevent a repeated occurrence of these problems it is necessary to identify the sources of the problems and remedies to prevent recurrence. These are summarized in Table 1.

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LEGEND

- CMU Runoff Collection Pipe
- CMU Runoff to CMU Runoff Collection Tank
- Overflow Collection to North Sedimentation Basin
- Water Supply from Well or Runoff Collection Tank
- - - Dust Control Spray Pattern
- - - Permitted Waste Disposal Boundary
- - - Solid Waste Facility Permit Boundary

KEYNOTES

- ① Compost windrows
- ② 3" AC wearing course
- ③ MPV 600 paving mat over 3" AC base course
- ④ 12" min. compacted earth fill
- ⑤ Litter fence
- BT Baker Tank

AREAS

- Compost Windrows..... 1.78 ac
- Compost Stockpiles.... 0.62 ac
- Pavement..... 5.02 ac

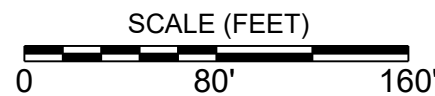
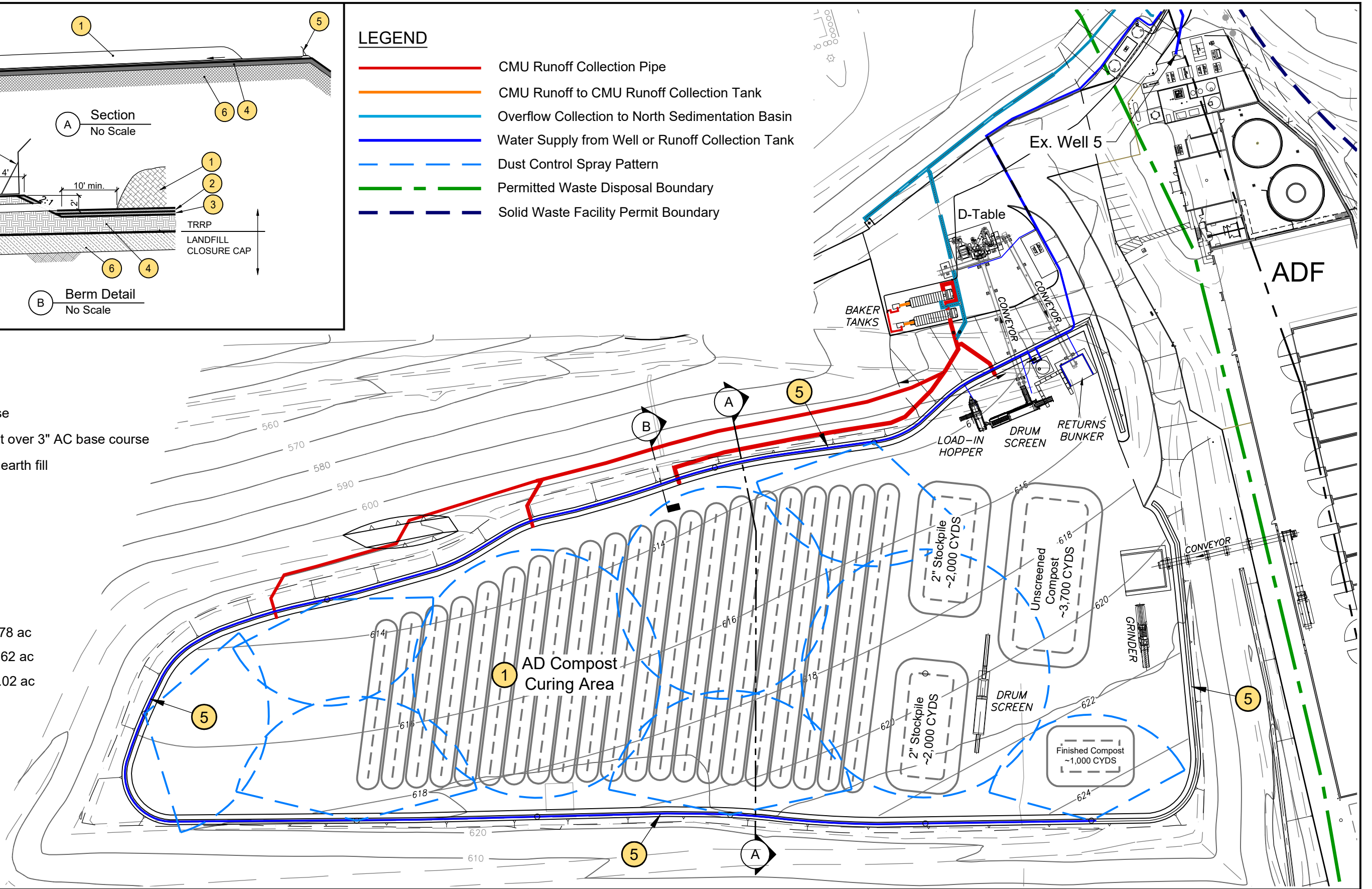


Table 1- Problems Experienced in 2022/23 and Recommended Remedies

Location	Problem	Cause	Remedies
CMU Deck	Damaged asphalt surface and berms.	Loader operator error.	Operator training
CMU Deck	Ponding on deck.	CMU differential settlement.	Install extension of storm drain system with 2 additional inlet locations.
CMU Deck	Wind dislodged tarps from compost windrows and stockpiles.	Inadequate anchorage of tarps.	Use sand-filled PVC pipes to weigh down edges of tarps rather than sandbags so that wind cannot lift tarps between sandbags.
CMU Deck	Partial tarping of compost resulted in increased runoff while preventing diversion of stormwater because the clean and dirty runoff mixed.	Operator error. Supervisors knew proper procedure but CMU laborers didn't understand importance of complete tarping of compost.	Operator training. Supervisor to make decision to contain wastewater or divert storm water much earlier (3 days) in advance of rain events.
CMU SD Inlets	Clogged Inlets	Inadequate compost tarp coverage.	Wider Tarps ordered, operator training to prepare for storms earlier, clean CMU deck better and install more wattles and gravel bags.
CMU storm drains	Pipes separated at joints, resulting in leakage.	CMU settlement. High winds, inadequate anchorage.	Install continuous-fused, jointless storm drain system with closer anchor spacing. Empty Baker Tanks completely between stormwater events to reduce water pressure on storm drains. Inspect anchors and storm drains regularly and adjust storm drain slope, augment anchors as the top deck settles.
Baker Tank	Pump #2 could not start in automatic mode, due to sensor malfunction.	Level Sensor #2 malfunction.	Replace sensors with type of sensor that is less susceptible to damage. New sensors are ceiling mounted, ultrasonic not cable-mounted, pressure style.
Baker Tank	Pump #1 stopped working during a rain event.	Debris trapped in winter 2021/22 was not	Baker tanks to be completely emptied during

		removed from Baker tanks in the dry months of 2022 and became lodged in the pump inlet pipe.	the dry season and all debris removed.
Baker Tank	Pumps stopped working for short durations during runoff events.	Debris lodged against level sensors.	Baker tanks to be completely emptied during the dry season and all debris removed. New sensors are ceiling mounted, ultrasonic not cable-mounted, pressure style.
Baker Tank	Could not accurately estimate Baker Tank overflow rates.	Level sensors are too close to pump inlets and provide inaccurate readings when pumps cycle on/off.	New sensors have been installed further from the pump inlets and will be in operation for September 2023.
CMU SW Tank	Could not send SW to percolate system as intended for long periods of time.	Percolate system clogging, temperature limitations.	More frequent acid-cleaning of percolate distribution system. Better management of percolate tank levels. Installed debris traps in percolate recycle system.

4. Wastewater Mitigation Options

The options below are intended to deal with a surplus of selected stormwater from the compost deck. The percolate system has been unable to consume sufficient water in the winter months to offset the collected stormwater from the compost deck. This is because the digestate is much wetter from the collected trash during rain events. The water board considers collected stormwater that has been in contact with compost to be classified as wastewater. Wastewater is not eligible to be disposed of to the landfill stormwater pond.

In general, the water board considers any industrial waters to be ineligible for disposal to the pond because the pond drains into the Pila Creek. Despite this restriction, the operator is proposing to mitigate the water quality of the collected stormwater such that it closely resembles stormwater runoff collected by the pond from the landfill surface.

Table 2- Summary of Stormwater/Wastewater Use Methods

	Option 1	Option 2	Option 3
Location	ADF Tank Pad	ADF Tank Pad	ADF Tank Pad
Components	Existing Bag filters, relocated MRF UV Treatment System	Existing Bag Filters	Existing Bag Filters

How it works	Stored water in CMU SW Storage Tank is pumped through the bag filter system and through the UV treatment system and is discharged through the CMU SW Tank overflow pipe to the CMU storm drain system to the landfill pond.	Stored water in CMU SW Storage Tank is pumped through the bag filter system to the ADF Percolate tanks for re-use.	Stored water in CMU SW Storage Tank is pumped through the bag filter system to the ADF SW storage tank for re-use to condition compost using tanker truck.
When it would be used	At operator discretion but generally when the CMU SW storage tank is >50% full and the rainy season is < 50% complete.	Whenever there is available water in the CMU CW Storage Tank and available space in the percolate tanks.	During warm weather months when compost moisture is suboptimum.
Limitations on use	Landfill pond level status. Treated water classification. UV treatment is limited to 30 gpm. Max. Daily flow rate = 43,200 GPD	Percolate tanks temperature limits rate of cool water transfer from CMU tank. Maximum flow rate is 12 gpm or 17,280 GPD due to pipe sizes at the percolate tanks.	When compost moisture is too high. Availability of transfer truck. Ability of transfer truck to apply water at proper rate and location.
Strategy Used?	Proposed	2022/2023	2022
Problems experienced	None, not implemented yet.	Percolate system malfunctions limited SW use. Cold winter of 2022/23 limited transfer rate to percolate system.	Excess runoff on CMU deck. Truck unavailable
Changes proposed	New system.	Provide operational guidelines and training to staff to implement this option in a more controlled manner to avoid lowering percolate system temperatures. Increase frequency of percolate system maintenance (acidic flushing of percolate distribution system) to keep system on-line without interruption.	Implement dual water source spray system. Using well water or storm water (when available).
Benefits of proposed change	Ability to treat and drain a relatively large quantity of stormwater from the CMU storage tank to make space for forecasted runoff events.		Can apply water to any location on the compost deck in a controlled spray. No dependence on availability of tanker

			truck or staff. Better opportunity to use SW during periodic dry periods during the rainy season.
--	--	--	---

5. New Strategy- Supporting Calculations

The CMU Technical Report included three sets of water balance calculations. They are briefly described in Table 3. Calculations #2 and #3 anticipated that the only re-use of collected storm water would be applied to the compost for moisture conditioning as the percolate supplementation was expected to be minimal. The CMU deck compost coverage was also theoretical. Actual operations have resulted in lower compost deck coverage and consequently higher runoff for the same rainfall. Therefore, new calculations were performed to adjust for these factors. The calculations are shown in Tables 4, 5 and 6.

Table 3- CMU Water Balance Calculations

#	Description	Purpose
1	Single 24-hour, 25-year storm HydroCAD Simulation	To size storm water runoff collection system per SWQCB regulations.
2	Annual water balance based on average rainfall and evaporation on a month-by-month basis	To size storm water runoff collection system (alternative method).
3	40-year simulation of site precipitation	To determine how often a stormwater diversion would occur based on daily rainfall depths from 1974-2017.

Table 4 – Summary of HydroCAD Simulations for 25 Year, 24-hour Rainfall (6.71 inches depth)

Variable	Units	2021 HydroCAD-Design	2023 HydroCAD-As-Built
Bare Asphalt	Acres	3.30	2.62
Compost	Acres	1.80	2.40
Total Area	Acres	5.13	5.02
Runoff Depth	Inches	2.21	3.18
Runoff Volume	Acre-feet	0.944	1.329*
Peak Flow	CFS	6.69	10.64

*New peak runoff volume exceeds available runoff storage by 11,000 gallons. One additional Baker tank is recommended to meet Compost Regulations storage requirements.

Table 5 - See following page.

Table 6 – See following pages for table. Summary Graph is below. Over the 42-year period the CMU is expected to divert run-off approximately four times based on the historical data.

TABLE 5 CMU MONTHLY WATER BUDGET																		
TAJIGUAS RESOURCE RECOVERY PROJECT																		
				Input	Calculated													
5/31/2023																		
Water Sources		ANNUAL	Units	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Totals/Aves	Source of data and/or calculation:	
Rainfall depth		21.0	inches	4.59	4.97	3.90	1.20	0.35	0.10	0.01	0.01	0.26	0.78	1.62	3.17	20.96	SBCFC Station 262 Gaviota Coast	
		1.75	feet	0.38	0.41	0.33	0.10	0.03	0.01	0.00	0.00	0.02	0.07	0.14	0.26	1.75		
	Monthly fraction		%	22%	24%	19%	6%	2%	0%	0%	0%	1%	4%	8%	15%	100%		
	Effective rainfall			0.37	0.40	0.32	0.09	0.02	0.00	0.00	0.00	0.01	0.06	0.13	0.25			
Evapotranspiration		48.5	inches	2.4	2.8	4	5	5.3	4.8	5.5	5.5	4.6	3.7	2.8	2.1	48.5	CIMIS	
			feet	0.20	0.23	0.33	0.42	0.44	0.40	0.46	0.46	0.38	0.31	0.23	0.18	4.04	Station 94	
	Monthly fraction		%	5%	6%	8%	10%	11%	10%	11%	11%	9%	8%	6%	4%	100%	Santa Ynez	
Runoff Calculation																		
		Area (SF)	C-value	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF		
CMU	Finished Compost stockpile	27007	0.10	1006	1092	851	243	52	0	0	0	32	149	338	686	4447		
	Compost windrows	77537	0.10	2888	3134	2442	698	149	0	0	0	90	426	969	1971	12768		
	Asphalt aisles	114127	0.90	38261	41514	32355	9244	1969	0	0	0	1198	5649	12839	26107	169136		
Runoff, Sum				42155	45739	35648	10185	2169	0	0	0	1320	6224	14146	28764	186351		
Compost rainwater absorption																		
		Area (SF)	K-value	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF		
CMU	Finished Compost stockpile	27007	0.90	9054	9824	7656	2188	466	0	0	0	284	1337	3038	6178	40024		
	Compost windrows	77537	0.90	25994	28204	21982	6280	1338	0	0	0	814	3838	8723	17737	114910		
Absorption, Sum				35048	38028	29638	8468	1803	0	0	0	1098	5175	11761	23914	154934		
Water Loss																		
			K-value	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF		
Evapotranspiration	Compost surface	SF	0.70	19133	22321	31888	39859	42251	38265	43845	43845	36671	29496	22321	16741			
Manipulation	Volume			1350	1350	1350	1350	1350	1350	1350	1350	1350	1350	1350	1350			
Heat	Compost weight	lbs	0.20	275	275	275	275	275	275	275	275	275	275	275	275		avg. daily	
Sum				20757	23946	33512	41484	43876	39890	45470	45470	38296	31121	23946	18366	406135	1128	
Net water use				-14291	-17082	1874	33016	42072	39890	45470	45470	37198	25946	12185	-5549	246201	684	
Moisture content of compost at end of month	start at 48%			51%	52%	48%	40%	38%	39%	37%	37%	39%	42%	45%	49%		target range is 40-60%, supplementary water required to maintain 40% min.	
avail tank storage	start of month	Max=	56504	56504	35739	14390	2133	13338	32559	53949	75340	96730	116800	131966	139211			
Added runoff to tank during month				42155	45739	35648	10185	2169	0	0	0	1320	6224	14146	28764	186351		
Water applied to compost from CMU storage				0	3000	2000	0	0	0	0	0	0	0	0	0	5000		
ADF percolate water consumption	160000 gal.	21390	CF	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	256684	
Tank storage end of month				20765	42114	54371	43166	23945	2555	-18836	-40226	-60296	-75462	-82707	-75333			
Storage % full				37%	75%	96%	76%	42%	5%									

Notes:

- 1 Surface area for evapotranspiration is for inclined surface area because that is the surface exposed to wind and sun.
- 2 All other surface areas are plan area surfaces. To use inclined surface for incident rainfall would essentially create extra rainfall depth.
- 3 C-value for compost runoff is same as C-value used in 40-year simulation for consistency.
- 4 K-value for water use constants to distinguish from runoff constant C-value.
- 5 Runoff constants may seem low but these are not single storm event runoff constants.
- 6 ADF percolate consumption added in 2023.
- 7 Negative tank storage means supplementary well water is needed for percolate and/or compost conditioning.

85600	compost weight in lbs
0.1	cumulative deficiency in m.c.
8.345	lb/gal
71433	gallons supplementary water

HYDROCAD CALCULATION FOR 25-YR, 24- HR STORM

TRRP CMU 2023 Revised Areas

Prepared by John Kular Consulting

HydroCAD® 10.20-2g s/n 07434 © 2022 HydroCAD Software Solutions LLC

Type I 24-hr 25 YEAR Rainfall=6.71"

Printed 5/31/2023

Page 2

Summary for Subcatchment 4S: CMU pad CN 36 98

Runoff = 10.64 cfs @ 10.04 hrs, Volume= 1.329 af, Depth= 3.18"
 Routed to nonexistent node 6P

Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-30.00 hrs, dt= 0.05 hrs
 Type I 24-hr 25 YEAR Rainfall=6.71"

Area (ac)	CN	Description
* 2.620	98	AC aisles
* 2.400	36	compost piles
5.020	68	Weighted Average
2.400		47.81% Pervious Area
2.620		52.19% Impervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
12.0					Direct Entry,

Subcatchment 4S: CMU pad CN 36 98

Hydrograph

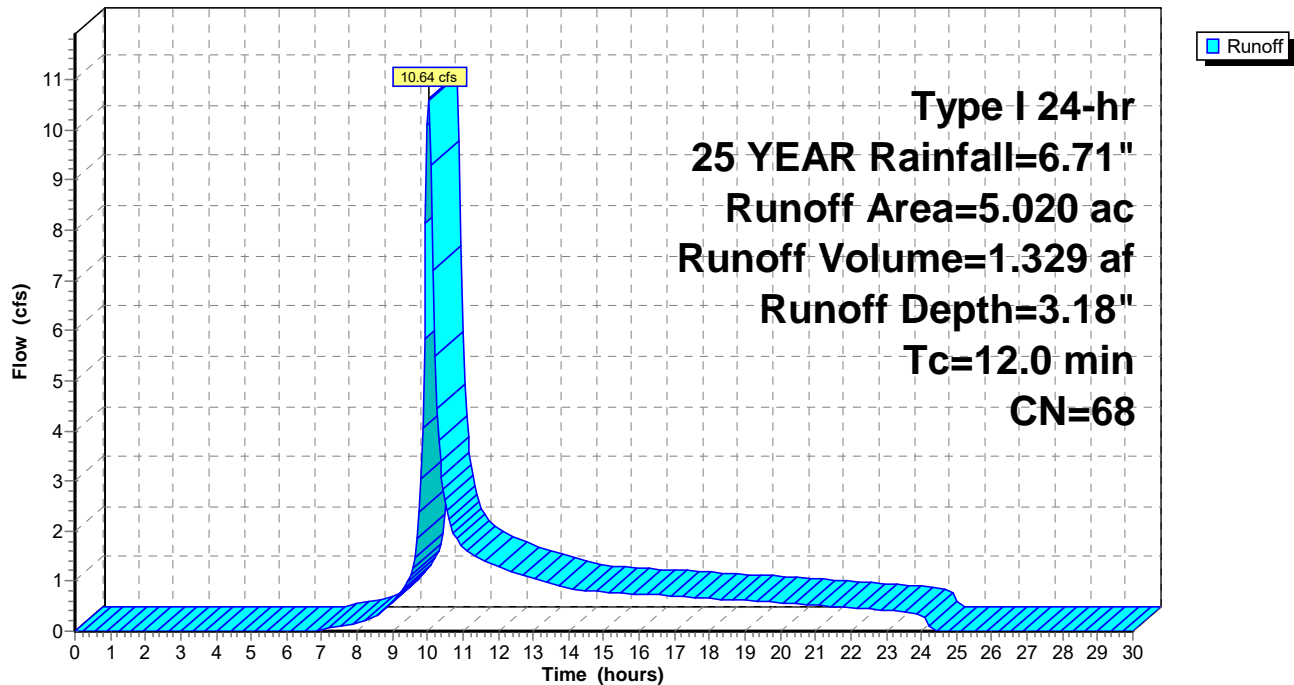
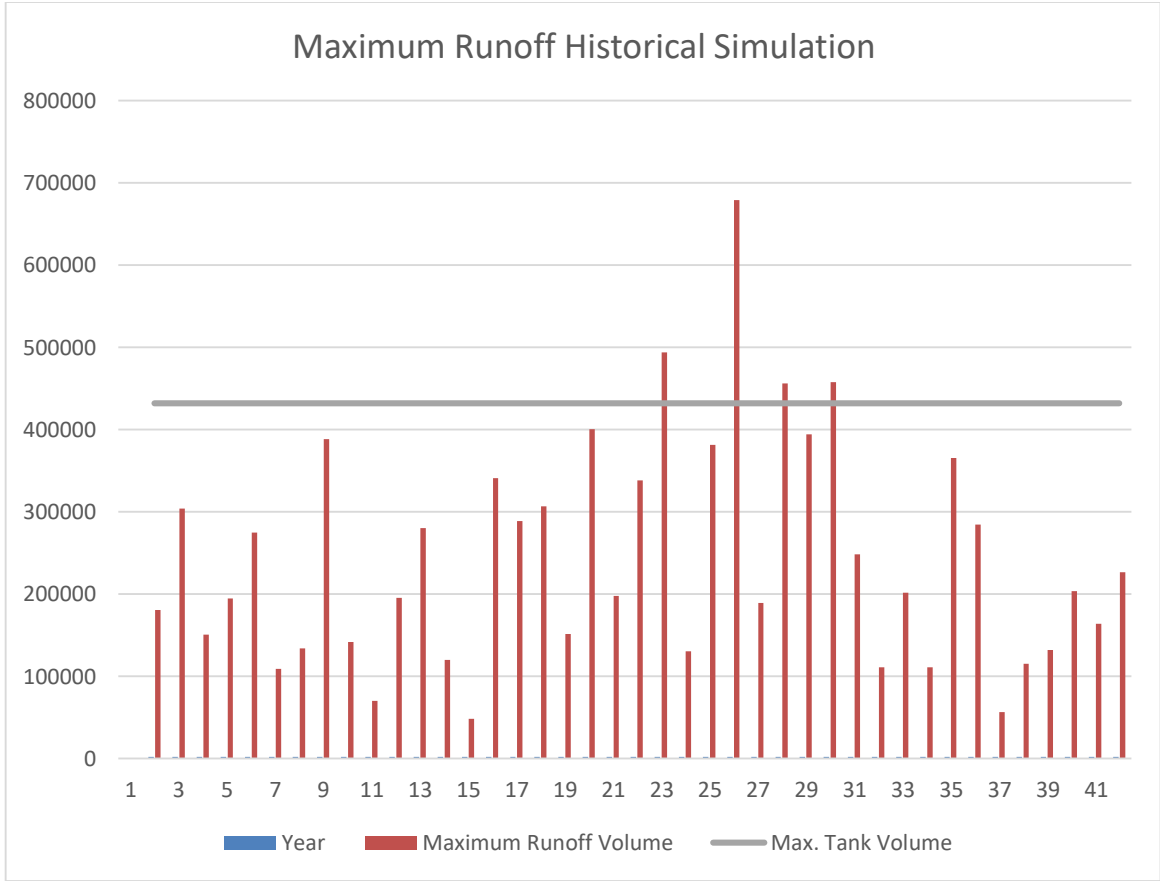


TABLE 6 SUMMARY GRAPH



DRAFT

Attachment C

Central Coast Regional Water Quality Control Comments to Water and
Wastewater Management Plan, Email dated August 28, 2023

Jeanette Gonzales-Knight

From: Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>
Sent: Monday, August 28, 2023 1:09 PM
To: Caitlyn Teague
Cc: John Dewey; John Kular; Dylan Ellis; Matthew Dunn; Gerardo Pinelas; Thomas Sanford; Kiernan Brtalik; Christina Wilder; Jeanette Gonzales-Knight; Kevin Brown
Subject: RE: Tajiguas CMU Water and Wastewater Management Plan - August 16, 2023
Attachments: RE: CMU Water & Wastewater Plan

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Caitlyn,

Thank you for the submittal.

I reviewed the revised Water and Wastewater Management Plan. However, the Plan still appears to be deficient. The August 16, 2023, Tajiguas Water and Wastewater Management Plan does not answer a number of questions that were asked via email on June 29, 2023, for the previous submitted version of the Plan including questions 6, 7, 9, 10, 13, 15, 17, 18, and 19 (email attached). Below are some outstanding questions in addition to the questions provided in the previous email.

Related to previous question 7 and the odor control section. Please list the compounds used for odor control within the Plan. Is wastewater reused and sprayed using the misters? Has the LEA approved this use? I have concerns with misting wastewater on the perimeter of the facility. Due to workers health and safety concerns that would allow workers to inhale misted wastewater, we cannot approve this use of wastewater.

Related to previous question 15. Will the site prevent additional material from entering the compost facility when diversion procedures begin, as a way to ensure that all compost, feedstock, and materials are fully covered three days prior to diversion and to help ensure that the swept working surface remains clean? Please expand on this section and be specific what procedures will be put in place three days prior to diversion.

Related to previous question 17. As discussed during our meeting on July 26, 2023, the plan must specify what will trigger operators to implement contingency measures such as bringing in additional tanks for wastewater storage. As previously discussed, the proposed Water and Wastewater Management Plan must indicate how the operator will provide equivalent water quality protection to the permit standard of detention ponds being maintained to capture runoff from a 25-year, 24-hour storm.

The Plan states, “[n]ew peak runoff volume exceeds available runoff storage by 11,000 gallons. One additional Baker tank is recommended to meet Compost Regulations storage requirements.” When will the new Baker tank be brought to the site and where will the permanent tank be located?

The wastewater reuse section states that, “[t]he CMU storage tank feeds the 10,000-gallon recycled water tank.” Where is the recycled water tank located on Exhibit 2? Does this mean that recycled water and compost wastewater would be mixed in this tank? Is this tank exclusively used for reused

wastewater used on the compost? My understanding is that the recycled water is sprayed via a sprinkler system near the MRF and is permitted under a separate WDR. Recycled water used for this use must not be comingled with wastewater.

I recall there being issues with overflow and wastewater discharge outside of normal work hours this past rainy season, which resulted in potential unknown discharges and difficulty fully estimating overflow discharges. The Plan states, “[t]he runoff and wastewater items monitored by SCADA do not generate alarms.” If there are no alarms for the SCADA system, and if the CMU runoff tank exceeds capacity and wastewater flows out of the overflow pipe, how will operators be notified of an issue and how will the volume of discharge be estimated?

The extent of the D-table isn’t clearly delineated on maps, and the new berm doesn’t appear to be shown. Please ensure that maps clearly delineate all CMU areas and berms. Compost has been documented on the D-table area during previous inspections and there is a concern about wastewater generation from compost contacting stormwater and running offsite. Since the D-table isn’t fully enclosed, the report must indicate how wastewater on the D-table will be managed and/or prevented.

Please let me know if you have any questions or would like to discuss.

Jordan Haserot

Water Resource Control Engineer
Land Disposal Unit
Central Coast Regional Water Quality Control Board
(805) 542-4781



From: Caitlyn Teague <cteague@rinconconsultants.com>
Sent: Thursday, August 17, 2023 7:16 AM
To: Haserot, Jordan@Waterboards <Jordan.Haserot@Waterboards.ca.gov>
Cc: John Dewey <john@deweygroup.com>; John Kular <johnkularpe@gmail.com>; Dylan Ellis <Dylan@mustangrpv.com>; Matthew Dunn <mdunn@rinconconsultants.com>; Gerardo Pinelas <Gerardo@mustangrpv.com>; Thomas Sanford <tsanford@rinconconsultants.com>; Kiernan Brtalik <kbrtalik@rinconconsultants.com>; Wilder, Christina <cwilder@countyofsb.org>; Gonzales-Knight, Jeanette <jgonzal@countyofsb.org>; Brown, Kevin <kevbrown@countyofsb.org>
Subject: Tajiguas CMU Water and Wastewater Management Plan - August 16, 2023

EXTERNAL:

Good morning Jordan,
On behalf of Mustang Renewable Power Ventures, LLC. (Discharger), the revised Tajiguas CMU Water and Wastewater Management Plan is attached for your review and approval. Please let us know if you have any questions or requests.

Thank you,
Caitlyn

Caitlyn Teague, QSD/P, QISP, Sr. Environmental Scientist
(She/Her/Hers)

805-644-4455 Main | 805-509-8399 Mobile | 805-586-3208 Direct
cteague@rinconconsultants.com



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Time Off Alert: 08/17 – 08/19

Tajiguas Resource Center Water and Wastewater Management Plan

1. Terminology Used in This Document

The California State Water Resources Control Board (Water Board) and CalRecycle define leachate as any liquid formed by the drainage of liquids from waste or by the percolation or flow of liquid through waste (27 CCR § 20164). The Wastewater Division of the Water Board and County Environmental Health Department (EHD) both use the term wastewater to refer to sanitary sewage. For consistency with Appendix B of the MRP, this document will use the term wastewater for storm water runoff that has come into contact with compost. The term leachate will not be used. Piping that conveys storm water runoff and or wastewater will be called storm drains.

2. Wastewater Conveyance System

The wastewater conveyance system is shown on the 2023 Composting Area Site Plan. The composting area is also known as the Compost Management Unit or CMU. It consists of a sloped asphalt deck, perimeter asphalt-covered berms, four steel-grated drainage inlets, and a fused HDPE storm drain piping system which conveys the CMU runoff to two Baker Tanks. The drainage inlets are always protected by concentric rings of straw/coco-fiber wattles. Wattles are replaced as required. The Baker Tanks are equipped with internal baffle walls to trap coarse sediments. The Baker Tanks also have level sensors which can automatically activate two 100-Hp pumps which pump the accumulated wastewater to the 380,000-gallon CMU Runoff Collection Tank. Each Baker Tank has 21,000 gallons capacity.

3. Stormwater Diversion

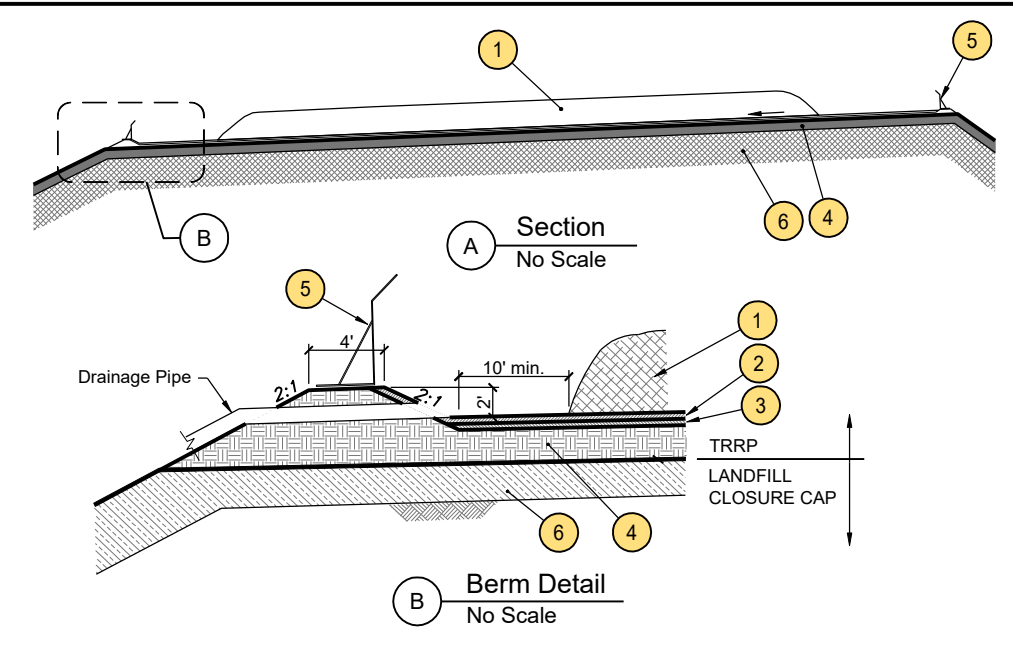
In the event that insufficient wastewater storage is available to store runoff from a forecasted rain event, the operator will prepare the site for a stormwater diversion to the landfill's northern sedimentation basin. Preparations will include:

- 100% tarp coverage of all compost windrows and material stockpiles,
- mechanical and hand sweeping of asphalt areas,
- weighing down of tarpaulins to prevent displacement by wind,
- hand-operated closure of valves to divert collected runoff to bypass the Baker tanks,
- sampling of the runoff during the bypass event to verify stormwater quality.
- as all diversions are by definition instigated by the operator, sampling will be manual rather than automatic.
- A flow meter will be installed on the diversion pipe.

4. Wastewater Re-Use

The CMU Runoff Collection Tank has a 2-inch diameter steel discharge pipe that feeds a 5 Hp pump. The pump discharges through two bag filters into a 2-inch diameter HDPE pipe which can feed any of the following:

1. 10,000-gallon wastewater storage tank.
2. 10,000-gallon recycled water tank (also fed by the ADF wastewater treatment system)
3. Two Percolate Tanks with combined 600,00-gallon capacity



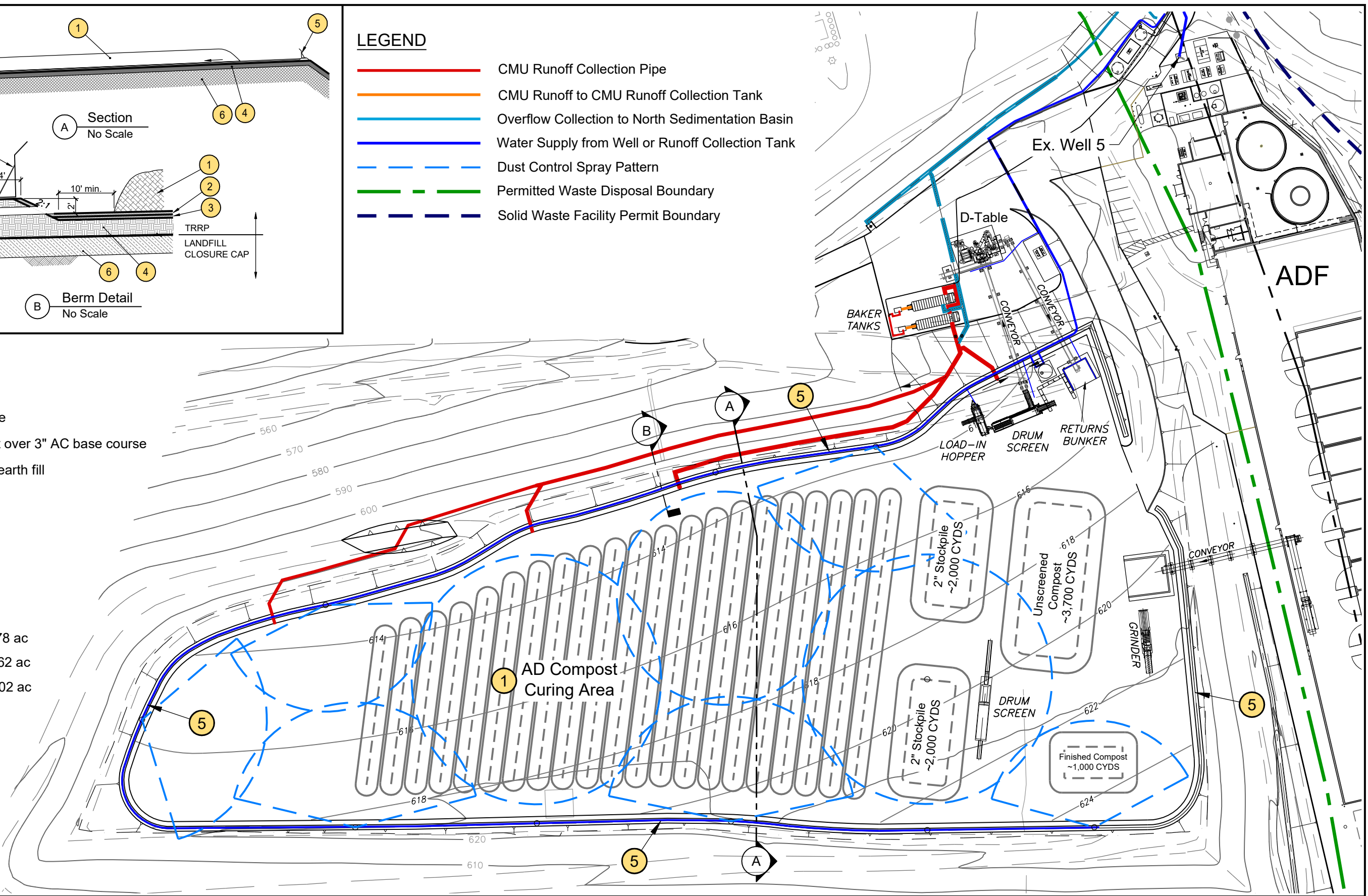
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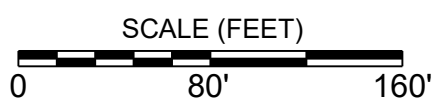
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- Pavement..... 5.02 ac



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Prepared by:
John Kular Consulting
 890 Lindamere Ct, Simi Valley, CA 93065
 661-302-1292 kularconsult.com



Tajiguas ReSource Center
2023 COMPOSTING AREA SITE PLAN

The tank locations are shown on the exhibit below, entitled 2023 CMU Composting Area Site Plan. The filtered wastewater can be re-used from the wastewater tank to condition the compost or it can be re-used to supplement the percolate tanks. The ADF percolate system consumes approximately 10,000 gallons per day under dry conditions. The water and wastewater balance with supporting calculations is described in greater detail in Section 9.

5. Odor Control

Currently the ADF and CMU facilities use misters to spray deodorant at the ADF door, the ADF to CMU conveyor and around the east and south CMU fence lines. The deodorant is primarily intended to address ADF digestate odors and compost odor during windrow turning operations. Re-use of filtered CMU wastewater is not odorous relative to these afore-mentioned sources.

6. SCADA System

The Resource Center SCADA system monitors several hundred items but relevant to the WWMP it monitors all tank levels and Baker tank pump run status. This information together with NOAA weather forecasts enables the CMU and ADF operators to make timely decisions with respect to CMU effluent re-use and storm event preparations. The runoff and wastewater items monitored by SCADA do not generate alarms. On-site operator intervention is required to override automatic pump functions. The pumps turn on and off automatically in response to water levels in the tanks.

7. Compost and Percolate Water Needs

The priority is to feed the percolate tanks with captured CMU runoff (wastewater). On average this captured volume will be 1.92 million gallons per year. At times, to provide capacity in the CMU Runoff Collection Tank, the filtered wastewater will be re-used to maintain compost moisture. The average amount of captured wastewater diverted to this purpose is only 37,500 gallons per year. Supplementary well water required for compost conditioning is 71,000 gallons per year.

8. Problems Experienced in 2022/23 and Recommended Remedies

The Resource Center experienced numerous problems with the stormwater collection system during the winter of 2022/23 culminating in receiving a Notice of Violation from the Regional Water Board for failing to control and retain runoff in the manner prescribed in the CMU Technical Report and Waste Discharge Permit. The sources of these problems were primarily operational notwithstanding the extremely wet winter that was experienced. The total wet season rainfall was 36.4 inches of precipitation, far in excess of the average seasonal rainfall depth of 21.0 inches.

In order to prevent a repeated occurrence of these problems it is necessary to identify the sources of the problems and remedies to prevent recurrence. These are summarized in Table 1.

Table 1- Problems Experienced in 2022/23 and Recommended Remedies

Location	Problem	Cause	Remedies
CMU Deck	Damaged asphalt surface and berms.	Loader operator error.	Operator training
CMU Deck	Ponding on deck.	CMU differential settlement.	Install extension of storm drain system with 2 additional inlet locations.
CMU Deck	Wind dislodged tarps from compost windrows and stockpiles.	Inadequate anchorage of tarps.	Use sand-filled PVC pipes to weigh down edges of tarps rather than sandbags so that wind cannot lift tarps between sandbags.
CMU Deck	Partial tarping of compost resulted in increased runoff while preventing diversion of stormwater because the clean and dirty runoff mixed.	Operator error. Supervisors knew the proper procedure but CMU laborers didn't understand importance of complete tarping of compost.	Operator training. Supervisor to make decision to contain wastewater or divert storm water to the sediment basin much earlier (3 days) in advance of rain events. This will provide enough time for complete coverage of compost and feedstocks plus a thorough cleaning of asphalt areas.
CMU SD Inlets	Clogged Inlets	Inadequate compost tarp coverage.	Wider Tarps ordered, operator training to prepare for storms earlier, clean CMU deck better and install more wattles and gravel bags.
CMU storm drains	Pipes separated at joints, resulting in leakage.	CMU settlement. High winds, inadequate anchorage.	Install continuous-fused, jointless storm drain system with closer anchor spacing. Temporarily empty Baker Tanks completely between stormwater events to reduce water pressure on storm drains until jointed pipe is replaced with fused pipe. Inspect anchors and storm drains regularly and adjust storm drain slope, augment anchors as the top deck settles. Install asphalt curb around north and west side of Baker tanks to trap leaked fluids.
Baker Tank	Pump #2 could not start in automatic mode, due to sensor malfunction.	Level Sensor #2 malfunction.	Replace sensors with type of sensor that is less susceptible to damage. New sensors are ceiling mounted, ultrasonic not cable-mounted, pressure style which

			were subject to fouling with captured debris.
Baker Tank	Pump #1 stopped working during a rain event.	Debris trapped in winter 2021/22 was not removed from Baker tanks in the dry months of 2022 and became lodged in the pump inlet pipe.	Baker tanks to be completely emptied during the dry season and all debris removed.
Baker Tank	Pumps stopped working for short durations during runoff events.	Debris lodged against level sensors.	Baker tanks to be completely emptied during the dry season and all debris removed. New sensors are ceiling mounted, ultrasonic not cable-mounted, pressure style.
Baker Tank	Pipe connections leaked	CMU surface settlement caused pipe joints to separate.	Replace nested, jointed pipe with fused pipe joints.
Baker Tank	Could not accurately estimate Baker Tank overflow rates.	Level sensors are too close to pump inlets and provide inaccurate readings when pumps cycle on/off.	New sensors have been installed further from the pump inlets and will be in operation for September 2023.
CMU Storage Tank	Could not send SW to percolate system as intended for long periods of time.	Percolate system clogging, temperature limitations.	More frequent acid-cleaning of percolate distribution system. Better management of percolate tank levels. Installed debris traps in percolate recycle system.

9. Wastewater Mitigation Options

The options below are intended to deal with a surplus of wastewater from the compost deck. The percolate system has been unable to consume sufficient water in the winter months to offset the collected wastewater from the compost deck. This is because the digestate is much wetter from the collected trash during rain events. The Water Board considers collected stormwater that has been in contact with compost to be classified as wastewater as discussed in Section 1. Wastewater is not eligible to be discharged to the Tajiguas Landfill Sediment Basins.

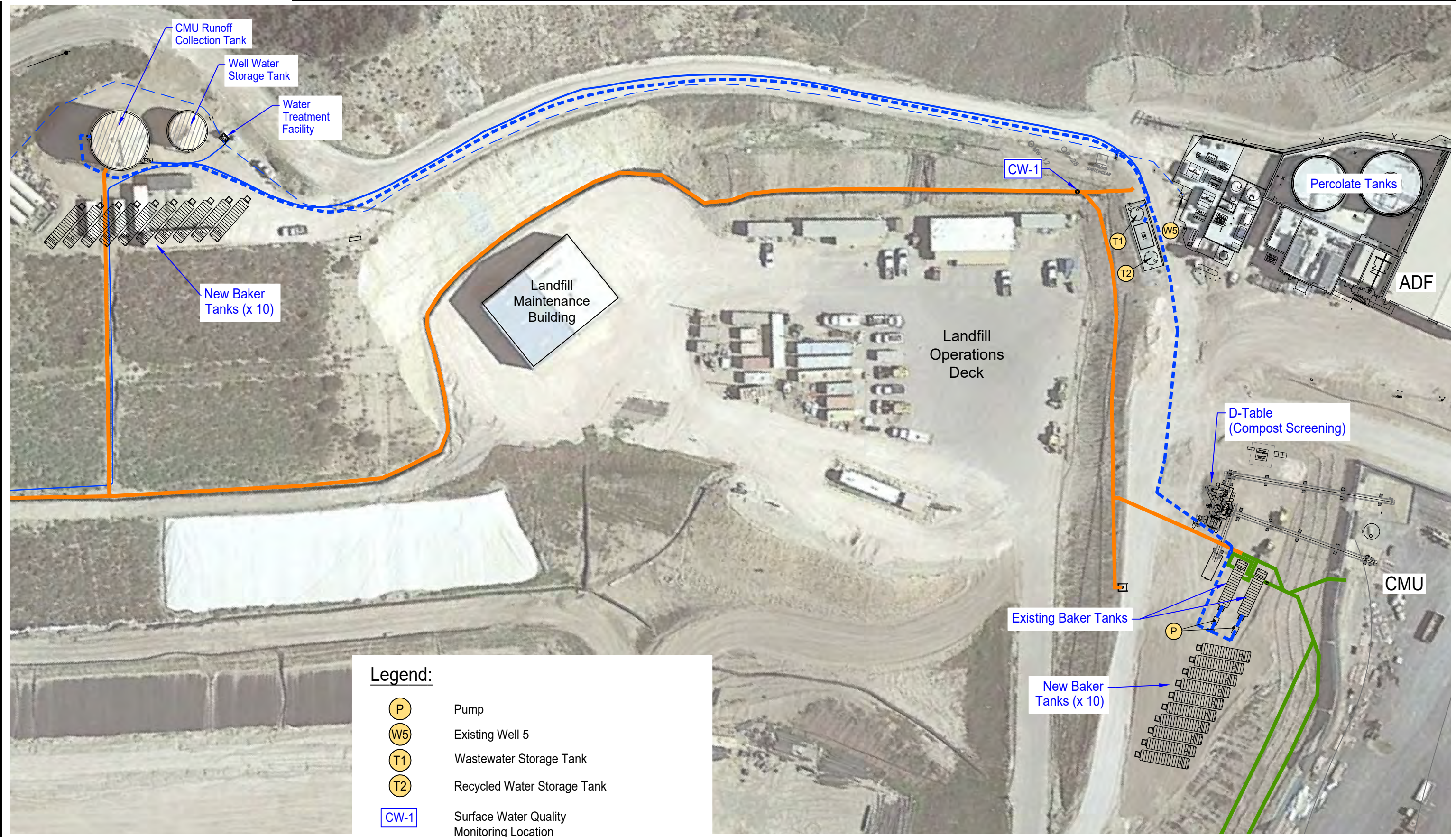
Table 2- Summary of Wastewater Use Options

	Option 1- existing	Option 2- existing
Location	ADF Tank Pad	ADF Tank Pad
Components	Existing Bag Filters	Existing Bag Filters
How it works	Stored water in CMU Runoff Collection Tank is pumped through the bag filter system to the ADF Percolate tanks for re-use.	Stored water in CMU Runoff Collection Tank is pumped through the bag filter system to the ADF Wastewater storage tank for re-use to condition compost using vacuum truck.
When it would be used	Whenever there is available water in the CMU Runoff Collection Tank and available space in the percolate tanks.	During warm weather months when compost moisture is suboptimum.
Limitations on use	Percolate tanks temperature limits rate of cool water transfer from CMU tank. Maximum flow rate is 12 gpm or 17,280 GPD due to pipe sizes at the percolate tanks.	When compost moisture is too high. Availability of vacuum truck. Ability of vacuum truck to apply water at proper rate and location.
Strategy Used?	2022/2023	2022
Problems experienced	Percolate system malfunctions limited wastewater re-use. Cold winter of 2022/23 limited transfer rate to percolate system.	Excess runoff on CMU deck. Truck unavailable.
Changes proposed	Provide operational guidelines and training to staff to implement this option in a more controlled manner to avoid lowering percolate system temperatures. Increase frequency of percolate system maintenance (acidic flushing of percolate distribution system) to keep system on-line without interruption.	Implement dual water source spray system as shown on the 2023 Composting Area Site Plan. Using well water or captured runoff (when available).
Benefits of option		Can apply water to any location on the compost deck in a controlled spray. No dependence on availability of tanker truck or staff. Better opportunity to use wastewater during periodic dry periods during the rainy season.

10. Contingency Plans

During the winter of 2022/23, the runoff capacity storage was exceeded several times due to successive heavy rainfalls and the inability of the ADF percolate system to accept wastewater due to equipment malfunctions. Despite the improved procedures described in Section 5, it is conceivable that the runoff capacity storage could be exceeded in the future and that some other cause may prevent the diversion of site runoff which has not contacted compost. In such cases, the contingency plan would be to rent additional baker tanks to be temporarily installed on the landfill operations deck. The operator has a master agreement in place with Pacific Petroleum to rent the tanks and transfer pumps. High-capacity

S:\Work\Projects\Tajiguas\Drawings\CMU\Exhibits\CMU Exhibit 2 - Contingency Plan.dwg 8/16/2023 2:59 PM



Legend:

- P Pump
- W5 Existing Well 5
- T1 Wastewater Storage Tank
- T2 Recycled Water Storage Tank
- CW-1 Surface Water Quality Monitoring Location
- Runoff Collection
- 25-yr/24-hr Runoff to CMU Runoff Collection Tank
- Overflow Collection to North Sedimentation Basin
- Water Supply from Well or Runoff Collection Tank

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rented trash pumps would transfer collected wastewater from the CMU baker tanks to the rented tanks. Space has been identified on the Resource Center footprint to temporarily store 20 Baker Tanks which would double available storage capacity or the equivalent volume to runoff from two times the 25-year, 24-hour storm. See Exhibit 2 – Contingency Plan.

11. New Strategy- Supporting Calculations

The CMU Technical Report included three sets of water balance calculations. They are briefly described in Table 3. Calculations #2 and #3 anticipated that the only re-use of collected wastewater would be applied to the compost for moisture conditioning as the percolate supplementation was expected to be minimal. The CMU deck compost coverage was also theoretical. Actual operations have resulted in lower compost deck coverage and consequently higher runoff for the same rainfall. Therefore, new calculations were performed to adjust for these factors. The calculations are shown in Tables 4, 5 and 6.

Table 3- CMU Water Balance Calculations

#	Description	Purpose
1	Single 24-hour, 25-year storm HydroCAD Simulation	To size storm water runoff collection system per SWQCB regulations.
2	Annual water balance based on average rainfall and evaporation on a month-by-month basis	To size storm water runoff collection system (alternative method).
3	40-year simulation of site precipitation	To determine how often a stormwater diversion would occur based on daily rainfall depths from 1974-2017.

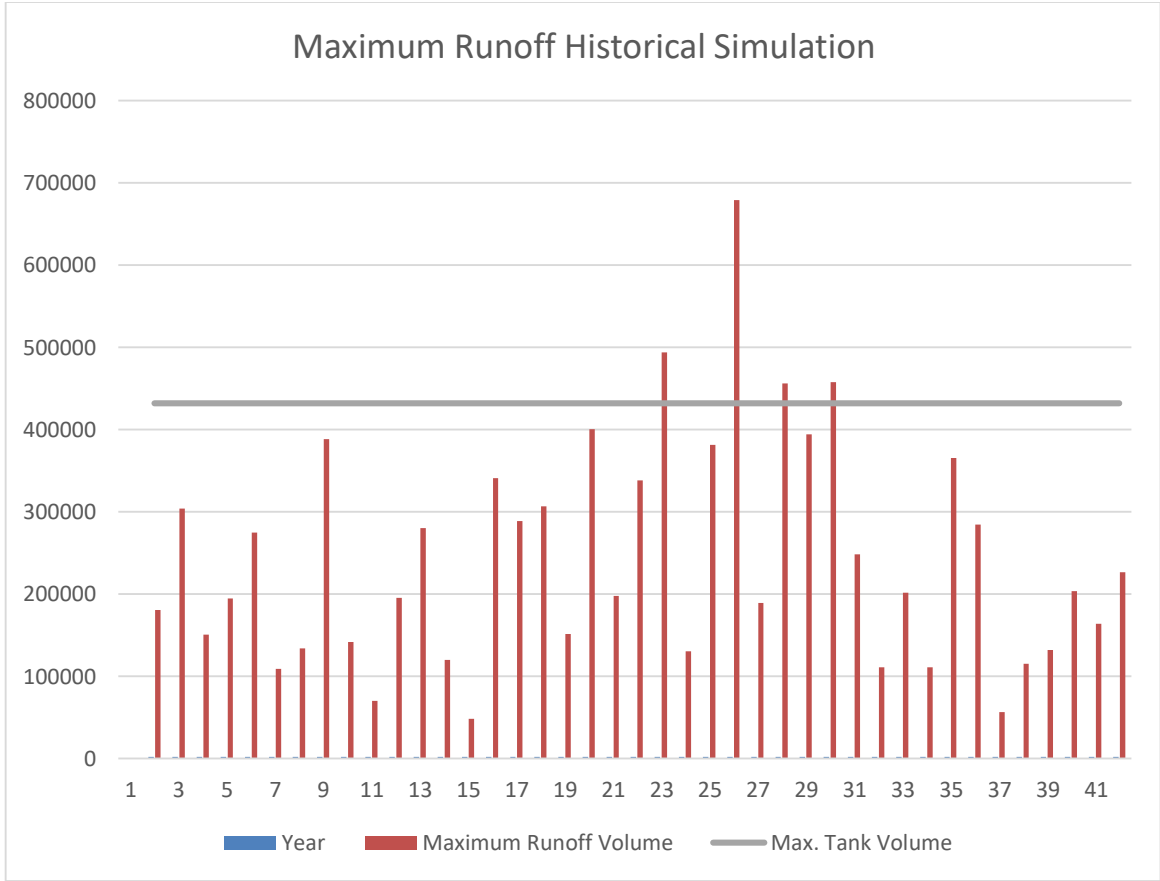
Table 4 – Summary of HydroCAD Simulations for 25 Year, 24-hour Rainfall (6.71 inches depth)

Variable	Units	2021 HydroCAD-Design	2023 HydroCAD-As-Built
Bare Asphalt	Acres	1.80	2.62
Compost	Acres	3.30	2.40
Total Area	Acres	5.13	5.02
Runoff Depth	Inches	2.21	3.18
Runoff Volume	Acre-feet	0.944	1.329*
Peak Flow	CFS	6.69	10.64

*New peak runoff volume exceeds available runoff storage by 11,000 gallons. One additional Baker tank is recommended to meet Compost Regulations storage requirements.

Table 5 - See following page.

Table 6 – See following pages for table. Summary Graph is below. Over the 42-year period the CMU is expected to divert run-off approximately four times based on the historical data.



TRRP CMU AUG 2020 new tank location

Type I 24-hr 25 YEAR Rainfall=6.71"

Prepared by John Kular Consulting

Printed 4/5/2021

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Summary for Subcatchment 4S: CMU pad

Runoff = 6.69 cfs @ 10.05 hrs, Volume= 0.947 af, Depth= 2.21"

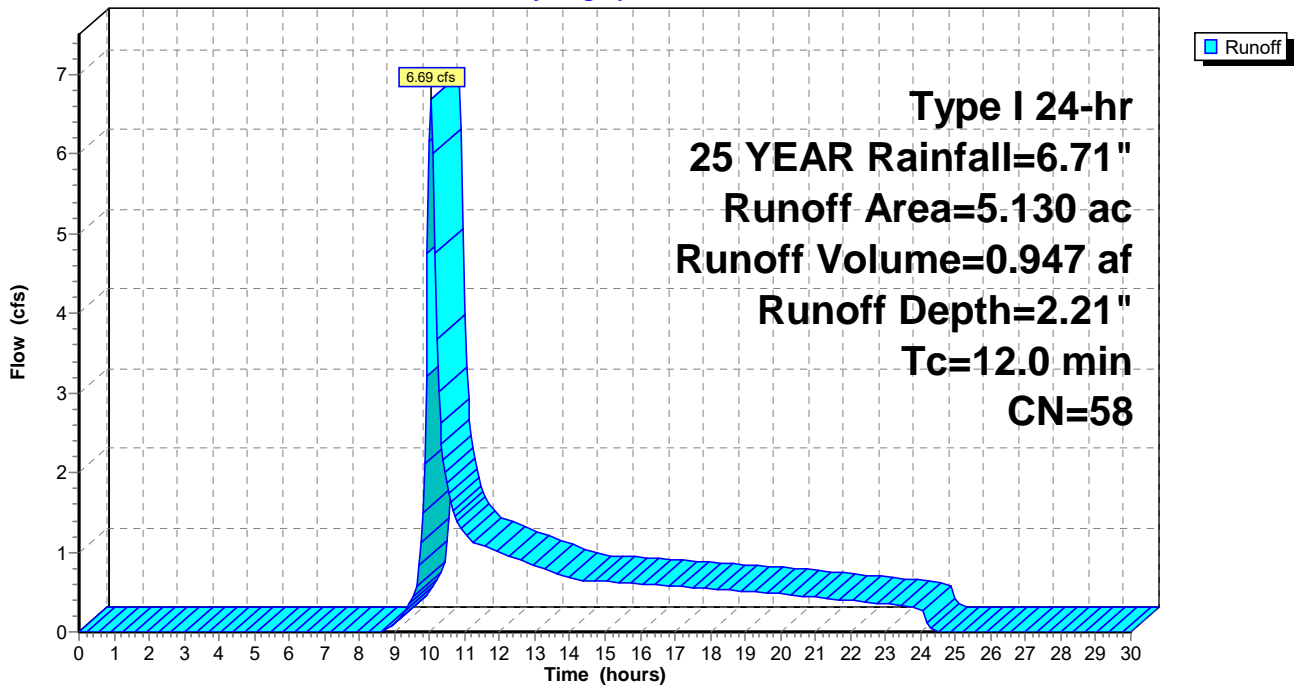
Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-30.00 hrs, dt= 0.05 hrs
 Type I 24-hr 25 YEAR Rainfall=6.71"

Area (ac)	CN	Description
* 1.800	98	AC aisles
* 3.330	36	compost piles
5.130	58	Weighted Average
3.330		64.91% Pervious Area
1.800		35.09% Impervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
12.0					Direct Entry,

Subcatchment 4S: CMU pad

Hydrograph



TRRP CMU 2023 Revised Areas

Prepared by John Kular Consulting

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Type I 24-hr 25 YEAR Rainfall=6.71"

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Summary for Subcatchment 4S: CMU pad CN 36 98

Runoff = 10.64 cfs @ 10.04 hrs, Volume= 1.329 af, Depth= 3.18"
 Routed to nonexistent node 6P

Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-30.00 hrs, dt= 0.05 hrs
 Type I 24-hr 25 YEAR Rainfall=6.71"

Area (ac)	CN	Description
* 2.620	98	AC aisles
* 2.400	36	compost piles
5.020	68	Weighted Average
2.400		47.81% Pervious Area
2.620		52.19% Impervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
12.0					Direct Entry,

Subcatchment 4S: CMU pad CN 36 98

Hydrograph

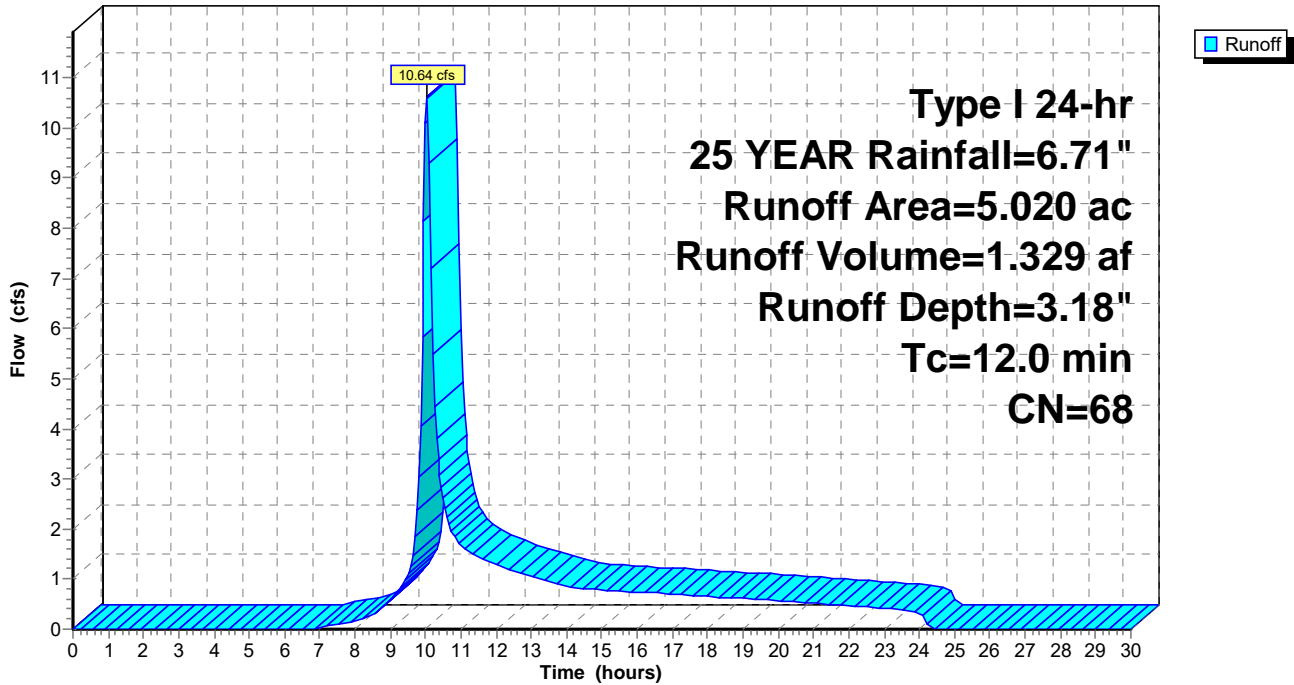


TABLE 5 CMU MONTHLY WATER BUDGET																		
TAJIGUAS RESOURCE RECOVERY PROJECT																		
				Input	Calculated													
5/31/2023																		
Water Sources		ANNUAL	Units	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Totals/Aves	Source of data and/or calculation:	
Rainfall depth		21.0	inches	4.59	4.97	3.90	1.20	0.35	0.10	0.01	0.01	0.26	0.78	1.62	3.17	20.96	SBCFC Station 262 Gaviota Coast	
		1.75	feet	0.38	0.41	0.33	0.10	0.03	0.01	0.00	0.00	0.02	0.07	0.14	0.26	1.75		
	Monthly fraction		%	22%	24%	19%	6%	2%	0%	0%	0%	1%	4%	8%	15%	100%		
	Effective rainfall			0.37	0.40	0.32	0.09	0.02	0.00	0.00	0.00	0.01	0.06	0.13	0.25			
Evapotranspiration		48.5	inches	2.4	2.8	4	5	5.3	4.8	5.5	5.5	4.6	3.7	2.8	2.1	48.5	CIMIS	
			feet	0.20	0.23	0.33	0.42	0.44	0.40	0.46	0.46	0.38	0.31	0.23	0.18	4.04	Station 94	
	Monthly fraction		%	5%	6%	8%	10%	11%	10%	11%	11%	9%	8%	6%	4%	100%	Santa Ynez	
Runoff Calculation																		
		Area (SF)	C-value	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF		
CMU	Finished Compost stockpile	27007	0.10	1006	1092	851	243	52	0	0	0	32	149	338	686	4447		
	Compost windrows	77537	0.10	2888	3134	2442	698	149	0	0	0	90	426	969	1971	12768		
	Asphalt aisles	114127	0.90	38261	41514	32355	9244	1969	0	0	0	1198	5649	12839	26107	169136		
Runoff, Sum				42155	45739	35648	10185	2169	0	0	0	1320	6224	14146	28764	186351		
Compost rainwater absorption																		
		Area (SF)	K-value	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF		
CMU	Finished Compost stockpile	27007	0.90	9054	9824	7656	2188	466	0	0	0	284	1337	3038	6178	40024		
	Compost windrows	77537	0.90	25994	28204	21982	6280	1338	0	0	0	814	3838	8723	17737	114910		
Absorption, Sum				35048	38028	29638	8468	1803	0	0	0	1098	5175	11761	23914	154934		
Water Loss																		
			K-value	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF		
Evapotranspiration	Compost surface	SF	0.70	19133	22321	31888	39859	42251	38265	43845	43845	36671	29496	22321	16741			
Manipulation	Volume			1350	1350	1350	1350	1350	1350	1350	1350	1350	1350	1350	1350			
Heat	Compost weight	lbs	0.20	275	275	275	275	275	275	275	275	275	275	275	275		avg. daily	
Sum				20757	23946	33512	41484	43876	39890	45470	45470	38296	31121	23946	18366	406135	1128	
Net water use				-14291	-17082	1874	33016	42072	39890	45470	45470	37198	25946	12185	-5549	246201	684	
Moisture content of compost at end of month	start at 48%			51%	52%	48%	40%	38%	39%	37%	37%	39%	42%	45%	49%		target range is 40-60%, supplementary water required to maintain 40% min.	
avail tank storage	start of month	Max=	56504	56504	35739	14390	2133	13338	32559	53949	75340	96730	116800	131966	139211			
Added runoff to tank during month				42155	45739	35648	10185	2169	0	0	0	1320	6224	14146	28764	186351		
Water applied to compost from CMU storage				0	3000	2000	0	0	0	0	0	0	0	0	0	5000		
ADF percolate water consumption	160000 gal.	21390	CF	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	21390	256684	
Tank storage end of month				20765	42114	54371	43166	23945	2555	-18836	-40226	-60296	-75462	-82707	-75333			
Storage % full				37%	75%	96%	76%	42%	5%									

Notes:

- 1 Surface area for evapotranspiration is for inclined surface area because that is the surface exposed to wind and sun.
- 2 All other surface areas are plan area surfaces. To use inclined surface for incident rainfall would essentially create extra rainfall depth.
- 3 C-value for compost runoff is same as C-value used in 40-year simulation for consistency.
- 4 K-value for water use constants to distinguish from runoff constant C-value.
- 5 Runoff constants may seem low but these are not single storm event runoff constants.
- 6 ADF percolate consumption added in 2023.
- 7 Negative tank storage means supplementary well water is needed for percolate and/or compost conditioning.

TABLE 6 - 42-YEAR PRECIPITATION SIMULATION

County of Santa Barbara			Area (SF)	C-value	
Daily Rainfall Record - through 09-15-2017	CMU	Finished Compost stockpile	27007	0.10	0.62
		Compost windrows	77537	0.10	1.78
		Asphalt aisles	114127	0.90	
#262 - Gaviota Coast Lat 34-29-20, Long 120-07-52, Elev 425 ft		Average Daily Water Consumption (CF)			0

Daily Rainfall (in inches) recorded as of 8am for the previous 24 hours (PST) Intervention occurs when stored volume exceeds 436,000 gallons.
 Codes: PR = Preliminary data, E = Estimated from nearby gauge Effective rainfall (causing runoff) is 24 hour rainfall minus 0.1 inches

station id	water year	year	month	day	daily rain	code	days since rain	effective rain (in)	effective rain (ft)	Volume (CF)	Water Consumption (CF)	Cumulative Volume (CF)	Cumulative Volume (Gallons)	Intervention	Water Year	Max Vol.	Water Year	Max. Daily Rainfall Depth	25-Year Max. Rainfall depth
262	1974	1973	10	8	0.08			0.00							1974	153076	1974	2.27	6.71
262	1974	1973	10	23	0.45		15	0.35	0.029	3301	0	3301	24690		1975	354826	1975	5.13	6.71
262	1974	1973	11	12	0.20		20	0.10	0.008	943	0	943	7054		1976	129092	1976	1.93	6.71
262	1974	1973	11	16	0.29		4	0.19	0.016	1792	0	1792	13403		1977	164363	1977	2.43	6.71
262	1974	1973	11	25	0.99		9	0.89	0.074	8393	0	8393	62782		1978	228556	1978	3.34	6.71
262	1974	1973	11	27	0.82		2	0.72	0.060	6790	0	6790	50790		1979	150254	1979	2.23	6.71
262	1974	1973	11	28	0.01		1	0.00	0.000	0	0	0	0		1981	136146	1981	2.03	6.71
262	1974	1973	12	1	1.41		1	1.31	0.109	12354	0	12354	92410		1983	319555	1983	4.63	6.71
262	1974	1973	12	13	0.05		12	0.00	0.000	0	0	0	0		1984	122038	1984	1.83	6.71
262	1974	1973	12	21	0.43		8	0.33	0.028	3112	0	3112	23279		1985	189052	1985	2.78	6.71
262	1974	1973	12	27	0.32		6	0.22	0.018	2075	0	2075	15519		1986	165068	1986	2.44	6.71
262	1974	1973	12	31	0.16		4	0.06	0.005	566	0	566	4233		1987	232788	1987	3.40	6.71
262	1974	1974	1	1	0.17		1	0.07	0.006	660	0	660	4938		1988	108635	1988	1.64	6.71
262	1974	1974	1	3	0.42		2	0.32	0.027	3018	0	3018	22573		1989	28217	1989	0.00	6.71
262	1974	1974	1	4	1.28		1	1.18	0.098	11128	0	11128	83239		1990	73364	1990	1.26	6.71
262	1974	1974	1	5	0.21		1	0.11	0.009	1037	0	1037	7760		1991	281462	1991	4.09	6.71
262	1974	1974	1	6	1.69		1	1.59	0.133	14995	0	14995	112162		1992	239843	1992	3.50	6.71
262	1974	1974	1	7	2.27		1	2.17	0.181	20465	0	20465	153076		1993	253951	1993	3.70	6.71
262	1974	1974	1	11	0.15		4	0.05	0.004	472	0	472	3527		1994	129797	1994	1.94	6.71
262	1974	1974	1	12	0.15		1	0.05	0.004	472	0	472	3527		1995	329431	1995	4.77	6.71
262	1974	1974	1	16	0.37		4	0.27	0.023	2546	0	2546	19046		1996	192579	1996	2.83	6.71
262	1974	1974	1	17	0.40		1	0.30	0.025	2829	0	2829	21163		1997	279346	1997	4.06	6.71
262	1974	1974	3	1	0.26		15	0.16	0.013	1509	0	1509	11287		1998	412670	1998	5.95	6.71
262	1974	1974	3	2	1.33		1	1.23	0.103	11600	0	11600	86767		1999	131913	1999	1.97	6.71
262	1974	1974	3	3	0.64		1	0.54	0.045	5093	0	5093	38093		2000	313912	2000	4.55	6.71
262	1974	1974	3	4	0.16		1	0.06	0.005	566	0	566	4233		2001	552343	2001	5.09	6.71
262	1974	1974	3	7	1.01		3	0.91	0.076	8582	0	8582	64193		2002	160130	2002	2.37	6.71
262	1974	1974	3	26	0.15		19	0.05	0.004	472	0	472	3527		2003	373872	2003	5.40	6.71
262	1974	1974	3	27	1.07		1	0.97	0.081	9148	0	9148	68426		2004	341423	2004	4.94	6.71
262	1974	1974	3	28	0.13		1	0.03	0.003	283	0	283	2116		2005	375283	2005	5.42	6.71
262	1974	1974	3	29	0.19		1	0.09	0.008	849	0	849	6349		2006	207393	2006	3.04	6.71
262	1974	1974	3	31	0.40		2	0.30	0.025	2829	0	2829	21163		2007	108635	2007	1.64	6.71
262	1974	1974	4	1	0.15		1	0.05	0.004	472	0	472	3527		2008	187352	2008	2.76	6.71
262	1974	1974	4	2	0.07		1	0.00	0.000	0	0	0	0		2009	145316	2009	2.16	6.71
262	1975	1974	10	28	0.72		56	0.62	0.052	5847	0	5847	43736		2010	301214	2010	4.37	6.71

262	1975	1974	10	29	0.31		1	0.21	0.018	1980	0	1980	14814			2011	236315		2011	3.45	6.71
262	1975	1974	11	21	0.23		23	0.13	0.011	1226	0	1226	9170			2012	122743		2012	1.84	6.71
262	1975	1974	12	3	5.13		13	5.03	0.419	47437	0	47437	354826			2013	100875		2013	1.53	6.71
262	1975	1974	12	4	0.27		1	0.17	0.014	1603	0	1603	11992			2014	114278		2014	1.72	6.71
262	1975	1974	12	27	2.01		23	1.91	0.159	18013	0	18013	134735			2015	171417		2015	1.14	6.71
262	1975	1974	12	28	1.07		1	0.97	0.081	9148	0	9148	68426			2016	139673		2016	2.08	6.71
262	1975	1975	1	31	0.03		34	0.00	0.000	0	0	0	0			2017	189758		2017	2.79	6.71
262	1975	1975	2	1	0.49		1	0.39	0.033	3678	0	3678	27511								
262	1975	1975	2	2	2.76		1	2.66	0.222	25086	0	25086	187642								
262	1975	1975	2	3	0.04		1	0.00	0.000	0	0	0	0								
262	1975	1975	2	4	0.37		1	0.27	0.023	2546	0	2546	19046								
262	1975	1975	2	8	0.34		4	0.24	0.020	2263	0	2263	16930								
262	1975	1975	2	9	0.85		1	0.75	0.063	7073	0	7073	52906								
262	1975	1975	2	10	0.13		1	0.03	0.003	283	0	283	2116								
262	1975	1975	3	5	1.04		26	0.94	0.078	8865	0	8865	66309								
262	1975	1975	3	6	0.40		1	0.30	0.025	2829	0	2829	21163								
262	1975	1975	3	7	1.08		1	0.98	0.082	9242	0	9242	69131								
262	1975	1975	3	8	0.09		1	0.00	0.000	0	0	0	0								
262	1975	1975	3	10	0.75		2	0.65	0.054	6130	0	6130	45852								
262	1975	1975	3	13	0.37		3	0.27	0.023	2546	0	2546	19046								
262	1975	1975	3	16	0.08		3	0.00	0.000	0	0	0	0								
262	1975	1975	3	21	0.17		5	0.07	0.006	660	0	660	4938								
262	1975	1975	3	22	0.93		1	0.83	0.069	7828	0	7828	58550								
262	1975	1975	4	5	0.32		14	0.22	0.018	2075	0	2075	15519								
262	1975	1975	4	6	0.53		1	0.43	0.036	4055	0	4055	30333								
262	1975	1975	4	25	0.09		19	0.00	0.000	0	0	0	0								
262	1976	1975	10	10	0.44		15	0.34	0.028	3206	0	3206	23984								
262	1976	1975	10	11	0.04		1	0.00	0.000	0	0	0	0								
262	1976	1975	10	30	0.13		19	0.03	0.003	283	0	283	2116								
262	1976	1975	11	28	0.36		29	0.26	0.022	2452	0	2452	18341								
262	1976	1975	12	12	0.06		15	0.00	0.000	0	0	0	0								
262	1976	1976	2	4	0.04		23	0.00	0.000	0	0	0	0								
262	1976	1976	2	5	0.56		1	0.46	0.038	4338	0	4338	32449								
262	1976	1976	2	6	0.42		1	0.32	0.027	3018	0	3018	22573								
262	1976	1976	2	7	0.88		1	0.78	0.065	7356	0	7356	55023								
262	1976	1976	2	8	0.97		1	0.87	0.073	8205	0	8205	61371								
262	1976	1976	2	9	1.61		1	1.51	0.126	14240	0	14240	106518								
262	1976	1976	2	10	1.93		1	1.83	0.153	17258	0	17258	129092								
262	1976	1976	2	13	0.03		3	0.00	0.000	0	0	0	0								
262	1976	1976	2	23	0.06		10	0.00	0.000	0	0	0	0								
262	1976	1976	2	24	0.21		1	0.11	0.009	1037	0	1037	7760								
262	1976	1976	2	29	0.21		5	0.11	0.009	1037	0	1037	7760								
262	1976	1976	3	1	1.06		3	0.96	0.080	9054	0	9054	67720								
262	1976	1976	3	2	0.56		1	0.46	0.038	4338	0	4338	32449								
262	1976	1976	3	3	0.08		1	0.00	0.000	0	0	0	0								
262	1976	1976	3	4	0.01		1	0.00	0.000	0	0	0	0								
262	1976	1976	4	12	0.21		39	0.11	0.009	1037	0	1037	7760								
262	1976	1976	4	14	0.16		2	0.06	0.005	566	0	566	4233								
262	1976	1976	4	15	0.58		1	0.48	0.040	4527	0	4527	33860								

262	1977	1976	9	9	0.35		24	0.25	0.021	2358	0	2358	17635
262	1977	1976	9	10	1.21		1	1.11	0.093	10468	0	10468	78302
262	1977	1976	9	11	0.65		1	0.55	0.046	5187	0	5187	38798
262	1977	1976	9	28	1.23		17	1.13	0.094	10657	0	10657	79712
262	1977	1976	9	29	0.33		1	0.23	0.019	2169	0	2169	16225
262	1977	1976	12	30	0.33		32	0.23	0.019	2169	0	2169	16225
262	1977	1976	12	31	0.75		1	0.65	0.054	6130	0	6130	45852
262	1977	1977	1	2	1.57		2	1.47	0.123	13863	0	13863	103697
262	1977	1977	1	3	0.02		1	0.00	0.000	0	0	0	0
262	1977	1977	1	5	0.99		2	0.89	0.074	8393	0	8393	62782
262	1977	1977	1	6	2.43		1	2.33	0.194	21974	0	21974	164363
262	1977	1977	1	7	0.08		1	0.00	0.000	0	0	0	0
262	1977	1977	3	15	0.11		39	0.01	0.001	94	0	94	705
262	1977	1977	3	16	1.10		1	1.00	0.083	9431	0	9431	70542
262	1977	1977	3	24	0.07		8	0.00	0.000	0	0	0	0
262	1977	1977	3	25	0.12		1	0.02	0.002	189	0	189	1411
262	1977	1977	5	7	0.15		13	0.05	0.004	472	0	472	3527
262	1977	1977	5	8	1.66		1	1.56	0.130	14712	0	14712	110045
262	1977	1977	5	10	0.31		2	0.21	0.018	1980	0	1980	14814
262	1978	1977	11	5	0.17		26	0.07	0.006	660	0	660	4938
262	1978	1977	12	21	0.05		47	0.00	0.000	0	0	0	0
262	1978	1977	12	23	0.28		2	0.18	0.015	1698	0	1698	12698
262	1978	1977	12	24	0.04		1	0.00	0.000	0	0	0	0
262	1978	1977	12	25	0.06		1	0.00	0.000	0	0	0	0
262	1978	1977	12	26	0.34		1	0.24	0.020	2263	0	2263	16930
262	1978	1977	12	27	1.93		1	1.83	0.153	17258	0	17258	129092
262	1978	1977	12	28	1.45		1	1.35	0.113	12731	0	12731	95232
262	1978	1978	1	3	0.47		6	0.37	0.031	3489	0	3489	26101
262	1978	1978	1	4	0.33		1	0.23	0.019	2169	0	2169	16225
262	1978	1978	1	5	0.30		1	0.20	0.017	1886	0	1886	14108
262	1978	1978	1	6	0.41		1	0.31	0.026	2924	0	2924	21868
262	1978	1978	1	9	2.19		3	2.09	0.174	19710	0	19710	147433
262	1978	1978	1	10	0.29		1	0.19	0.016	1792	0	1792	13403
262	1978	1978	1	14	1.75		4	1.65	0.138	15561	0	15561	116394
262	1978	1978	1	15	0.05		1	0.00	0.000	0	0	0	0
262	1978	1978	1	16	1.41		1	1.31	0.109	12354	0	12354	92410
262	1978	1978	1	18	0.07		2	0.00	0.000	0	0	0	0
262	1978	1978	1	19	0.17		1	0.07	0.006	660	0	660	4938
262	1978	1978	2	5	0.82		17	0.72	0.060	6790	0	6790	50790
262	1978	1978	2	6	0.07		1	0.00	0.000	0	0	0	0
262	1978	1978	2	7	1.91		1	1.81	0.151	17070	0	17070	127681
262	1978	1978	2	8	2.49		1	2.39	0.199	22539	0	22539	168595
262	1978	1978	2	9	3.34		1	3.24	0.270	30556	0	30556	228556
262	1978	1978	2	10	0.41		1	0.31	0.026	2924	0	2924	21868
262	1978	1978	2	11	0.13		1	0.03	0.003	283	0	283	2116
262	1978	1978	2	12	1.50		1	1.40	0.117	13203	0	13203	98759
262	1978	1978	2	13	0.05		1	0.00	0.000	0	0	0	0
262	1978	1978	3	1	0.12		19	0.02	0.002	189	0	189	1411
262	1978	1978	3	2	1.22		1	1.12	0.093	10562	0	10562	79007

262	1978	1978	3	3	1.09		1	0.99	0.083	9336	0	9336	69837
262	1978	1978	3	4	2.51		1	2.41	0.201	22728	0	22728	170006
262	1978	1978	3	5	0.11		1	0.01	0.001	94	0	94	705
262	1978	1978	3	9	0.63		4	0.53	0.044	4998	0	4998	37387
262	1978	1978	3	21	0.30		12	0.20	0.017	1886	0	1886	14108
262	1978	1978	3	22	1.52		1	1.42	0.118	13392	0	13392	100170
262	1978	1978	3	28	1.27		6	1.17	0.098	11034	0	11034	82534
262	1978	1978	3	29	0.32		1	0.22	0.018	2075	0	2075	15519
262	1978	1978	3	30	1.02		1	0.92	0.077	8676	0	8676	64899
262	1978	1978	3	31	0.39		1	0.29	0.024	2735	0	2735	20457
262	1978	1978	4	4	0.43		4	0.33	0.028	3112	0	3112	23279
262	1978	1978	4	6	0.27		2	0.17	0.014	1603	0	1603	11992
262	1978	1978	4	14	1.54		8	1.44	0.120	13580	0	13580	101580
262	1978	1978	4	25	0.37		11	0.27	0.023	2546	0	2546	19046
262	1978	1978	4	26	0.04		1	0.00	0.000	0	0	0	0
262	1979	1978	9	4	0.41		8	0.31	0.026	2924	0	2924	21868
262	1979	1978	9	5	0.65		1	0.55	0.046	5187	0	5187	38798
262	1979	1978	11	11	0.19		37	0.09	0.008	849	0	849	6349
262	1979	1978	11	14	0.69		3	0.59	0.049	5564	0	5564	41620
262	1979	1978	11	22	1.36		8	1.26	0.105	11883	0	11883	88883
262	1979	1978	11	23	0.70		1	0.60	0.050	5658	0	5658	42325
262	1979	1978	12	17	0.57		25	0.47	0.039	4432	0	4432	33155
262	1979	1978	12	18	0.44		1	0.34	0.028	3206	0	3206	23984
262	1979	1978	12	19	0.18		1	0.08	0.007	754	0	754	5643
262	1979	1979	1	6	2.23		18	2.13	0.178	20087	0	20087	150254
262	1979	1979	1	7	0.05		1	0.00	0.000	0	0	0	0
262	1979	1979	1	8	0.05		1	0.00	0.000	0	0	0	0
262	1979	1979	1	9	0.22		1	0.12	0.010	1132	0	1132	8465
262	1979	1979	1	17	0.42		8	0.32	0.027	3018	0	3018	22573
262	1979	1979	1	18	1.46		1	1.36	0.113	12826	0	12826	95937
262	1979	1979	1	19	0.49		1	0.39	0.033	3678	0	3678	27511
262	1979	1979	1	21	0.49		2	0.39	0.033	3678	0	3678	27511
262	1979	1979	1	29	0.07		8	0.00	0.000	0	0	0	0
262	1979	1979	1	30	0.62		1	0.52	0.043	4904	0	4904	36682
262	1979	1979	1	31	0.94		1	0.84	0.070	7922	0	7922	59255
262	1979	1979	2	1	0.05		1	0.00	0.000	0	0	0	0
262	1979	1979	2	2	0.52		1	0.42	0.035	3961	0	3961	29628
262	1979	1979	2	13	1.17		11	1.07	0.089	10091	0	10091	75480
262	1979	1979	2	14	0.01		1	0.00	0.000	0	0	0	0
262	1979	1979	2	16	0.32		2	0.22	0.018	2075	0	2075	15519
262	1979	1979	2	20	1.82		4	1.72	0.143	16221	0	16221	121332
262	1979	1979	2	21	0.30		1	0.20	0.017	1886	0	1886	14108
262	1979	1979	2	22	0.86		1	0.76	0.063	7167	0	7167	53612
262	1979	1979	3	1	0.68		10	0.58	0.048	5470	0	5470	40914
262	1979	1979	3	16	1.15		15	1.05	0.088	9902	0	9902	74069
262	1979	1979	3	17	0.01		1	0.00	0.000	0	0	0	0
262	1979	1979	3	27	1.65		10	1.55	0.129	14618	0	14618	109340
262	1979	1979	3	28	0.13		1	0.03	0.003	283	0	283	2116
262	1979	1979	3	30	0.44		2	0.34	0.028	3206	0	3206	23984

262	1981	1980	12	4	2.03	E226	5	1.93	0.161	18201	0	18201	136146
262	1981	1980	12	5	0.08	E226	1	0.00	0.000	0	0	0	0
262	1981	1981	1	23	1.23	E226	49	1.13	0.094	10657	0	10657	79712
262	1981	1981	1	28	1.45	E226	5	1.35	0.113	12731	0	12731	95232
262	1981	1981	1	29	0.50	E226	1	0.40	0.033	3772	0	3772	28217
262	1981	1981	2	8	1.26		10	1.16	0.097	10940	0	10940	81829
262	1981	1981	2	9	0.54		1	0.44	0.037	4150	0	4150	31038
262	1981	1981	2	26	1.30		17	1.20	0.100	11317	0	11317	84650
262	1981	1981	2	27	0.04		1	0.00	0.000	0	0	0	0
262	1981	1981	3	1	1.57		5	1.47	0.123	13863	0	13863	103697
262	1981	1981	3	2	0.42		1	0.32	0.027	3018	0	3018	22573
262	1981	1981	3	3	0.05		1	0.00	0.000	0	0	0	0
262	1981	1981	3	4	1.74		1	1.64	0.137	15466	0	15466	115689
262	1981	1981	3	5	1.16		1	1.06	0.088	9997	0	9997	74774
262	1981	1981	3	19	0.75	E	14	0.65	0.054	6130	0	6130	45852
262	1981	1981	3	20	0.32	E	1	0.22	0.018	2075	0	2075	15519
262	1981	1981	3	21	0.27	E	1	0.17	0.014	1603	0	1603	11992
262	1981	1981	3	22	0.45	E	1	0.35	0.029	3301	0	3301	24690
262	1981	1981	4	19	0.55	E226	28	0.45	0.038	4244	0	4244	31744
262	1983	1982	11	9	0.03		20	0.00	0.000	0	0	0	0
262	1983	1982	11	10	0.28		1	0.18	0.015	1698	0	1698	12698
262	1983	1982	11	18	0.48		8	0.38	0.032	3584	0	3584	26806
262	1983	1982	11	19	0.35		1	0.25	0.021	2358	0	2358	17635
262	1983	1982	11	23	0.22		4	0.12	0.010	1132	0	1132	8465
262	1983	1982	11	28	0.20		5	0.10	0.008	943	0	943	7054
262	1983	1982	11	29	1.71		1	1.61	0.134	15183	0	15183	113573
262	1983	1982	11	30	1.07		1	0.97	0.081	9148	0	9148	68426
262	1983	1982	12	1	0.30		2	0.20	0.017	1886	0	1886	14108
262	1983	1983	1	18	1.27		48	1.17	0.098	11034	0	11034	82534
262	1983	1983	1	19	0.01		1	0.00	0.000	0	0	0	0
262	1983	1983	1	21	0.39		2	0.29	0.024	2735	0	2735	20457
262	1983	1983	1	22	4.63		1	4.53	0.378	42721	0	42721	319555
262	1983	1983	1	23	0.33		1	0.23	0.019	2169	0	2169	16225
262	1983	1983	1	24	0.77		1	0.67	0.056	6319	0	6319	47263
262	1983	1983	1	26	0.79		2	0.69	0.058	6507	0	6507	48674
262	1983	1983	1	27	1.12		1	1.02	0.085	9619	0	9619	71953
262	1983	1983	1	28	1.24		1	1.14	0.095	10751	0	10751	80418
262	1983	1983	2	2	0.11		5	0.01	0.001	94	0	94	705
262	1983	1983	2	5	0.36		3	0.26	0.022	2452	0	2452	18341
262	1983	1983	2	6	0.37		1	0.27	0.023	2546	0	2546	19046
262	1983	1983	2	7	0.56		1	0.46	0.038	4338	0	4338	32449
262	1983	1983	2	8	0.14		1	0.04	0.003	377	0	377	2822
262	1983	1983	2	12	1.25		4	1.15	0.096	10845	0	10845	81123
262	1983	1983	2	13	0.03		1	0.00	0.000	0	0	0	0
262	1983	1983	2	23	0.39		10	0.29	0.024	2735	0	2735	20457
262	1983	1983	2	24	0.26		1	0.16	0.013	1509	0	1509	11287
262	1983	1983	2	25	1.79		1	1.69	0.141	15938	0	15938	119216
262	1983	1983	2	26	1.34		1	1.24	0.103	11694	0	11694	87472
262	1983	1983	2	27	2.74		1	2.64	0.220	24897	0	24897	186231

262	1983	1983	2	28	0.33		1	0.23	0.019	2169	0	2169	16225
262	1983	1983	3	1	0.40		4	0.30	0.025	2829	0	2829	21163
262	1983	1983	3	2	1.12		1	1.02	0.085	9619	0	9619	71953
262	1983	1983	3	3	2.66		1	2.56	0.213	24143	0	24143	180587
262	1983	1983	3	4	0.06		1	0.00	0.000	0	0	0	0
262	1983	1983	3	13	0.23		9	0.13	0.011	1226	0	1226	9170
262	1983	1983	3	16	0.51		3	0.41	0.034	3867	0	3867	28922
262	1983	1983	3	17	0.04		1	0.00	0.000	0	0	0	0
262	1983	1983	3	18	0.28		1	0.18	0.015	1698	0	1698	12698
262	1983	1983	3	20	0.71		2	0.61	0.051	5753	0	5753	43031
262	1983	1983	3	21	0.06		1	0.00	0.000	0	0	0	0
262	1983	1983	3	22	0.41		1	0.31	0.026	2924	0	2924	21868
262	1983	1983	3	23	0.67		1	0.57	0.048	5376	0	5376	40209
262	1983	1983	3	24	0.42		1	0.32	0.027	3018	0	3018	22573
262	1983	1983	3	25	0.01		1	0.00	0.000	0	0	0	0
262	1983	1983	3	27	0.22		2	0.12	0.010	1132	0	1132	8465
262	1983	1983	4	17	0.81		21	0.71	0.059	6696	0	6696	50085
262	1983	1983	4	18	0.64		1	0.54	0.045	5093	0	5093	38093
262	1983	1983	4	19	1.01		1	0.91	0.076	8582	0	8582	64193
262	1983	1983	4	20	0.76		1	0.66	0.055	6224	0	6224	46558
262	1983	1983	4	21	0.05		1	0.00	0.000	0	0	0	0
262	1983	1983	4	22	0.08		1	0.00	0.000	0	0	0	0
262	1983	1983	4	23	0.01		1	0.00	0.000	0	0	0	0
262	1983	1983	4	28	0.43		5	0.33	0.028	3112	0	3112	23279
262	1983	1983	4	29	0.04		1	0.00	0.000	0	0	0	0
262	1984	1983	9	29	0.30	E	30	0.20	0.017	1886	0	1886	14108
262	1984	1983	9	30	1.83	E	1	1.73	0.144	16315	0	16315	122038
262	1984	1983	10	1	0.68		2	0.58	0.048	5470	0	5470	40914
262	1984	1983	11	10	0.01		40	0.00	0.000	0	0	0	0
262	1984	1983	11	11	1.69		1	1.59	0.133	14995	0	14995	112162
262	1984	1983	11	12	0.12		1	0.02	0.002	189	0	189	1411
262	1984	1983	11	20	0.14		8	0.04	0.003	377	0	377	2822
262	1984	1983	11	21	0.22		1	0.12	0.010	1132	0	1132	8465
262	1984	1983	11	22	0.01		1	0.00	0.000	0	0	0	0
262	1984	1983	11	24	1.27		2	1.17	0.098	11034	0	11034	82534
262	1984	1983	12	9	1.00		16	0.90	0.075	8488	0	8488	63488
262	1984	1983	12	10	0.22		1	0.12	0.010	1132	0	1132	8465
262	1984	1983	12	24	1.35		14	1.25	0.104	11788	0	11788	88177
262	1984	1983	12	25	1.25		1	1.15	0.096	10845	0	10845	81123
262	1985	1984	11	12	0.34		18	0.24	0.020	2263	0	2263	16930
262	1985	1984	11	13	0.06		1	0.00	0.000	0	0	0	0
262	1985	1984	11	23	0.01		10	0.00	0.000	0	0	0	0
262	1985	1984	11	24	0.93		1	0.83	0.069	7828	0	7828	58550
262	1985	1984	11	27	0.17		3	0.07	0.006	660	0	660	4938
262	1985	1984	11	28	0.17		1	0.07	0.006	660	0	660	4938
262	1985	1984	12	2	0.14		5	0.04	0.003	377	0	377	2822
262	1985	1984	12	3	0.05		1	0.00	0.000	0	0	0	0
262	1985	1984	12	7	1.35		4	1.25	0.104	11788	0	11788	88177
262	1985	1984	12	8	0.05		1	0.00	0.000	0	0	0	0

262	1985	1984	12	10	0.79		2	0.69	0.058	6507	0	6507	48674
262	1985	1984	12	15	0.77		5	0.67	0.056	6319	0	6319	47263
262	1985	1984	12	19	1.38		4	1.28	0.107	12071	0	12071	90294
262	1985	1985	1	9	0.54		21	0.44	0.037	4150	0	4150	31038
262	1985	1985	1	10	0.22		1	0.12	0.010	1132	0	1132	8465
262	1985	1985	2	8	2.78		29	2.68	0.223	25274	0	25274	189052
262	1985	1985	2	9	0.03		1	0.00	0.000	0	0	0	0
262	1985	1985	3	6	0.01		28	0.00	0.000	0	0	0	0
262	1985	1985	3	7	0.47		1	0.37	0.031	3489	0	3489	26101
262	1986	1985	11	24	2.20		48	2.10	0.175	19805	0	19805	148138
262	1986	1985	11	25	1.17		1	1.07	0.089	10091	0	10091	75480
262	1986	1985	11	29	0.91	E	4	0.81	0.068	7639	0	7639	57139
262	1986	1985	11	30	0.80		1	0.70	0.058	6602	0	6602	49379
262	1986	1985	12	1	0.03		2	0.00	0.000	0	0	0	0
262	1986	1985	12	2	1.76	E	1	1.66	0.138	15655	0	15655	117100
262	1986	1986	1	3	0.07		32	0.00	0.000	0	0	0	0
262	1986	1986	1	4	0.75		1	0.65	0.054	6130	0	6130	45852
262	1986	1986	1	5	0.28		1	0.18	0.015	1698	0	1698	12698
262	1986	1986	1	29	0.69		24	0.59	0.049	5564	0	5564	41620
262	1986	1986	1	30	0.25		1	0.15	0.013	1415	0	1415	10581
262	1986	1986	1	31	0.62		1	0.52	0.043	4904	0	4904	36682
262	1986	1986	2	11	0.11		11	0.01	0.001	94	0	94	705
262	1986	1986	2	12	2.44		1	2.34	0.195	22068	0	22068	165068
262	1986	1986	2	13	2.15		1	2.05	0.171	19333	0	19333	144611
262	1986	1986	2	14	1.76		1	1.66	0.138	15655	0	15655	117100
262	1986	1986	2	15	0.05		1	0.00	0.000	0	0	0	0
262	1986	1986	2	16	0.12		1	0.02	0.002	189	0	189	1411
262	1986	1986	2	17	0.33		1	0.23	0.019	2169	0	2169	16225
262	1986	1986	2	18	0.40		1	0.30	0.025	2829	0	2829	21163
262	1986	1986	2	19	0.58		1	0.48	0.040	4527	0	4527	33860
262	1986	1986	3	7	0.07		19	0.00	0.000	0	0	0	0
262	1986	1986	3	8	2.15		1	2.05	0.171	19333	0	19333	144611
262	1986	1986	3	9	0.62		1	0.52	0.043	4904	0	4904	36682
262	1986	1986	3	10	1.68		1	1.58	0.132	14901	0	14901	111456
262	1986	1986	3	11	0.05		1	0.00	0.000	0	0	0	0
262	1986	1986	3	12	0.20		1	0.10	0.008	943	0	943	7054
262	1986	1986	3	14	0.52		2	0.42	0.035	3961	0	3961	29628
262	1987	1986	9	21	0.12		38	0.02	0.002	189	0	189	1411
262	1987	1986	9	22	0.13		1	0.03	0.003	283	0	283	2116
262	1987	1986	9	23	0.07		1	0.00	0.000	0	0	0	0
262	1987	1986	9	24	1.38		1	1.28	0.107	12071	0	12071	90294
262	1987	1986	12	5	0.18	E	12	0.08	0.007	754	0	754	5643
262	1987	1986	12	6	0.25	E	1	0.15	0.013	1415	0	1415	10581
262	1987	1987	1	3	0.46		28	0.36	0.030	3395	0	3395	25395
262	1987	1987	1	4	0.79		1	0.69	0.058	6507	0	6507	48674
262	1987	1987	1	5	0.12		1	0.02	0.002	189	0	189	1411
262	1987	1987	1	6	0.98		1	0.88	0.073	8299	0	8299	62077
262	1987	1987	1	7	0.03		1	0.00	0.000	0	0	0	0
262	1987	1987	2	8	0.05		32	0.00	0.000	0	0	0	0

262	1987	1987	2	9	0.42		1	0.32	0.027	3018	0	3018	22573
262	1987	1987	2	10	2.02		1	1.92	0.160	18107	0	18107	135441
262	1987	1987	2	13	1.83		3	1.73	0.144	16315	0	16315	122038
262	1987	1987	2	15	0.14		2	0.04	0.003	377	0	377	2822
262	1987	1987	2	22	0.45		7	0.35	0.029	3301	0	3301	24690
262	1987	1987	2	23	0.16		1	0.06	0.005	566	0	566	4233
262	1987	1987	2	24	0.14		1	0.04	0.003	377	0	377	2822
262	1987	1987	2	25	0.24		1	0.14	0.012	1320	0	1320	9876
262	1987	1987	3	4	0.26		10	0.16	0.013	1509	0	1509	11287
262	1987	1987	3	5	3.40		1	3.30	0.275	31121	0	31121	232788
262	1987	1987	3	6	2.19		1	2.09	0.174	19710	0	19710	147433
262	1987	1987	3	13	0.14		7	0.04	0.003	377	0	377	2822
262	1987	1987	3	21	0.73		8	0.63	0.053	5941	0	5941	44441
262	1988	1987	9	7	0.01		17	0.00	0.000	0	0	0	0
262	1988	1987	9	20	0.01		13	0.00	0.000	0	0	0	0
262	1988	1987	9	27	0.01		7	0.00	0.000	0	0	0	0
262	1988	1987	9	28	0.01		1	0.00	0.000	0	0	0	0
262	1988	1987	10	22	1.47		25	1.37	0.114	12920	0	12920	96642
262	1988	1987	10	23	0.17		1	0.07	0.006	660	0	660	4938
262	1988	1987	10	24	0.06		1	0.00	0.000	0	0	0	0
262	1988	1987	10	29	0.73		5	0.63	0.053	5941	0	5941	44441
262	1988	1987	10	31	0.24		2	0.14	0.012	1320	0	1320	9876
262	1988	1987	11	4	0.03		4	0.00	0.000	0	0	0	0
262	1988	1987	11	5	0.12		1	0.02	0.002	189	0	189	1411
262	1988	1987	11	17	0.14		12	0.04	0.003	377	0	377	2822
262	1988	1987	12	4	0.71		18	0.61	0.051	5753	0	5753	43031
262	1988	1987	12	6	0.44		2	0.34	0.028	3206	0	3206	23984
262	1988	1987	12	16	1.40		10	1.30	0.108	12260	0	12260	91705
262	1988	1987	12	27	0.36		11	0.26	0.022	2452	0	2452	18341
262	1988	1987	12	28	0.82		1	0.72	0.060	6790	0	6790	50790
262	1988	1988	1	4	0.86		7	0.76	0.063	7167	0	7167	53612
262	1988	1988	1	5	0.67		1	0.57	0.048	5376	0	5376	40209
262	1988	1988	1	16	0.02		11	0.00	0.000	0	0	0	0
262	1988	1988	1	17	1.37		1	1.27	0.106	11977	0	11977	89588
262	1988	1988	2	26	0.59		40	0.49	0.041	4621	0	4621	34566
262	1988	1988	2	27	0.03		1	0.00	0.000	0	0	0	0
262	1988	1988	2	28	1.58		1	1.48	0.123	13957	0	13957	104402
262	1988	1988	4	14	0.34		17	0.24	0.020	2263	0	2263	16930
262	1988	1988	4	19	1.64		5	1.54	0.128	14523	0	14523	108635
262	1988	1988	4	20	0.46		1	0.36	0.030	3395	0	3395	25395
262	1988	1988	4	23	0.44		3	0.34	0.028	3206	0	3206	23984
262	1990	1989	9	29	0.12	E226	36	0.02	0.002	189	0	189	1411
262	1990	1989	10	22	0.50	E226	24	0.40	0.033	3772	0	3772	28217
262	1990	1989	10	24	0.25	E226	2	0.15	0.013	1415	0	1415	10581
262	1990	1989	11	26	0.25	E226	33	0.15	0.013	1415	0	1415	10581
262	1990	1990	1	1	0.05		6	0.00	0.000	0	0	0	0
262	1990	1990	1	2	0.20		1	0.10	0.008	943	0	943	7054
262	1990	1990	1	12	1.13		10	1.03	0.086	9714	0	9714	72658
262	1990	1990	1	13	0.44		1	0.34	0.028	3206	0	3206	23984

262	1990	1990	1	14	0.77		1	0.67	0.056	6319	0	6319	47263
262	1990	1990	1	15	0.10		1	0.00	0.000	0	0	0	0
262	1990	1990	1	16	0.23		1	0.13	0.011	1226	0	1226	9170
262	1990	1990	1	17	0.10		1	0.00	0.000	0	0	0	0
262	1990	1990	2	3	0.02		17	0.00	0.000	0	0	0	0
262	1990	1990	2	4	0.49		1	0.39	0.033	3678	0	3678	27511
262	1990	1990	2	16	1.14		12	1.04	0.087	9808	0	9808	73364
262	1990	1990	2	17	0.26		1	0.16	0.013	1509	0	1509	11287
262	1990	1990	2	18	0.02		1	0.00	0.000	0	0	0	0
262	1990	1990	3	13	0.05	E226	26	0.00	0.000	0	0	0	0
262	1990	1990	4	17	0.35	E226	35	0.25	0.021	2358	0	2358	17635
262	1990	1990	5	27	0.75		40	0.65	0.054	6130	0	6130	45852
262	1991	1990	12	19	0.24		23	0.14	0.012	1320	0	1320	9876
262	1991	1990	12	20	0.29		1	0.19	0.016	1792	0	1792	13403
262	1991	1991	1	3	0.18		14	0.08	0.007	754	0	754	5643
262	1991	1991	1	4	0.80		1	0.70	0.058	6602	0	6602	49379
262	1991	1991	1	5	0.08		1	0.00	0.000	0	0	0	0
262	1991	1991	1	10	0.51		5	0.41	0.034	3867	0	3867	28922
262	1991	1991	2	26	0.44		47	0.34	0.028	3206	0	3206	23984
262	1991	1991	2	27	2.82		1	2.72	0.227	25652	0	25652	191874
262	1991	1991	2	28	1.70		1	1.60	0.133	15089	0	15089	112867
262	1991	1991	3	1	0.16		4	0.06	0.005	566	0	566	4233
262	1991	1991	3	4	0.71		3	0.61	0.051	5753	0	5753	43031
262	1991	1991	3	14	0.17		10	0.07	0.006	660	0	660	4938
262	1991	1991	3	17	1.97		3	1.87	0.156	17635	0	17635	131913
262	1991	1991	3	18	4.09		1	3.99	0.333	37629	0	37629	281462
262	1991	1991	3	19	0.09		1	0.00	0.000	0	0	0	0
262	1991	1991	3	20	0.97		1	0.87	0.073	8205	0	8205	61371
262	1991	1991	3	24	0.77		4	0.67	0.056	6319	0	6319	47263
262	1991	1991	3	25	0.37		1	0.27	0.023	2546	0	2546	19046
262	1991	1991	3	26	0.80		1	0.70	0.058	6602	0	6602	49379
262	1991	1991	3	27	0.03		1	0.00	0.000	0	0	0	0
262	1992	1991	10	26	0.30		30	0.20	0.017	1886	0	1886	14108
262	1992	1991	12	27	1.46		32	1.36	0.113	12826	0	12826	95937
262	1992	1991	12	28	0.56		1	0.46	0.038	4338	0	4338	32449
262	1992	1991	12	29	1.35		1	1.25	0.104	11788	0	11788	88177
262	1992	1991	12	30	0.09		1	0.00	0.000	0	0	0	0
262	1992	1992	1	3	0.33		4	0.23	0.019	2169	0	2169	16225
262	1992	1992	1	5	1.97		2	1.87	0.156	17635	0	17635	131913
262	1992	1992	1	7	0.23		2	0.13	0.011	1226	0	1226	9170
262	1992	1992	2	6	0.62		30	0.52	0.043	4904	0	4904	36682
262	1992	1992	2	9	0.77		3	0.67	0.056	6319	0	6319	47263
262	1992	1992	2	10	1.19		1	1.09	0.091	10280	0	10280	76891
262	1992	1992	2	11	0.10		1	0.00	0.000	0	0	0	0
262	1992	1992	2	12	3.50		1	3.40	0.283	32065	0	32065	239843
262	1992	1992	2	13	0.28		1	0.18	0.015	1698	0	1698	12698
262	1992	1992	2	14	0.03		1	0.00	0.000	0	0	0	0
262	1992	1992	2	15	1.53		1	1.43	0.119	13486	0	13486	100875
262	1992	1992	3	2	0.51		18	0.41	0.034	3867	0	3867	28922

262	1992	1992	3	5	1.20		3	1.10	0.092	10374	0	10374	77596
262	1992	1992	3	6	0.57		1	0.47	0.039	4432	0	4432	33155
262	1992	1992	3	7	0.15		1	0.05	0.004	472	0	472	3527
262	1992	1992	3	19	0.02		12	0.00	0.000	0	0	0	0
262	1992	1992	3	20	0.76		1	0.66	0.055	6224	0	6224	46558
262	1992	1992	3	21	0.11		1	0.01	0.001	94	0	94	705
262	1992	1992	3	22	1.29		1	1.19	0.099	11223	0	11223	83945
262	1992	1992	3	23	0.38		1	0.28	0.023	2641	0	2641	19752
262	1993	1992	10	29	0.13		37	0.03	0.003	283	0	283	2116
262	1993	1992	10	30	0.67		1	0.57	0.048	5376	0	5376	40209
262	1993	1992	12	3	0.13		4	0.03	0.003	283	0	283	2116
262	1993	1992	12	6	1.44		3	1.34	0.112	12637	0	12637	94526
262	1993	1992	12	7	1.07		1	0.97	0.081	9148	0	9148	68426
262	1993	1992	12	10	0.02		3	0.00	0.000	0	0	0	0
262	1993	1992	12	11	0.41		1	0.31	0.026	2924	0	2924	21868
262	1993	1992	12	17	0.23		6	0.13	0.011	1226	0	1226	9170
262	1993	1992	12	18	0.03		1	0.00	0.000	0	0	0	0
262	1993	1992	12	19	0.10		1	0.00	0.000	0	0	0	0
262	1993	1992	12	28	0.85		9	0.75	0.063	7073	0	7073	52906
262	1993	1992	12	29	0.34		1	0.24	0.020	2263	0	2263	16930
262	1993	1992	12	30	0.01		1	0.00	0.000	0	0	0	0
262	1993	1993	1	1	0.36		2	0.26	0.022	2452	0	2452	18341
262	1993	1993	1	6	3.15		5	3.05	0.254	28764	0	28764	215153
262	1993	1993	1	7	0.79		1	0.69	0.058	6507	0	6507	48674
262	1993	1993	1	10	0.37		3	0.27	0.023	2546	0	2546	19046
262	1993	1993	1	12	0.87		2	0.77	0.064	7262	0	7262	54317
262	1993	1993	1	13	1.18		1	1.08	0.090	10185	0	10185	76185
262	1993	1993	1	14	0.11		1	0.01	0.001	94	0	94	705
262	1993	1993	1	15	1.37		1	1.27	0.106	11977	0	11977	89588
262	1993	1993	1	16	1.60		1	1.50	0.125	14146	0	14146	105813
262	1993	1993	1	17	0.89		1	0.79	0.066	7450	0	7450	55728
262	1993	1993	1	18	1.23		1	1.13	0.094	10657	0	10657	79712
262	1993	1993	2	8	2.35		21	2.25	0.188	21219	0	21219	158719
262	1993	1993	2	9	0.43		1	0.33	0.028	3112	0	3112	23279
262	1993	1993	2	19	1.47		10	1.37	0.114	12920	0	12920	96642
262	1993	1993	2	20	0.11		1	0.01	0.001	94	0	94	705
262	1993	1993	2	21	0.02		1	0.00	0.000	0	0	0	0
262	1993	1993	2	22	1.10		1	1.00	0.083	9431	0	9431	70542
262	1993	1993	2	23	1.74		1	1.64	0.137	15466	0	15466	115689
262	1993	1993	2	25	0.74		2	0.64	0.053	6036	0	6036	45147
262	1993	1993	2	26	0.83		1	0.73	0.061	6884	0	6884	51496
262	1993	1993	3	24	0.27		29	0.17	0.014	1603	0	1603	11992
262	1993	1993	3	25	3.70		1	3.60	0.300	33951	0	33951	253951
262	1993	1993	3	26	0.20		1	0.10	0.008	943	0	943	7054
262	1993	1993	3	27	1.19		1	1.09	0.091	10280	0	10280	76891
262	1994	1993	11	10	0.25		14	0.15	0.013	1415	0	1415	10581
262	1994	1993	11	11	0.08		1	0.00	0.000	0	0	0	0
262	1994	1993	11	29	0.72		18	0.62	0.052	5847	0	5847	43736
262	1994	1993	12	11	1.41		13	1.31	0.109	12354	0	12354	92410

262	1994	1993	12	13	0.64		2	0.54	0.045	5093	0	5093	38093
262	1994	1993	12	14	0.04		1	0.00	0.000	0	0	0	0
262	1994	1994	1	23	0.47		40	0.37	0.031	3489	0	3489	26101
262	1994	1994	1	24	1.17		1	1.07	0.089	10091	0	10091	75480
262	1994	1994	1	25	0.05		1	0.00	0.000	0	0	0	0
262	1994	1994	2	3	0.61		9	0.51	0.043	4810	0	4810	35976
262	1994	1994	2	4	0.15		1	0.05	0.004	472	0	472	3527
262	1994	1994	2	6	0.41		2	0.31	0.026	2924	0	2924	21868
262	1994	1994	2	7	1.94		1	1.84	0.153	17353	0	17353	129797
262	1994	1994	2	8	0.03		1	0.00	0.000	0	0	0	0
262	1994	1994	2	16	0.04		8	0.00	0.000	0	0	0	0
262	1994	1994	2	17	1.87		1	1.77	0.148	16692	0	16692	124859
262	1994	1994	2	18	0.11		1	0.01	0.001	94	0	94	705
262	1994	1994	2	19	1.41		1	1.31	0.109	12354	0	12354	92410
262	1994	1994	2	20	0.29		1	0.19	0.016	1792	0	1792	13403
262	1994	1994	3	6	0.19	E	17	0.09	0.008	849	0	849	6349
262	1994	1994	3	7	0.52	E	1	0.42	0.035	3961	0	3961	29628
262	1994	1994	3	19	0.42		12	0.32	0.027	3018	0	3018	22573
262	1994	1994	3	24	1.14		5	1.04	0.087	9808	0	9808	73364
262	1994	1994	4	25	0.50	E	32	0.40	0.033	3772	0	3772	28217
262	1994	1994	5	7	0.10	E	12	0.00	0.000	0	0	0	0
262	1994	1994	5	17	0.14		10	0.04	0.003	377	0	377	2822
262	1994	1994	5	18	0.11		1	0.01	0.001	94	0	94	705
262	1995	1994	9	23	0.05		36	0.00	0.000	0	0	0	0
262	1995	1994	10	3	0.07		11	0.00	0.000	0	0	0	0
262	1995	1994	10	4	0.40		1	0.30	0.025	2829	0	2829	21163
262	1995	1994	11	7	0.31		34	0.21	0.018	1980	0	1980	14814
262	1995	1994	11	8	0.01		1	0.00	0.000	0	0	0	0
262	1995	1994	11	15	0.35		7	0.25	0.021	2358	0	2358	17635
262	1995	1994	11	16	0.60		1	0.50	0.042	4715	0	4715	35271
262	1995	1994	12	20	0.32		35	0.22	0.018	2075	0	2075	15519
262	1995	1994	12	24	0.50		4	0.40	0.033	3772	0	3772	28217
262	1995	1995	1	2	0.05		9	0.00	0.000	0	0	0	0
262	1995	1995	1	3	1.16		1	1.06	0.088	9997	0	9997	74774
262	1995	1995	1	4	4.24		1	4.14	0.345	39043	0	39043	292044
262	1995	1995	1	5	0.01		1	0.00	0.000	0	0	0	0
262	1995	1995	1	7	1.64		2	1.54	0.128	14523	0	14523	108635
262	1995	1995	1	8	0.82		1	0.72	0.060	6790	0	6790	50790
262	1995	1995	1	9	1.61		1	1.51	0.126	14240	0	14240	106518
262	1995	1995	1	10	4.77		1	4.67	0.389	44042	0	44042	329431
262	1995	1995	1	11	0.12		1	0.02	0.002	189	0	189	1411
262	1995	1995	1	12	0.52		1	0.42	0.035	3961	0	3961	29628
262	1995	1995	1	14	0.88		2	0.78	0.065	7356	0	7356	55023
262	1995	1995	1	15	0.13		1	0.03	0.003	283	0	283	2116
262	1995	1995	1	16	0.18		1	0.08	0.007	754	0	754	5643
262	1995	1995	1	20	0.58		4	0.48	0.040	4527	0	4527	33860
262	1995	1995	1	21	0.05		1	0.00	0.000	0	0	0	0
262	1995	1995	1	22	0.53		1	0.43	0.036	4055	0	4055	30333
262	1995	1995	1	23	2.02		1	1.92	0.160	18107	0	18107	135441

262	1995	1995	1	24	2.31		1	2.21	0.184	20842	0	20842	155898
262	1995	1995	1	25	1.41		1	1.31	0.109	12354	0	12354	92410
262	1995	1995	2	8	0.70		14	0.60	0.050	5658	0	5658	42325
262	1995	1995	2	9	0.11		1	0.01	0.001	94	0	94	705
262	1995	1995	2	13	0.89		4	0.79	0.066	7450	0	7450	55728
262	1995	1995	2	14	0.50		1	0.40	0.033	3772	0	3772	28217
262	1995	1995	3	1	0.07		18	0.00	0.000	0	0	0	0
262	1995	1995	3	2	0.61		1	0.51	0.043	4810	0	4810	35976
262	1995	1995	3	3	0.12		1	0.02	0.002	189	0	189	1411
262	1995	1995	3	4	0.60		1	0.50	0.042	4715	0	4715	35271
262	1995	1995	3	5	2.10		1	2.00	0.167	18861	0	18861	141084
262	1995	1995	3	9	0.11		4	0.01	0.001	94	0	94	705
262	1995	1995	3	10	4.39		1	4.29	0.358	40458	0	40458	302625
262	1995	1995	3	11	1.43		1	1.33	0.111	12543	0	12543	93821
262	1995	1995	3	20	0.63		9	0.53	0.044	4998	0	4998	37387
262	1995	1995	3	21	0.11		1	0.01	0.001	94	0	94	705
262	1995	1995	3	22	1.56		1	1.46	0.122	13769	0	13769	102991
262	1995	1995	3	23	0.35		1	0.25	0.021	2358	0	2358	17635
262	1995	1995	4	16	0.32		24	0.22	0.018	2075	0	2075	15519
262	1995	1995	4	17	0.01		1	0.00	0.000	0	0	0	0
262	1995	1995	4	18	0.06		1	0.00	0.000	0	0	0	0
262	1995	1995	5	15	0.09		27	0.00	0.000	0	0	0	0
262	1995	1995	5	16	0.97		1	0.87	0.073	8205	0	8205	61371
262	1995	1995	6	2	0.03		17	0.00	0.000	0	0	0	0
262	1995	1995	6	15	0.50		13	0.40	0.033	3772	0	3772	28217
262	1995	1995	6	16	0.54		1	0.44	0.037	4150	0	4150	31038
262	1996	1995	11	1	0.22	E329	16	0.12	0.010	1132	0	1132	8465
262	1996	1995	12	12	1.22		42	1.12	0.093	10562	0	10562	79007
262	1996	1995	12	13	0.41		1	0.31	0.026	2924	0	2924	21868
262	1996	1995	12	23	0.39		10	0.29	0.024	2735	0	2735	20457
262	1996	1995	12	24	0.29		1	0.19	0.016	1792	0	1792	13403
262	1996	1996	1	16	0.33		23	0.23	0.019	2169	0	2169	16225
262	1996	1996	1	19	0.13		3	0.03	0.003	283	0	283	2116
262	1996	1996	1	20	0.16		1	0.06	0.005	566	0	566	4233
262	1996	1996	1	21	0.16		1	0.06	0.005	566	0	566	4233
262	1996	1996	1	22	0.18		1	0.08	0.007	754	0	754	5643
262	1996	1996	1	24	0.02		2	0.00	0.000	0	0	0	0
262	1996	1996	1	25	0.29		1	0.19	0.016	1792	0	1792	13403
262	1996	1996	1	27	0.21		2	0.11	0.009	1037	0	1037	7760
262	1996	1996	1	30	0.24		3	0.14	0.012	1320	0	1320	9876
262	1996	1996	1	31	1.40		1	1.30	0.108	12260	0	12260	91705
262	1996	1996	2	2	0.04		2	0.00	0.000	0	0	0	0
262	1996	1996	2	3	1.02		1	0.92	0.077	8676	0	8676	64899
262	1996	1996	2	5	0.50		2	0.40	0.033	3772	0	3772	28217
262	1996	1996	2	15	0.10		10	0.00	0.000	0	0	0	0
262	1996	1996	2	19	2.83		4	2.73	0.228	25746	0	25746	192579
262	1996	1996	2	20	1.67		1	1.57	0.131	14806	0	14806	110751
262	1996	1996	2	21	0.30		1	0.20	0.017	1886	0	1886	14108
262	1996	1996	2	25	0.40		4	0.30	0.025	2829	0	2829	21163

262	1996	1996	2	26	0.26		1	0.16	0.013	1509	0	1509	11287
262	1996	1996	2	27	0.44		1	0.34	0.028	3206	0	3206	23984
262	1996	1996	3	3	0.01		7	0.00	0.000	0	0	0	0
262	1996	1996	3	4	0.81		1	0.71	0.059	6696	0	6696	50085
262	1996	1996	3	12	1.15		8	1.05	0.088	9902	0	9902	74069
262	1996	1996	4	1	0.50		20	0.40	0.033	3772	0	3772	28217
262	1996	1996	4	16	0.06		15	0.00	0.000	0	0	0	0
262	1996	1996	4	17	0.19		1	0.09	0.008	849	0	849	6349
262	1996	1996	4	18	0.16		1	0.06	0.005	566	0	566	4233
262	1996	1996	5	16	1.09		28	0.99	0.083	9336	0	9336	69837
262	1997	1996	10	30	2.95		45	2.85	0.238	26878	0	26878	201045
262	1997	1996	11	21	0.98		22	0.88	0.073	8299	0	8299	62077
262	1997	1996	11	23	2.63		2	2.53	0.211	23860	0	23860	178471
262	1997	1996	12	9	0.09		17	0.00	0.000	0	0	0	0
262	1997	1996	12	10	1.48		1	1.38	0.115	13014	0	13014	97348
262	1997	1996	12	11	4.06		1	3.96	0.330	37346	0	37346	279346
262	1997	1996	12	12	0.21		1	0.11	0.009	1037	0	1037	7760
262	1997	1996	12	22	0.53		10	0.43	0.036	4055	0	4055	30333
262	1997	1996	12	27	0.38		5	0.28	0.023	2641	0	2641	19752
262	1997	1996	12	28	0.27		1	0.17	0.014	1603	0	1603	11992
262	1997	1996	12	30	0.03		2	0.00	0.000	0	0	0	0
262	1997	1996	12	31	0.26		1	0.16	0.013	1509	0	1509	11287
262	1997	1997	1	1	0.11		1	0.01	0.001	94	0	94	705
262	1997	1997	1	2	0.99		1	0.89	0.074	8393	0	8393	62782
262	1997	1997	1	3	0.95		1	0.85	0.071	8016	0	8016	59961
262	1997	1997	1	13	0.38		10	0.28	0.023	2641	0	2641	19752
262	1997	1997	1	15	0.76		2	0.66	0.055	6224	0	6224	46558
262	1997	1997	1	20	0.17		5	0.07	0.006	660	0	660	4938
262	1997	1997	1	21	0.09		1	0.00	0.000	0	0	0	0
262	1997	1997	1	22	0.32		1	0.22	0.018	2075	0	2075	15519
262	1997	1997	1	23	1.68		1	1.58	0.132	14901	0	14901	111456
262	1997	1997	1	25	0.18		2	0.08	0.007	754	0	754	5643
262	1997	1997	1	26	1.39		1	1.29	0.108	12166	0	12166	90999
262	1997	1997	1	27	0.19		1	0.09	0.008	849	0	849	6349
262	1998	1997	11	11	0.65		15	0.55	0.046	5187	0	5187	38798
262	1998	1997	11	13	0.12		2	0.02	0.002	189	0	189	1411
262	1998	1997	11	14	0.20		1	0.10	0.008	943	0	943	7054
262	1998	1997	11	16	0.50		2	0.40	0.033	3772	0	3772	28217
262	1998	1997	11	20	0.10		4	0.00	0.000	0	0	0	0
262	1998	1997	11	26	0.55		6	0.45	0.038	4244	0	4244	31744
262	1998	1997	11	27	0.25		1	0.15	0.013	1415	0	1415	10581
262	1998	1997	11	30	0.45		3	0.35	0.029	3301	0	3301	24690
262	1998	1997	12	1	0.05		2	0.00	0.000	0	0	0	0
262	1998	1997	12	5	1.85		4	1.75	0.146	16504	0	16504	123448
262	1998	1997	12	6	4.10		1	4.00	0.333	37723	0	37723	282168
262	1998	1997	12	8	0.52		2	0.42	0.035	3961	0	3961	29628
262	1998	1997	12	15	0.03		7	0.00	0.000	0	0	0	0
262	1998	1997	12	18	0.18		3	0.08	0.007	754	0	754	5643
262	1998	1997	12	19	1.22		1	1.12	0.093	10562	0	10562	79007

262	1998	1998	1	4	0.20		16	0.10	0.008	943	0	943	7054
262	1998	1998	1	5	0.15		1	0.05	0.004	472	0	472	3527
262	1998	1998	1	6	0.60		1	0.50	0.042	4715	0	4715	35271
262	1998	1998	1	10	2.50		4	2.40	0.200	22634	0	22634	169301
262	1998	1998	1	13	0.12		3	0.02	0.002	189	0	189	1411
262	1998	1998	1	15	0.24		2	0.14	0.012	1320	0	1320	9876
262	1998	1998	1	19	0.32		4	0.22	0.018	2075	0	2075	15519
262	1998	1998	1	29	0.82		10	0.72	0.060	6790	0	6790	50790
262	1998	1998	1	30	0.11		1	0.01	0.001	94	0	94	705
262	1998	1998	1	31	0.09		1	0.00	0.000	0	0	0	0
262	1998	1998	2	2	5.95		2	5.85	0.488	55170	0	55170	412670
262	1998	1998	2	3	1.88		1	1.78	0.148	16787	0	16787	125565
262	1998	1998	2	4	0.27		1	0.17	0.014	1603	0	1603	11992
262	1998	1998	2	6	1.56		2	1.46	0.122	13769	0	13769	102991
262	1998	1998	2	7	0.33		1	0.23	0.019	2169	0	2169	16225
262	1998	1998	2	8	1.86		1	1.76	0.147	16598	0	16598	124154
262	1998	1998	2	9	0.40		1	0.30	0.025	2829	0	2829	21163
262	1998	1998	2	14	1.25		5	1.15	0.096	10845	0	10845	81123
262	1998	1998	2	15	1.52		1	1.42	0.118	13392	0	13392	100170
262	1998	1998	2	17	0.98		2	0.88	0.073	8299	0	8299	62077
262	1998	1998	2	20	1.08		3	0.98	0.082	9242	0	9242	69131
262	1998	1998	2	22	1.63		2	1.53	0.128	14429	0	14429	107929
262	1998	1998	2	23	1.15		1	1.05	0.088	9902	0	9902	74069
262	1998	1998	2	24	0.32		1	0.22	0.018	2075	0	2075	15519
262	1998	1998	3	6	0.35		13	0.25	0.021	2358	0	2358	17635
262	1998	1998	3	25	2.00		19	1.90	0.158	17918	0	17918	134030
262	1998	1998	3	26	0.32		1	0.22	0.018	2075	0	2075	15519
262	1998	1998	3	28	0.23		2	0.13	0.011	1226	0	1226	9170
262	1998	1998	3	29	0.12		1	0.02	0.002	189	0	189	1411
262	1998	1998	4	1	0.58		3	0.48	0.040	4527	0	4527	33860
262	1998	1998	4	2	0.12		1	0.02	0.002	189	0	189	1411
262	1998	1998	4	4	0.33		2	0.23	0.019	2169	0	2169	16225
262	1998	1998	4	11	0.07		7	0.00	0.000	0	0	0	0
262	1998	1998	4	12	1.64		1	1.54	0.128	14523	0	14523	108635
262	1998	1998	4	14	0.05		2	0.00	0.000	0	0	0	0
262	1998	1998	5	2	0.15		18	0.05	0.004	472	0	472	3527
262	1998	1998	5	3	0.97		1	0.87	0.073	8205	0	8205	61371
262	1998	1998	5	4	0.07		1	0.00	0.000	0	0	0	0
262	1998	1998	5	5	0.42		1	0.32	0.027	3018	0	3018	22573
262	1998	1998	5	6	0.10		1	0.00	0.000	0	0	0	0
262	1999	1998	9	5	0.75		30	0.65	0.054	6130	0	6130	45852
262	1999	1998	11	8	0.45		34	0.35	0.029	3301	0	3301	24690
262	1999	1998	11	28	1.25		20	1.15	0.096	10845	0	10845	81123
262	1999	1998	12	1	0.75		4	0.65	0.054	6130	0	6130	45852
262	1999	1998	12	6	0.20		5	0.10	0.008	943	0	943	7054
262	1999	1999	1	20	0.65		45	0.55	0.046	5187	0	5187	38798
262	1999	1999	1	21	0.07		1	0.00	0.000	0	0	0	0
262	1999	1999	1	26	0.22		5	0.12	0.010	1132	0	1132	8465
262	1999	1999	1	27	0.15		1	0.05	0.004	472	0	472	3527

262	1999	1999	1	31	0.67		4	0.57	0.048	5376	0	5376	40209
262	1999	1999	2	9	0.42		9	0.32	0.027	3018	0	3018	22573
262	1999	1999	2	10	0.30		1	0.20	0.017	1886	0	1886	14108
262	1999	1999	3	9	0.10		30	0.00	0.000	0	0	0	0
262	1999	1999	3	11	0.35		2	0.25	0.021	2358	0	2358	17635
262	1999	1999	3	15	1.97		4	1.87	0.156	17635	0	17635	131913
262	1999	1999	3	16	0.55		1	0.45	0.038	4244	0	4244	31744
262	1999	1999	3	17	0.02		1	0.00	0.000	0	0	0	0
262	1999	1999	3	19	0.09		2	0.00	0.000	0	0	0	0
262	1999	1999	3	20	1.01		1	0.91	0.076	8582	0	8582	64193
262	1999	1999	3	21	0.34		1	0.24	0.020	2263	0	2263	16930
262	1999	1999	3	23	0.13		2	0.03	0.003	283	0	283	2116
262	1999	1999	3	24	0.03		1	0.00	0.000	0	0	0	0
262	1999	1999	3	25	1.70		1	1.60	0.133	15089	0	15089	112867
262	1999	1999	3	26	0.64		1	0.54	0.045	5093	0	5093	38093
262	1999	1999	3	27	0.01		1	0.00	0.000	0	0	0	0
262	1999	1999	4	6	0.54		10	0.44	0.037	4150	0	4150	31038
262	1999	1999	4	7	0.39		1	0.29	0.024	2735	0	2735	20457
262	1999	1999	4	8	0.03		1	0.00	0.000	0	0	0	0
262	1999	1999	4	9	0.18		1	0.08	0.007	754	0	754	5643
262	1999	1999	4	11	0.48		2	0.38	0.032	3584	0	3584	26806
262	1999	1999	4	12	1.24		1	1.14	0.095	10751	0	10751	80418
262	2000	1999	11	8	1.30		26	1.20	0.100	11317	0	11317	84650
262	2000	1999	11	17	0.02		9	0.00	0.000	0	0	0	0
262	2000	1999	11	20	0.30		3	0.20	0.017	1886	0	1886	14108
262	2000	2000	1	17	0.02		28	0.00	0.000	0	0	0	0
262	2000	2000	1	18	0.01		1	0.00	0.000	0	0	0	0
262	2000	2000	1	24	0.01		6	0.00	0.000	0	0	0	0
262	2000	2000	1	25	1.00		1	0.90	0.075	8488	0	8488	63488
262	2000	2000	1	26	0.02		1	0.00	0.000	0	0	0	0
262	2000	2000	1	30	0.00		4	0.00	0.000	0	0	0	0
262	2000	2000	1	31	0.40		1	0.30	0.025	2829	0	2829	21163
262	2000	2000	2	4	0.40		4	0.30	0.025	2829	0	2829	21163
262	2000	2000	2	10	0.80		6	0.70	0.058	6602	0	6602	49379
262	2000	2000	2	11	0.30		1	0.20	0.017	1886	0	1886	14108
262	2000	2000	2	12	1.10		1	1.00	0.083	9431	0	9431	70542
262	2000	2000	2	13	0.67		1	0.57	0.048	5376	0	5376	40209
262	2000	2000	2	14	1.53		1	1.43	0.119	13486	0	13486	100875
262	2000	2000	2	15	1.00		1	0.90	0.075	8488	0	8488	63488
262	2000	2000	2	16	0.04		1	0.00	0.000	0	0	0	0
262	2000	2000	2	17	0.04		1	0.00	0.000	0	0	0	0
262	2000	2000	2	20	0.26		3	0.16	0.013	1509	0	1509	11287
262	2000	2000	2	21	1.45		1	1.35	0.113	12731	0	12731	95232
262	2000	2000	2	22	0.79		1	0.69	0.058	6507	0	6507	48674
262	2000	2000	2	23	1.64		1	1.54	0.128	14523	0	14523	108635
262	2000	2000	2	24	0.08		1	0.00	0.000	0	0	0	0
262	2000	2000	2	27	0.64		3	0.54	0.045	5093	0	5093	38093
262	2000	2000	2	28	0.46		1	0.36	0.030	3395	0	3395	25395
262	2000	2000	2	29	0.01		1	0.00	0.000	0	0	0	0

262	2000	2000	3	1	0.01		3	0.00	0.000	0	0	0	0
262	2000	2000	3	3	0.17		2	0.07	0.006	660	0	660	4938
262	2000	2000	3	4	0.32		1	0.22	0.018	2075	0	2075	15519
262	2000	2000	3	5	0.85		1	0.75	0.063	7073	0	7073	52906
262	2000	2000	3	6	0.66		1	0.56	0.047	5281	0	5281	39503
262	2000	2000	3	8	0.83		2	0.73	0.061	6884	0	6884	51496
262	2000	2000	3	9	0.04		1	0.00	0.000	0	0	0	0
262	2000	2000	4	15	0.16		37	0.06	0.005	566	0	566	4233
262	2000	2000	4	16	0.01		1	0.00	0.000	0	0	0	0
262	2000	2000	4	17	4.55		1	4.45	0.371	41967	0	41967	313912
262	2000	2000	4	18	1.51		1	1.41	0.118	13297	0	13297	99464
262	2000	2000	4	19	0.03		1	0.00	0.000	0	0	0	0
262	2000	2000	4	20	0.01		1	0.00	0.000	0	0	0	0
262	2000	2000	5	23	0.01		33	0.00	0.000	0	0	0	0
262	2000	2000	6	17	0.07		25	0.00	0.000	0	0	0	0
262	2000	2000	6	18	0.18		1	0.08	0.007	754	0	754	5643
262	2000	2000	6	24	0.05		6	0.00	0.000	0	0	0	0
262	2001	2000	9	16	0.01		23	0.00	0.000	0	0	0	0
262	2001	2000	10	12	0.11		27	0.01	0.001	94	0	94	705
262	2001	2000	10	13	0.01		1	0.00	0.000	0	0	0	0
262	2001	2000	10	26	0.11		13	0.01	0.001	94	0	94	705
262	2001	2000	10	27	1.27		1	1.17	0.098	11034	0	11034	82534
262	2001	2000	10	28	0.03		1	0.00	0.000	0	0	0	0
262	2001	2000	10	29	1.33		1	1.23	0.103	11600	0	11600	86767
262	2001	2000	10	30	0.17		1	0.07	0.006	660	0	660	4938
262	2001	2000	12	7	0.10		8	0.00	0.000	0	0	0	0
262	2001	2001	1	8	0.73		32	0.63	0.053	5941	0	5941	44441
262	2001	2001	1	9	0.13		1	0.03	0.003	283	0	283	2116
262	2001	2001	1	11	5.09		2	4.99	0.416	47059	0	47059	352004
262	2001	2001	1	12	1.92		1	1.82	0.152	17164	0	17164	128386
262	2001	2001	1	13	0.15		1	0.05	0.004	472	0	472	3527
262	2001	2001	1	24	1.01		11	0.91	0.076	8582	0	8582	64193
262	2001	2001	1	25	0.03		1	0.00	0.000	0	0	0	0
262	2001	2001	1	26	0.91		1	0.81	0.068	7639	0	7639	57139
262	2001	2001	1	27	0.17		1	0.07	0.006	660	0	660	4938
262	2001	2001	2	10	0.72		14	0.62	0.052	5847	0	5847	43736
262	2001	2001	2	11	0.15		1	0.05	0.004	472	0	472	3527
262	2001	2001	2	12	1.24		1	1.14	0.095	10751	0	10751	80418
262	2001	2001	2	13	1.54		1	1.44	0.120	13580	0	13580	101580
262	2001	2001	2	14	0.59		1	0.49	0.041	4621	0	4621	34566
262	2001	2001	2	15	0.01		1	0.00	0.000	0	0	0	0
262	2001	2001	2	18	0.12		3	0.02	0.002	189	0	189	1411
262	2001	2001	2	19	0.23		1	0.13	0.011	1226	0	1226	9170
262	2001	2001	2	20	1.28		1	1.18	0.098	11128	0	11128	83239
262	2001	2001	2	21	0.08		1	0.00	0.000	0	0	0	0
262	2001	2001	2	23	0.24		2	0.14	0.012	1320	0	1320	9876
262	2001	2001	2	24	0.23		1	0.13	0.011	1226	0	1226	9170
262	2001	2001	2	25	1.03		1	0.93	0.078	8771	0	8771	65604
262	2001	2001	2	26	0.42		1	0.32	0.027	3018	0	3018	22573

262	2001	2001	2	27	0.03		1	0.00	0.000	0	0	0	0
262	2001	2001	2	28	0.31		1	0.21	0.018	1980	0	1980	14814
262	2001	2001	3	4	0.61		7	0.51	0.043	4810	0	4810	35976
262	2001	2001	3	5	7.93		1	7.83	0.653	73843	0	73843	552343 yes
262	2001	2001	3	6	3.94		1	3.84	0.320	36214	0	36214	270881
262	2001	2001	3	7	0.55		1	0.45	0.038	4244	0	4244	31744
262	2001	2001	3	10	0.04		3	0.00	0.000	0	0	0	0
262	2001	2001	4	1	0.01		22	0.00	0.000	0	0	0	0
262	2001	2001	4	7	1.47		6	1.37	0.114	12920	0	12920	96642
262	2001	2001	4	8	0.04		1	0.00	0.000	0	0	0	0
262	2001	2001	4	10	0.14		2	0.04	0.003	377	0	377	2822
262	2001	2001	4	21	0.98		11	0.88	0.073	8299	0	8299	62077
262	2002	2001	9	8	0.01		17	0.00	0.000	0	0	0	0
262	2002	2001	10	30	0.11		53	0.01	0.001	94	0	94	705
262	2002	2001	10	31	0.62		1	0.52	0.043	4904	0	4904	36682
262	2002	2001	11	11	1.65		11	1.55	0.129	14618	0	14618	109340
262	2002	2001	11	12	0.06		1	0.00	0.000	0	0	0	0
262	2002	2001	11	13	1.26		1	1.16	0.097	10940	0	10940	81829
262	2002	2001	11	24	0.22		11	0.12	0.010	1132	0	1132	8465
262	2002	2001	11	25	2.37		1	2.27	0.189	21408	0	21408	160130
262	2002	2001	11	29	1.25		4	1.15	0.096	10845	0	10845	81123
262	2002	2001	11	30	0.02		1	0.00	0.000	0	0	0	0
262	2002	2001	12	3	1.28		4	1.18	0.098	11128	0	11128	83239
262	2002	2001	12	10	0.23		7	0.13	0.011	1226	0	1226	9170
262	2002	2001	12	14	0.04		4	0.00	0.000	0	0	0	0
262	2002	2001	12	15	0.10		1	0.00	0.000	0	0	0	0
262	2002	2001	12	20	0.01		5	0.00	0.000	0	0	0	0
262	2002	2001	12	21	0.38		1	0.28	0.023	2641	0	2641	19752
262	2002	2001	12	29	0.37		8	0.27	0.023	2546	0	2546	19046
262	2002	2001	12	30	0.45		1	0.35	0.029	3301	0	3301	24690
262	2002	2001	12	31	0.28		1	0.18	0.015	1698	0	1698	12698
262	2002	2002	1	3	0.38		3	0.28	0.023	2641	0	2641	19752
262	2002	2002	1	12	0.01		9	0.00	0.000	0	0	0	0
262	2002	2002	1	27	0.08		15	0.00	0.000	0	0	0	0
262	2002	2002	1	28	0.80		1	0.70	0.058	6602	0	6602	49379
262	2002	2002	1	29	0.05		1	0.00	0.000	0	0	0	0
262	2002	2002	2	17	0.95		19	0.85	0.071	8016	0	8016	59961
262	2002	2002	2	18	0.01		1	0.00	0.000	0	0	0	0
262	2002	2002	3	7	0.30		20	0.20	0.017	1886	0	1886	14108
262	2002	2002	3	17	0.01		10	0.00	0.000	0	0	0	0
262	2002	2002	3	18	0.26		1	0.16	0.013	1509	0	1509	11287
262	2002	2002	3	23	0.09		5	0.00	0.000	0	0	0	0
262	2002	2002	3	24	0.07		1	0.00	0.000	0	0	0	0
262	2002	2002	4	3	0.01		10	0.00	0.000	0	0	0	0
262	2002	2002	5	20	0.14		47	0.04	0.003	377	0	377	2822
262	2002	2002	7	13	0.02		24	0.00	0.000	0	0	0	0
262	2002	2002	8	12	0.01		30	0.00	0.000	0	0	0	0
262	2003	2002	9	29	0.24		48	0.14	0.012	1320	0	1320	9876
262	2003	2002	11	7	0.18		9	0.08	0.007	754	0	754	5643

262	2003	2002	11	8	5.40		1	5.30	0.442	49983	0	49983	373872
262	2003	2002	11	9	2.01		1	1.91	0.159	18013	0	18013	134735
262	2003	2002	11	10	0.09		1	0.00	0.000	0	0	0	0
262	2003	2002	11	22	0.01		12	0.00	0.000	0	0	0	0
262	2003	2002	11	30	0.08		8	0.00	0.000	0	0	0	0
262	2003	2002	12	7	0.03		8	0.00	0.000	0	0	0	0
262	2003	2002	12	15	1.01		8	0.91	0.076	8582	0	8582	64193
262	2003	2002	12	17	2.36		2	2.26	0.188	21313	0	21313	159425
262	2003	2002	12	18	0.09		1	0.00	0.000	0	0	0	0
262	2003	2002	12	19	0.01		1	0.00	0.000	0	0	0	0
262	2003	2002	12	20	3.03		1	2.93	0.244	27632	0	27632	206688
262	2003	2002	12	21	0.12		1	0.02	0.002	189	0	189	1411
262	2003	2002	12	22	1.25		1	1.15	0.096	10845	0	10845	81123
262	2003	2002	12	29	0.25		7	0.15	0.013	1415	0	1415	10581
262	2003	2002	12	31	0.06		2	0.00	0.000	0	0	0	0
262	2003	2003	1	1	0.06		1	0.00	0.000	0	0	0	0
262	2003	2003	2	11	0.49		41	0.39	0.033	3678	0	3678	27511
262	2003	2003	2	12	0.79		1	0.69	0.058	6507	0	6507	48674
262	2003	2003	2	13	1.90		1	1.80	0.150	16975	0	16975	126975
262	2003	2003	2	14	0.48		1	0.38	0.032	3584	0	3584	26806
262	2003	2003	2	16	0.02		2	0.00	0.000	0	0	0	0
262	2003	2003	2	17	0.02		1	0.00	0.000	0	0	0	0
262	2003	2003	2	25	0.81		8	0.71	0.059	6696	0	6696	50085
262	2003	2003	2	27	0.16		2	0.06	0.005	566	0	566	4233
262	2003	2003	2	28	0.01		1	0.00	0.000	0	0	0	0
262	2003	2003	3	5	0.02		8	0.00	0.000	0	0	0	0
262	2003	2003	3	15	4.62		10	4.52	0.377	42627	0	42627	318850
262	2003	2003	3	16	0.91		1	0.81	0.068	7639	0	7639	57139
262	2003	2003	4	3	0.08		18	0.00	0.000	0	0	0	0
262	2003	2003	4	5	0.01		2	0.00	0.000	0	0	0	0
262	2003	2003	4	13	0.93		8	0.83	0.069	7828	0	7828	58550
262	2003	2003	4	14	1.37		1	1.27	0.106	11977	0	11977	89588
262	2003	2003	4	15	0.01		1	0.00	0.000	0	0	0	0
262	2003	2003	4	28	0.18		13	0.08	0.007	754	0	754	5643
262	2003	2003	4	29	0.04		1	0.00	0.000	0	0	0	0
262	2003	2003	5	3	2.36		4	2.26	0.188	21313	0	21313	159425
262	2003	2003	5	4	0.10		1	0.00	0.000	0	0	0	0
262	2003	2003	5	7	0.04		3	0.00	0.000	0	0	0	0
262	2003	2003	5	8	0.01		1	0.00	0.000	0	0	0	0
262	2003	2003	5	24	0.01		16	0.00	0.000	0	0	0	0
262	2003	2003	6	3	0.02		10	0.00	0.000	0	0	0	0
262	2003	2003	6	4	0.04		1	0.00	0.000	0	0	0	0
262	2003	2003	6	6	0.01		2	0.00	0.000	0	0	0	0
262	2003	2003	6	10	0.08		4	0.00	0.000	0	0	0	0
262	2004	2003	11	1	0.90	E312	22	0.80	0.067	7545	0	7545	56434
262	2004	2003	11	4	0.10	E312	3	0.00	0.000	0	0	0	0
262	2004	2003	11	9	1.85	E312	5	1.75	0.146	16504	0	16504	123448
262	2004	2003	11	12	0.05	E312	3	0.00	0.000	0	0	0	0
262	2004	2003	11	13	0.10	E312	1	0.00	0.000	0	0	0	0

262	2004	2003	11	16	0.03	E312	3	0.00	0.000	0	0	0	0
262	2004	2003	12	7	0.01	E312	22	0.00	0.000	0	0	0	0
262	2004	2003	12	8	0.03	E312	1	0.00	0.000	0	0	0	0
262	2004	2003	12	10	0.01	E312	2	0.00	0.000	0	0	0	0
262	2004	2003	12	11	0.06	E312	1	0.00	0.000	0	0	0	0
262	2004	2003	12	12	0.06	E312	1	0.00	0.000	0	0	0	0
262	2004	2003	12	15	0.18	E312	3	0.08	0.007	754	0	754	5643
262	2004	2003	12	21	0.10	E312	6	0.00	0.000	0	0	0	0
262	2004	2003	12	23	0.23		2	0.13	0.011	1226	0	1226	9170
262	2004	2003	12	24	0.39		1	0.29	0.024	2735	0	2735	20457
262	2004	2003	12	25	0.95		1	0.85	0.071	8016	0	8016	59961
262	2004	2003	12	26	1.15		1	1.05	0.088	9902	0	9902	74069
262	2004	2003	12	30	0.09		4	0.00	0.000	0	0	0	0
262	2004	2004	1	2	0.69		3	0.59	0.049	5564	0	5564	41620
262	2004	2004	1	3	0.14		1	0.04	0.003	377	0	377	2822
262	2004	2004	1	25	0.01		22	0.00	0.000	0	0	0	0
262	2004	2004	1	28	0.06		3	0.00	0.000	0	0	0	0
262	2004	2004	2	3	1.26		6	1.16	0.097	10940	0	10940	81829
262	2004	2004	2	4	0.02		1	0.00	0.000	0	0	0	0
262	2004	2004	2	18	0.36		14	0.26	0.022	2452	0	2452	18341
262	2004	2004	2	19	0.48		1	0.38	0.032	3584	0	3584	26806
262	2004	2004	2	21	0.09		2	0.00	0.000	0	0	0	0
262	2004	2004	2	22	0.23		1	0.13	0.011	1226	0	1226	9170
262	2004	2004	2	23	1.10		1	1.00	0.083	9431	0	9431	70542
262	2004	2004	2	26	4.94		3	4.84	0.403	45645	0	45645	341423
262	2004	2004	2	27	0.02		1	0.00	0.000	0	0	0	0
262	2004	2004	3	2	0.64		6	0.54	0.045	5093	0	5093	38093
262	2004	2004	3	16	0.01		14	0.00	0.000	0	0	0	0
262	2004	2004	5	6	0.01		21	0.00	0.000	0	0	0	0
262	2004	2004	6	19	0.01		44	0.00	0.000	0	0	0	0
262	2005	2004	10	17	0.96		29	0.86	0.072	8110	0	8110	60666
262	2005	2004	10	18	0.34		1	0.24	0.020	2263	0	2263	16930
262	2005	2004	10	19	0.07		1	0.00	0.000	0	0	0	0
262	2005	2004	10	20	2.22		1	2.12	0.177	19993	0	19993	149549
262	2005	2004	10	22	0.01		2	0.00	0.000	0	0	0	0
262	2005	2004	10	27	2.23		5	2.13	0.178	20087	0	20087	150254
262	2005	2004	11	5	0.62		9	0.52	0.043	4904	0	4904	36682
262	2005	2004	11	8	0.21		3	0.11	0.009	1037	0	1037	7760
262	2005	2004	11	18	0.01		10	0.00	0.000	0	0	0	0
262	2005	2004	11	28	0.01		10	0.00	0.000	0	0	0	0
262	2005	2004	12	5	0.06		8	0.00	0.000	0	0	0	0
262	2005	2004	12	6	0.32		1	0.22	0.018	2075	0	2075	15519
262	2005	2004	12	7	0.12		1	0.02	0.002	189	0	189	1411
262	2005	2004	12	8	0.70		1	0.60	0.050	5658	0	5658	42325
262	2005	2004	12	27	1.36		19	1.26	0.105	11883	0	11883	88883
262	2005	2004	12	28	4.83		1	4.73	0.394	44607	0	44607	333663
262	2005	2004	12	29	0.82		1	0.72	0.060	6790	0	6790	50790
262	2005	2004	12	30	0.33		1	0.23	0.019	2169	0	2169	16225
262	2005	2004	12	31	2.04		1	1.94	0.162	18296	0	18296	136851

262	2005	2005	1	1	0.04		1	0.00	0.000	0	0	0	0
262	2005	2005	1	2	0.22		1	0.12	0.010	1132	0	1132	8465
262	2005	2005	1	3	2.24		1	2.14	0.178	20182	0	20182	150960
262	2005	2005	1	4	0.91		1	0.81	0.068	7639	0	7639	57139
262	2005	2005	1	7	1.79		3	1.69	0.141	15938	0	15938	119216
262	2005	2005	1	8	2.15		1	2.05	0.171	19333	0	19333	144611
262	2005	2005	1	9	5.42		1	5.32	0.443	50172	0	50172	375283
262	2005	2005	1	10	3.93		1	3.83	0.319	36120	0	36120	270176
262	2005	2005	1	11	0.85		1	0.75	0.063	7073	0	7073	52906
262	2005	2005	1	12	0.08		1	0.00	0.000	0	0	0	0
262	2005	2005	1	21	0.01		9	0.00	0.000	0	0	0	0
262	2005	2005	1	27	0.28		6	0.18	0.015	1698	0	1698	12698
262	2005	2005	1	28	0.39		1	0.29	0.024	2735	0	2735	20457
262	2005	2005	1	29	0.12		1	0.02	0.002	189	0	189	1411
262	2005	2005	2	11	0.35		13	0.25	0.021	2358	0	2358	17635
262	2005	2005	2	12	0.06		1	0.00	0.000	0	0	0	0
262	2005	2005	2	16	0.46		4	0.36	0.030	3395	0	3395	25395
262	2005	2005	2	17	0.01		1	0.00	0.000	0	0	0	0
262	2005	2005	2	18	1.13		1	1.03	0.086	9714	0	9714	72658
262	2005	2005	2	19	2.43		1	2.33	0.194	21974	0	21974	164363
262	2005	2005	2	20	0.70		1	0.60	0.050	5658	0	5658	42325
262	2005	2005	2	21	1.54		1	1.44	0.120	13580	0	13580	101580
262	2005	2005	2	22	1.02		1	0.92	0.077	8676	0	8676	64899
262	2005	2005	2	23	2.71		1	2.61	0.218	24614	0	24614	184114
262	2005	2005	2	28	0.66		5	0.56	0.047	5281	0	5281	39503
262	2005	2005	3	3	0.24		6	0.14	0.012	1320	0	1320	9876
262	2005	2005	3	4	0.98		1	0.88	0.073	8299	0	8299	62077
262	2005	2005	3	5	0.25		1	0.15	0.013	1415	0	1415	10581
262	2005	2005	3	10	0.01		5	0.00	0.000	0	0	0	0
262	2005	2005	3	18	0.01		8	0.00	0.000	0	0	0	0
262	2005	2005	3	19	0.57		1	0.47	0.039	4432	0	4432	33155
262	2005	2005	3	20	0.09		1	0.00	0.000	0	0	0	0
262	2005	2005	3	22	0.31		2	0.21	0.018	1980	0	1980	14814
262	2005	2005	3	23	4.92		1	4.82	0.402	45456	0	45456	340012
262	2005	2005	3	28	0.11		5	0.01	0.001	94	0	94	705
262	2005	2005	4	4	0.03		7	0.00	0.000	0	0	0	0
262	2005	2005	4	9	0.06		5	0.00	0.000	0	0	0	0
262	2005	2005	4	28	1.15		19	1.05	0.088	9902	0	9902	74069
262	2005	2005	4	29	0.03		1	0.00	0.000	0	0	0	0
262	2005	2005	5	6	1.03		7	0.93	0.078	8771	0	8771	65604
262	2005	2005	5	9	0.38		3	0.28	0.023	2641	0	2641	19752
262	2006	2005	9	26	0.04		48	0.00	0.000	0	0	0	0
262	2006	2005	10	18	0.87		23	0.77	0.064	7225	0	7225	54045
262	2006	2005	10	22	0.04		4	0.00	0.000	0	0	0	0
262	2006	2005	10	23	0.04		1	0.00	0.000	0	0	0	0
262	2006	2005	10	24	0.04		1	0.00	0.000	0	0	0	0
262	2006	2005	11	9	1.89		16	1.79	0.149	16879	0	16879	126253
262	2006	2005	11	10	0.04		1	0.00	0.000	0	0	0	0
262	2006	2005	12	2	0.35		23	0.25	0.021	2399	0	2399	17941

262	2006	2005	12	3	0.16		1	0.06	0.005	542	0	542	4055
262	2006	2005	12	19	0.04		16	0.00	0.000	0	0	0	0
262	2006	2005	12	26	0.12		7	0.02	0.002	171	0	171	1278
262	2006	2005	12	27	0.04		1	0.00	0.000	0	0	0	0
262	2006	2005	12	31	0.16		4	0.06	0.005	542	0	542	4055
262	2006	2006	1	1	1.57		1	1.47	0.123	13908	0	13908	104035
262	2006	2006	1	2	2.56		1	2.46	0.205	23191	0	23191	173466
262	2006	2006	1	3	0.35		1	0.25	0.021	2399	0	2399	17941
262	2006	2006	1	14	0.29		11	0.19	0.016	1792	0	1792	13403
262	2006	2006	1	15	0.07		1	0.00	0.000	0	0	0	0
262	2006	2006	1	18	0.01		3	0.00	0.000	0	0	0	0
262	2006	2006	1	19	0.01		1	0.00	0.000	0	0	0	0
262	2006	2006	2	18	0.58		30	0.48	0.040	4527	0	4527	33860
262	2006	2006	2	19	0.34		1	0.24	0.020	2263	0	2263	16930
262	2006	2006	2	20	0.04		1	0.00	0.000	0	0	0	0
262	2006	2006	2	27	0.04		7	0.00	0.000	0	0	0	0
262	2006	2006	2	28	3.04		1	2.94	0.245	27726	0	27726	207393
262	2006	2006	3	3	0.75		6	0.65	0.054	6130	0	6130	45852
262	2006	2006	3	4	0.02		1	0.00	0.000	0	0	0	0
262	2006	2006	3	6	0.27		2	0.17	0.014	1603	0	1603	11992
262	2006	2006	3	7	0.28		1	0.18	0.015	1698	0	1698	12698
262	2006	2006	3	10	0.26		3	0.16	0.013	1509	0	1509	11287
262	2006	2006	3	11	0.32		1	0.22	0.018	2075	0	2075	15519
262	2006	2006	3	12	0.13		1	0.03	0.003	283	0	283	2116
262	2006	2006	3	13	0.05		1	0.00	0.000	0	0	0	0
262	2006	2006	3	15	0.01		2	0.00	0.000	0	0	0	0
262	2006	2006	3	17	0.03		2	0.00	0.000	0	0	0	0
262	2006	2006	3	18	0.24		1	0.14	0.012	1320	0	1320	9876
262	2006	2006	3	21	0.32		3	0.22	0.018	2075	0	2075	15519
262	2006	2006	3	26	0.19		5	0.09	0.008	849	0	849	6349
262	2006	2006	3	28	0.86		2	0.76	0.063	7167	0	7167	53612
262	2006	2006	3	29	1.38		1	1.28	0.107	12071	0	12071	90294
262	2006	2006	3	31	0.02		2	0.00	0.000	0	0	0	0
262	2006	2006	4	1	0.34		1	0.24	0.020	2263	0	2263	16930
262	2006	2006	4	3	0.31		2	0.21	0.018	1980	0	1980	14814
262	2006	2006	4	4	2.82		1	2.72	0.227	25652	0	25652	191874
262	2006	2006	4	5	0.29		1	0.19	0.016	1792	0	1792	13403
262	2006	2006	4	6	0.05		1	0.00	0.000	0	0	0	0
262	2006	2006	4	8	0.02		2	0.00	0.000	0	0	0	0
262	2006	2006	4	11	0.12		3	0.02	0.002	189	0	189	1411
262	2006	2006	4	14	0.12		3	0.02	0.002	189	0	189	1411
262	2006	2006	4	15	0.30		1	0.20	0.017	1886	0	1886	14108
262	2006	2006	4	17	0.01		2	0.00	0.000	0	0	0	0
262	2006	2006	4	26	0.09		9	0.00	0.000	0	0	0	0
262	2006	2006	5	3	0.01		7	0.00	0.000	0	0	0	0
262	2006	2006	5	4	0.01		1	0.00	0.000	0	0	0	0
262	2006	2006	5	13	0.01		9	0.00	0.000	0	0	0	0
262	2006	2006	5	22	1.64		9	1.54	0.128	14523	0	14523	108635
262	2006	2006	6	1	0.12		10	0.02	0.002	189	0	189	1411

262	2006	2006	8	4	0.03		34	0.00	0.000	0	0	0	0
262	2006	2006	8	5	0.12		1	0.02	0.002	189	0	189	1411
262	2007	2006	9	8	0.01		34	0.00	0.000	0	0	0	0
262	2007	2006	10	2	0.04		25	0.00	0.000	0	0	0	0
262	2007	2006	11	27	0.32		56	0.22	0.018	2075	0	2075	15519
262	2007	2006	12	9	0.21		13	0.11	0.009	1037	0	1037	7760
262	2007	2006	12	10	0.72		1	0.62	0.052	5847	0	5847	43736
262	2007	2006	12	11	0.12		1	0.02	0.002	189	0	189	1411
262	2007	2006	12	12	0.01		1	0.00	0.000	0	0	0	0
262	2007	2006	12	17	0.06		5	0.00	0.000	0	0	0	0
262	2007	2006	12	22	0.03		5	0.00	0.000	0	0	0	0
262	2007	2006	12	27	0.44		5	0.34	0.028	3206	0	3206	23984
262	2007	2006	12	28	0.07		1	0.00	0.000	0	0	0	0
262	2007	2007	1	18	0.01		21	0.00	0.000	0	0	0	0
262	2007	2007	1	27	0.48		9	0.38	0.032	3584	0	3584	26806
262	2007	2007	1	28	0.87		1	0.77	0.064	7262	0	7262	54317
262	2007	2007	1	29	1.48		1	1.38	0.115	13014	0	13014	97348
262	2007	2007	1	31	0.20		2	0.10	0.008	943	0	943	7054
262	2007	2007	2	6	0.01		6	0.00	0.000	0	0	0	0
262	2007	2007	2	11	1.64		5	1.54	0.128	14523	0	14523	108635
262	2007	2007	2	12	0.04		1	0.00	0.000	0	0	0	0
262	2007	2007	2	13	0.03		1	0.00	0.000	0	0	0	0
262	2007	2007	2	15	0.02		2	0.00	0.000	0	0	0	0
262	2007	2007	2	17	0.04		2	0.00	0.000	0	0	0	0
262	2007	2007	2	19	0.47		2	0.37	0.031	3489	0	3489	26101
262	2007	2007	2	20	0.02		1	0.00	0.000	0	0	0	0
262	2007	2007	2	21	0.02		1	0.00	0.000	0	0	0	0
262	2007	2007	2	22	0.06		1	0.00	0.000	0	0	0	0
262	2007	2007	2	23	1.11		1	1.01	0.084	9525	0	9525	71247
262	2007	2007	2	25	0.03		2	0.00	0.000	0	0	0	0
262	2007	2007	2	27	0.10		2	0.00	0.000	0	0	0	0
262	2007	2007	2	28	0.19		1	0.09	0.008	849	0	849	6349
262	2007	2007	3	17	0.01		20	0.00	0.000	0	0	0	0
262	2007	2007	3	27	0.06		10	0.00	0.000	0	0	0	0
262	2007	2007	4	20	0.76		24	0.66	0.055	6224	0	6224	46558
262	2007	2007	4	21	0.22		1	0.12	0.010	1132	0	1132	8465
262	2007	2007	4	23	0.33		2	0.23	0.019	2169	0	2169	16225
262	2007	2007	7	11	0.01		18	0.00	0.000	0	0	0	0
262	2008	2007	9	4	0.04		24	0.00	0.000	0	0	0	0
262	2008	2007	9	22	0.08		18	0.00	0.000	0	0	0	0
262	2008	2007	9	23	0.16		1	0.06	0.005	542	0	542	4055
262	2008	2007	10	13	0.39		21	0.29	0.024	2770	0	2770	20718
262	2008	2007	10	28	0.04		15	0.00	0.000	0	0	0	0
262	2008	2007	11	4	0.04		7	0.00	0.000	0	0	0	0
262	2008	2007	12	7	0.35		34	0.25	0.021	2399	0	2399	17941
262	2008	2007	12	8	0.04		1	0.00	0.000	0	0	0	0
262	2008	2007	12	18	0.55		10	0.45	0.038	4255	0	4255	31827
262	2008	2007	12	19	1.42		1	1.32	0.110	12423	0	12423	92926
262	2008	2007	12	20	0.04		1	0.00	0.000	0	0	0	0

262	2008	2007	12	21	0.04		1	0.00	0.000	0	0	0	0
262	2008	2008	1	5	2.76		15	2.66	0.221	25047	0	25047	187352
262	2008	2008	1	6	0.39		1	0.29	0.024	2770	0	2770	20718
262	2008	2008	1	7	0.55		1	0.45	0.038	4255	0	4255	31827
262	2008	2008	1	22	0.08		15	0.00	0.000	0	0	0	0
262	2008	2008	1	23	2.40		1	2.30	0.192	21706	0	21706	162357
262	2008	2008	1	24	2.01		1	1.91	0.159	17993	0	17993	134585
262	2008	2008	1	25	0.58	E	1	0.48	0.040	4527	0	4527	33860
262	2008	2008	1	27	2.63	E	2	2.53	0.211	23860	0	23860	178471
262	2008	2008	1	28	1.05	E	1	0.95	0.079	8959	0	8959	67015
262	2008	2008	2	3	1.43	E	6	1.33	0.111	12543	0	12543	93821
262	2008	2008	2	4	0.12		1	0.02	0.002	171	0	171	1278
262	2008	2008	2	20	0.20		16	0.10	0.008	913	0	913	6832
262	2008	2008	2	22	0.28		2	0.18	0.015	1656	0	1656	12386
262	2008	2008	2	23	0.12		1	0.02	0.002	171	0	171	1278
262	2008	2008	2	24	1.26		1	1.16	0.097	10938	0	10938	81817
262	2008	2008	2	25	0.04		1	0.00	0.000	0	0	0	0
262	2008	2008	4	3	0.08		9	0.00	0.000	0	0	0	0
262	2009	2008	10	5	0.08		32	0.00	0.000	0	0	0	0
262	2009	2008	10	31	0.04		26	0.00	0.000	0	0	0	0
262	2009	2008	11	2	0.35		2	0.25	0.021	2399	0	2399	17941
262	2009	2008	11	4	0.63		2	0.53	0.044	4998	0	4998	37382
262	2009	2008	11	26	1.61		22	1.51	0.126	14280	0	14280	106812
262	2009	2008	11	27	0.47		1	0.37	0.031	3512	0	3512	26273
262	2009	2008	11	29	0.04		2	0.00	0.000	0	0	0	0
262	2009	2008	12	15	2.16	E	17	2.06	0.172	19427	0	19427	145316
262	2009	2008	12	16	0.12		1	0.02	0.002	171	0	171	1278
262	2009	2008	12	17	0.20		1	0.10	0.008	913	0	913	6832
262	2009	2008	12	22	0.31		5	0.21	0.018	2027	0	2027	15164
262	2009	2008	12	25	0.04		3	0.00	0.000	0	0	0	0
262	2009	2008	12	26	0.16		1	0.06	0.005	542	0	542	4055
262	2009	2009	1	22	0.12		27	0.02	0.002	171	0	171	1278
262	2009	2009	1	23	0.16		1	0.06	0.005	542	0	542	4055
262	2009	2009	1	24	1.10	E	1	1.00	0.083	9431	0	9431	70542
262	2009	2009	2	5	0.35		12	0.25	0.021	2399	0	2399	17941
262	2009	2009	2	6	0.63		1	0.53	0.044	4998	0	4998	37382
262	2009	2009	2	7	1.48	E	1	1.38	0.115	13014	0	13014	97348
262	2009	2009	2	9	0.24		2	0.14	0.011	1285	0	1285	9609
262	2009	2009	2	10	0.04		1	0.00	0.000	0	0	0	0
262	2009	2009	2	12	0.08		2	0.00	0.000	0	0	0	0
262	2009	2009	2	14	0.43		2	0.33	0.028	3141	0	3141	23495
262	2009	2009	2	16	1.10		2	1.00	0.084	9453	0	9453	70708
262	2009	2009	2	17	0.79	E	1	0.69	0.058	6507	0	6507	48674
262	2009	2009	2	22	0.08		5	0.00	0.000	0	0	0	0
262	2009	2009	2	23	0.04		1	0.00	0.000	0	0	0	0
262	2009	2009	3	4	0.55		12	0.45	0.038	4255	0	4255	31827
262	2009	2009	3	5	0.04		1	0.00	0.000	0	0	0	0
262	2009	2009	3	21	0.04		16	0.00	0.000	0	0	0	0
262	2009	2009	3	22	0.33	E	1	0.23	0.019	2169	0	2169	16225

262	2009	2009	4	8	0.54	E	17	0.44	0.037	4150	0	4150	31038
262	2009	2009	6	5	0.59		27	0.49	0.041	4626	0	4626	34604
262	2009	2009	6	6	0.04		1	0.00	0.000	0	0	0	0
262	2010	2009	10	13	0.35	E389	38	0.25	0.021	2358	0	2358	17635
262	2010	2009	10	14	4.37	E389	1	4.27	0.356	40269	0	40269	301214
262	2010	2009	10	15	0.12	E389	1	0.02	0.002	189	0	189	1411
262	2010	2009	12	7	0.63		23	0.53	0.044	4998	0	4998	37382
262	2010	2009	12	8	0.67		1	0.57	0.047	5369	0	5369	40159
262	2010	2009	12	11	0.59		3	0.49	0.041	4626	0	4626	34604
262	2010	2009	12	12	0.43		1	0.33	0.028	3141	0	3141	23495
262	2010	2009	12	13	0.71		1	0.61	0.051	5740	0	5740	42936
262	2010	2009	12	31	0.08		18	0.00	0.000	0	0	0	0
262	2010	2010	1	13	0.39		13	0.29	0.024	2770	0	2770	20718
262	2010	2010	1	14	0.04		1	0.00	0.000	0	0	0	0
262	2010	2010	1	18	0.98		4	0.88	0.074	8339	0	8339	62377
262	2010	2010	1	19	1.14		1	1.04	0.087	9824	0	9824	73486
262	2010	2010	1	20	0.59		1	0.49	0.041	4626	0	4626	34604
262	2010	2010	1	21	1.85		1	1.75	0.146	16507	0	16507	123476
262	2010	2010	1	22	1.14		1	1.04	0.087	9824	0	9824	73486
262	2010	2010	1	23	0.47		1	0.37	0.031	3512	0	3512	26273
262	2010	2010	1	26	0.04		3	0.00	0.000	0	0	0	0
262	2010	2010	1	27	0.51		1	0.41	0.034	3884	0	3884	29050
262	2010	2010	2	5	1.14		9	1.04	0.087	9824	0	9824	73486
262	2010	2010	2	6	1.14		1	1.04	0.087	9824	0	9824	73486
262	2010	2010	2	7	0.24		1	0.14	0.011	1285	0	1285	9609
262	2010	2010	2	9	0.04		2	0.00	0.000	0	0	0	0
262	2010	2010	2	10	0.39		1	0.29	0.024	2770	0	2770	20718
262	2010	2010	2	20	0.12		10	0.02	0.002	171	0	171	1278
262	2010	2010	2	21	0.04		1	0.00	0.000	0	0	0	0
262	2010	2010	2	24	0.04		3	0.00	0.000	0	0	0	0
262	2010	2010	2	25	0.51		1	0.41	0.034	3884	0	3884	29050
262	2010	2010	2	27	1.22		2	1.12	0.093	10567	0	10567	79040
262	2010	2010	3	3	0.04		7	0.00	0.000	0	0	0	0
262	2010	2010	3	4	0.31		1	0.21	0.018	2027	0	2027	15164
262	2010	2010	3	7	0.16		3	0.06	0.005	542	0	542	4055
262	2010	2010	4	5	0.63		29	0.53	0.044	4998	0	4998	37382
262	2010	2010	4	6	0.04		1	0.00	0.000	0	0	0	0
262	2010	2010	4	12	1.18		6	1.08	0.090	10196	0	10196	76263
262	2010	2010	4	13	0.04		1	0.00	0.000	0	0	0	0
262	2010	2010	4	20	0.04		7	0.00	0.000	0	0	0	0
262	2010	2010	4	21	0.47		1	0.37	0.031	3512	0	3512	26273
262	2010	2010	4	22	0.20		1	0.10	0.008	913	0	913	6832
262	2010	2010	4	28	0.04		6	0.00	0.000	0	0	0	0
262	2010	2010	5	18	0.12		20	0.02	0.002	171	0	171	1278
262	2011	2010	10	6	1.18		19	1.08	0.090	10196	0	10196	76263
262	2011	2010	10	7	0.04		1	0.00	0.000	0	0	0	0
262	2011	2010	10	16	0.04		9	0.00	0.000	0	0	0	0
262	2011	2010	10	17	0.08		1	0.00	0.000	0	0	0	0
262	2011	2010	10	19	0.04		2	0.00	0.000	0	0	0	0

262	2011	2010	10	20	0.12		1	0.02	0.002	171	0	171	1278
262	2011	2010	10	30	1.42		10	1.32	0.110	12423	0	12423	92926
262	2011	2010	11	8	0.20		9	0.10	0.008	913	0	913	6832
262	2011	2010	11	20	0.67		12	0.57	0.047	5369	0	5369	40159
262	2011	2010	11	21	0.28		1	0.18	0.015	1656	0	1656	12386
262	2011	2010	11	22	0.04		1	0.00	0.000	0	0	0	0
262	2011	2010	11	24	0.08		2	0.00	0.000	0	0	0	0
262	2011	2010	12	4	0.12		11	0.02	0.002	171	0	171	1278
262	2011	2010	12	6	0.71		2	0.61	0.051	5740	0	5740	42936
262	2011	2010	12	17	0.28		11	0.18	0.015	1656	0	1656	12386
262	2011	2010	12	18	1.06		1	0.96	0.080	9082	0	9082	67931
262	2011	2010	12	19	3.07		1	2.97	0.248	28017	0	28017	209570
262	2011	2010	12	20	2.72		1	2.62	0.218	24676	0	24676	184575
262	2011	2010	12	21	0.79		1	0.69	0.057	6483	0	6483	48491
262	2011	2010	12	22	0.75		1	0.65	0.054	6111	0	6111	45713
262	2011	2010	12	23	0.04		1	0.00	0.000	0	0	0	0
262	2011	2010	12	24	0.04		1	0.00	0.000	0	0	0	0
262	2011	2010	12	26	0.94		2	0.84	0.070	7968	0	7968	59599
262	2011	2010	12	29	0.83		3	0.73	0.061	6854	0	6854	51268
262	2011	2010	12	30	0.04		1	0.00	0.000	0	0	0	0
262	2011	2011	1	2	0.47		3	0.37	0.031	3512	0	3512	26273
262	2011	2011	1	3	0.59		1	0.49	0.041	4626	0	4626	34604
262	2011	2011	1	4	0.08		1	0.00	0.000	0	0	0	0
262	2011	2011	2	14	0.04		41	0.00	0.000	0	0	0	0
262	2011	2011	2	15	0.08		1	0.00	0.000	0	0	0	0
262	2011	2011	2	16	0.71		1	0.61	0.051	5753	0	5753	43031
262	2011	2011	2	17	0.04		1	0.00	0.000	0	0	0	0
262	2011	2011	2	18	2.32		1	2.22	0.185	20936	0	20936	156603
262	2011	2011	2	19	0.43		1	0.33	0.028	3112	0	3112	23279
262	2011	2011	2	25	0.75		6	0.65	0.054	6111	0	6111	45711
262	2011	2011	2	27	0.04		2	0.00	0.000	0	0	0	0
262	2011	2011	3	2	0.08		6	0.00	0.000	0	0	0	0
262	2011	2011	3	3	0.32		1	0.22	0.018	2075	0	2075	15519
262	2011	2011	3	19	0.17		16	0.07	0.006	660	0	660	4938
262	2011	2011	3	20	3.45		1	3.35	0.279	31593	0	31593	236315
262	2011	2011	3	21	0.93		1	0.83	0.069	7828	0	7828	58550
262	2011	2011	3	22	0.02		1	0.00	0.000	0	0	0	0
262	2011	2011	3	23	0.12		1	0.02	0.002	189	0	189	1411
262	2011	2011	3	24	0.56		1	0.46	0.038	4338	0	4338	32449
262	2011	2011	3	25	0.75		1	0.65	0.054	6130	0	6130	45852
262	2011	2011	3	27	0.09		2	0.00	0.000	0	0	0	0
262	2011	2011	4	3	0.04		7	0.00	0.000	0	0	0	0
262	2011	2011	4	4	0.01		1	0.00	0.000	0	0	0	0
262	2011	2011	4	8	0.03		4	0.00	0.000	0	0	0	0
262	2011	2011	5	15	0.05		37	0.00	0.000	0	0	0	0
262	2011	2011	5	16	0.01		1	0.00	0.000	0	0	0	0
262	2011	2011	5	17	0.44		1	0.34	0.028	3206	0	3206	23984
262	2011	2011	5	18	0.20		1	0.10	0.008	943	0	943	7054
262	2011	2011	5	19	0.02		1	0.00	0.000	0	0	0	0

262	2011	2011	6	5	0.64		17	0.54	0.045	5093	0	5093	38093
262	2011	2011	6	6	0.56		1	0.46	0.038	4338	0	4338	32449
262	2011	2011	6	22	0.01		16	0.00	0.000	0	0	0	0
262	2012	2011	9	23	0.01		32	0.00	0.000	0	0	0	0
262	2012	2011	9	29	0.01		6	0.00	0.000	0	0	0	0
262	2012	2011	10	5	0.59		7	0.49	0.041	4621	0	4621	34566
262	2012	2011	10	6	0.33		1	0.23	0.019	2169	0	2169	16225
262	2012	2011	11	5	0.02		30	0.00	0.000	0	0	0	0
262	2012	2011	11	6	0.27		1	0.17	0.014	1603	0	1603	11992
262	2012	2011	11	12	1.01		6	0.91	0.076	8582	0	8582	64193
262	2012	2011	11	20	0.69		8	0.59	0.049	5564	0	5564	41620
262	2012	2011	11	21	0.75		1	0.65	0.054	6130	0	6130	45852
262	2012	2011	12	12	0.39		22	0.29	0.024	2735	0	2735	20457
262	2012	2011	12	13	0.27		1	0.17	0.014	1603	0	1603	11992
262	2012	2012	1	21	1.83		39	1.73	0.144	16315	0	16315	122038
262	2012	2012	1	23	0.63		2	0.53	0.044	4998	0	4998	37387
262	2012	2012	1	24	0.86		1	0.76	0.063	7167	0	7167	53612
262	2012	2012	2	7	0.06		14	0.00	0.000	0	0	0	0
262	2012	2012	2	8	0.11		1	0.01	0.001	94	0	94	705
262	2012	2012	2	9	0.01		1	0.00	0.000	0	0	0	0
262	2012	2012	2	14	0.14		5	0.04	0.003	377	0	377	2822
262	2012	2012	2	16	0.01		2	0.00	0.000	0	0	0	0
262	2012	2012	3	17	1.33		32	1.23	0.103	11600	0	11600	86767
262	2012	2012	3	18	0.48		1	0.38	0.032	3584	0	3584	26806
262	2012	2012	3	19	0.24		1	0.14	0.012	1320	0	1320	9876
262	2012	2012	3	25	0.73		6	0.63	0.053	5941	0	5941	44441
262	2012	2012	3	26	0.44		1	0.34	0.028	3206	0	3206	23984
262	2012	2012	4	1	0.46		6	0.36	0.030	3395	0	3395	25395
262	2012	2012	4	11	1.84		10	1.74	0.145	16409	0	16409	122743
262	2012	2012	4	12	0.04		1	0.00	0.000	0	0	0	0
262	2012	2012	4	13	0.53		1	0.43	0.036	4055	0	4055	30333
262	2012	2012	4	14	0.42		1	0.32	0.027	3018	0	3018	22573
262	2012	2012	4	23	0.09		9	0.00	0.000	0	0	0	0
262	2012	2012	4	24	0.01		1	0.00	0.000	0	0	0	0
262	2012	2012	4	25	0.04		1	0.00	0.000	0	0	0	0
262	2012	2012	4	26	0.67		1	0.57	0.048	5376	0	5376	40209
262	2012	2012	4	27	0.06		1	0.00	0.000	0	0	0	0
262	2012	2012	6	5	0.01		8	0.00	0.000	0	0	0	0
262	2012	2012	6	18	0.01		13	0.00	0.000	0	0	0	0
262	2012	2012	7	5	0.01		18	0.00	0.000	0	0	0	0
262	2012	2012	7	7	0.01		2	0.00	0.000	0	0	0	0
262	2012	2012	7	8	0.01		1	0.00	0.000	0	0	0	0
262	2013	2012	9	7	0.14		30	0.04	0.003	377	0	377	2822
262	2013	2012	9	13	0.01		6	0.00	0.000	0	0	0	0
262	2013	2012	10	3	0.01		21	0.00	0.000	0	0	0	0
262	2013	2012	10	23	0.08		20	0.00	0.000	0	0	0	0
262	2013	2012	11	10	0.05		18	0.00	0.000	0	0	0	0
262	2013	2012	11	16	0.06		6	0.00	0.000	0	0	0	0
262	2013	2012	11	17	0.94		1	0.84	0.070	7922	0	7922	59255

262	2013	2012	11	18	0.30		1	0.20	0.017	1886	0	1886	14108
262	2013	2012	11	19	0.01		1	0.00	0.000	0	0	0	0
262	2013	2012	11	20	0.01		1	0.00	0.000	0	0	0	0
262	2013	2012	11	29	0.42		9	0.32	0.027	3018	0	3018	22573
262	2013	2012	11	30	0.39		1	0.29	0.024	2735	0	2735	20457
262	2013	2012	12	1	0.89		2	0.79	0.066	7450	0	7450	55728
262	2013	2012	12	2	0.34		1	0.24	0.020	2263	0	2263	16930
262	2013	2012	12	3	1.53		1	1.43	0.119	13486	0	13486	100875
262	2013	2012	12	13	0.16		10	0.06	0.005	566	0	566	4233
262	2013	2012	12	15	0.05		2	0.00	0.000	0	0	0	0
262	2013	2012	12	16	0.11		1	0.01	0.001	94	0	94	705
262	2013	2012	12	17	0.06		1	0.00	0.000	0	0	0	0
262	2013	2012	12	18	0.32		1	0.22	0.018	2075	0	2075	15519
262	2013	2012	12	23	0.48		5	0.38	0.032	3584	0	3584	26806
262	2013	2012	12	24	1.28		1	1.18	0.098	11128	0	11128	83239
262	2013	2012	12	26	0.27		2	0.17	0.014	1603	0	1603	11992
262	2013	2012	12	29	0.95		3	0.85	0.071	8016	0	8016	59961
262	2013	2012	12	30	0.65		1	0.55	0.046	5187	0	5187	38798
262	2013	2013	1	6	0.20		7	0.10	0.008	943	0	943	7054
262	2013	2013	1	7	0.16		1	0.06	0.005	566	0	566	4233
262	2013	2013	1	16	0.02		9	0.00	0.000	0	0	0	0
262	2013	2013	1	24	0.69		8	0.59	0.049	5564	0	5564	41620
262	2013	2013	1	25	0.87		1	0.77	0.064	7262	0	7262	54317
262	2013	2013	1	26	0.16		1	0.06	0.005	566	0	566	4233
262	2013	2013	1	27	0.01		1	0.00	0.000	0	0	0	0
262	2013	2013	2	8	0.08		12	0.00	0.000	0	0	0	0
262	2013	2013	2	9	0.09		1	0.00	0.000	0	0	0	0
262	2013	2013	2	20	0.33		11	0.23	0.019	2169	0	2169	16225
262	2013	2013	3	7	0.05		18	0.00	0.000	0	0	0	0
262	2013	2013	3	8	1.04		1	0.94	0.078	8865	0	8865	66309
262	2013	2013	3	16	0.02		8	0.00	0.000	0	0	0	0
262	2013	2013	3	30	0.01		14	0.00	0.000	0	0	0	0
262	2013	2013	3	31	0.42		1	0.32	0.027	3018	0	3018	22573
262	2013	2013	4	1	0.01		1	0.00	0.000	0	0	0	0
262	2013	2013	4	2	0.03		1	0.00	0.000	0	0	0	0
262	2013	2013	4	4	0.01		2	0.00	0.000	0	0	0	0
262	2013	2013	4	5	0.01		1	0.00	0.000	0	0	0	0
262	2013	2013	4	23	0.01		18	0.00	0.000	0	0	0	0
262	2013	2013	4	25	0.04		2	0.00	0.000	0	0	0	0
262	2013	2013	4	29	0.01		4	0.00	0.000	0	0	0	0
262	2013	2013	4	30	0.03		1	0.00	0.000	0	0	0	0
262	2013	2013	5	5	0.02		5	0.00	0.000	0	0	0	0
262	2013	2013	5	6	0.06		1	0.00	0.000	0	0	0	0
262	2013	2013	6	3	0.07		28	0.00	0.000	0	0	0	0
262	2013	2013	6	9	0.05		6	0.00	0.000	0	0	0	0
262	2013	2013	6	12	0.01		3	0.00	0.000	0	0	0	0
262	2013	2013	6	26	0.01		14	0.00	0.000	0	0	0	0
262	2013	2013	7	4	0.01		9	0.00	0.000	0	0	0	0
262	2013	2013	7	22	0.01		18	0.00	0.000	0	0	0	0

262	2013	2013	7	23	0.01		1	0.00	0.000	0	0	0	0
262	2013	2013	7	29	0.03		6	0.00	0.000	0	0	0	0
262	2013	2013	8	5	0.01		7	0.00	0.000	0	0	0	0
262	2013	2013	8	15	0.01		10	0.00	0.000	0	0	0	0
262	2013	2013	8	16	0.03		1	0.00	0.000	0	0	0	0
262	2013	2013	8	19	0.01		3	0.00	0.000	0	0	0	0
262	2013	2013	8	20	0.01		1	0.00	0.000	0	0	0	0
262	2014	2013	9	10	0.01		21	0.00	0.000	0	0	0	0
262	2014	2013	9	20	0.01		10	0.00	0.000	0	0	0	0
262	2014	2013	9	21	0.01		1	0.00	0.000	0	0	0	0
262	2014	2013	10	27	0.01		37	0.00	0.000	0	0	0	0
262	2014	2013	10	29	0.26		2	0.16	0.013	1509	0	1509	11287
262	2014	2013	11	21	0.22		23	0.12	0.010	1132	0	1132	8465
262	2014	2013	11	29	0.32		8	0.22	0.018	2075	0	2075	15519
262	2014	2013	11	30	0.06		1	0.00	0.000	0	0	0	0
262	2014	2013	12	7	0.18		8	0.08	0.007	754	0	754	5643
262	2014	2013	12	8	0.07		1	0.00	0.000	0	0	0	0
262	2014	2013	12	20	0.01		12	0.00	0.000	0	0	0	0
262	2014	2014	2	3	0.42		14	0.32	0.027	3018	0	3018	22573
262	2014	2014	2	7	0.65		4	0.55	0.046	5187	0	5187	38798
262	2014	2014	2	27	1.62		20	1.52	0.127	14335	0	14335	107224
262	2014	2014	2	28	1.72		1	1.62	0.135	15278	0	15278	114278
262	2014	2014	3	1	0.73		4	0.63	0.052	5941	0	5941	44441
262	2014	2014	3	2	1.04		1	0.94	0.078	8865	0	8865	66309
262	2014	2014	3	3	0.02		1	0.00	0.000	0	0	0	0
262	2014	2014	3	7	0.01		4	0.00	0.000	0	0	0	0
262	2014	2014	3	27	0.23		20	0.13	0.011	1226	0	1226	9170
262	2014	2014	3	28	0.01		1	0.00	0.000	0	0	0	0
262	2014	2014	3	30	0.03		2	0.00	0.000	0	0	0	0
262	2014	2014	4	1	0.22		2	0.12	0.010	1132	0	1132	8465
262	2014	2014	4	2	0.27		1	0.17	0.014	1603	0	1603	11992
262	2014	2014	4	3	0.01		1	0.00	0.000	0	0	0	0
262	2014	2014	4	10	0.01		7	0.00	0.000	0	0	0	0
262	2014	2014	4	26	0.03		16	0.00	0.000	0	0	0	0
262	2014	2014	5	27	0.01		31	0.00	0.000	0	0	0	0
262	2014	2014	6	9	0.02		13	0.00	0.000	0	0	0	0
262	2014	2014	6	10	0.02		1	0.00	0.000	0	0	0	0
262	2014	2014	6	11	0.01		1	0.00	0.000	0	0	0	0
262	2014	2014	7	5	0.01		25	0.00	0.000	0	0	0	0
262	2014	2014	7	16	0.04		11	0.00	0.000	0	0	0	0
262	2014	2014	7	20	0.01		4	0.00	0.000	0	0	0	0
262	2014	2014	7	27	0.01		7	0.00	0.000	0	0	0	0
262	2014	2014	8	15	0.01		19	0.00	0.000	0	0	0	0
262	2014	2014	8	24	0.01		9	0.00	0.000	0	0	0	0
262	2015	2014	10	10	0.02		17	0.00	0.000	0	0	0	0
262	2015	2014	11	1	0.62		22	0.52	0.043	4904	0	4904	36682
262	2015	2014	11	2	0.01		1	0.00	0.000	0	0	0	0
262	2015	2014	12	2	0.72		31	0.62	0.052	5847	0	5847	43736
262	2015	2014	12	3	2.53		1	2.43	0.202	22917	0	22917	171417

262	2015	2014	12	5	0.04		2	0.00	0.000	0	0	0	0
262	2015	2014	12	6	0.01		1	0.00	0.000	0	0	0	0
262	2015	2014	12	12	1.48		6	1.38	0.115	13014	0	13014	97348
262	2015	2014	12	13	0.03		1	0.00	0.000	0	0	0	0
262	2015	2014	12	16	0.74		3	0.64	0.053	6036	0	6036	45147
262	2015	2014	12	17	0.52		1	0.42	0.035	3961	0	3961	29628
262	2015	2014	12	19	0.01		2	0.00	0.000	0	0	0	0
262	2015	2015	1	11	0.82		23	0.72	0.060	6790	0	6790	50790
262	2015	2015	1	20	0.01		9	0.00	0.000	0	0	0	0
262	2015	2015	1	27	0.12		7	0.02	0.002	189	0	189	1411
262	2015	2015	2	4	0.05		8	0.00	0.000	0	0	0	0
262	2015	2015	2	5	0.01		1	0.00	0.000	0	0	0	0
262	2015	2015	2	7	0.27		2	0.17	0.014	1603	0	1603	11992
262	2015	2015	2	8	1.14		1	1.04	0.087	9808	0	9808	73364
262	2015	2015	2	9	0.16		1	0.06	0.005	566	0	566	4233
262	2015	2015	2	18	0.01		9	0.00	0.000	0	0	0	0
262	2015	2015	2	23	0.37		5	0.27	0.022	2546	0	2546	19046
262	2015	2015	3	1	0.12		9	0.02	0.002	189	0	189	1411
262	2015	2015	3	3	0.16		2	0.06	0.005	566	0	566	4233
262	2015	2015	3	4	0.01		1	0.00	0.000	0	0	0	0
262	2015	2015	3	10	0.02		6	0.00	0.000	0	0	0	0
262	2015	2015	3	30	0.01		20	0.00	0.000	0	0	0	0
262	2015	2015	4	7	0.02		8	0.00	0.000	0	0	0	0
262	2015	2015	4	8	0.31		1	0.21	0.017	1980	0	1980	14814
262	2015	2015	4	26	0.02		18	0.00	0.000	0	0	0	0
262	2015	2015	5	1	0.01		5	0.00	0.000	0	0	0	0
262	2015	2015	5	15	0.10		14	0.00	0.000	0	0	0	0
262	2015	2015	6	1	0.01		17	0.00	0.000	0	0	0	0
262	2015	2015	6	9	0.03		8	0.00	0.000	0	0	0	0
262	2015	2015	6	10	0.19		1	0.09	0.007	849	0	849	6349
262	2015	2015	6	11	0.02		1	0.00	0.000	0	0	0	0
262	2015	2015	6	13	0.02		2	0.00	0.000	0	0	0	0
262	2016	2015	9	14	0.01		32	0.00	0.000	0	0	0	0
262	2016	2015	9	15	0.10		1	0.00	0.000	0	0	0	0
262	2016	2015	10	5	0.18		21	0.08	0.007	754	0	754	5643
262	2016	2015	11	3	0.08		29	0.00	0.000	0	0	0	0
262	2016	2015	11	10	0.03		7	0.00	0.000	0	0	0	0
262	2016	2015	11	16	0.14		6	0.04	0.003	377	0	377	2822
262	2016	2015	12	11	0.06		26	0.00	0.000	0	0	0	0
262	2016	2015	12	12	0.07		1	0.00	0.000	0	0	0	0
262	2016	2015	12	14	0.22		2	0.12	0.010	1132	0	1132	8465
262	2016	2015	12	20	0.27		6	0.17	0.014	1603	0	1603	11992
262	2016	2015	12	22	0.03		2	0.00	0.000	0	0	0	0
262	2016	2015	12	23	0.04		1	0.00	0.000	0	0	0	0
262	2016	2015	12	25	0.04		2	0.00	0.000	0	0	0	0
262	2016	2016	1	5	1.26		11	1.16	0.097	10940	0	10940	81829
262	2016	2016	1	6	0.71		1	0.61	0.051	5753	0	5753	43031
262	2016	2016	1	7	0.89		1	0.79	0.066	7450	0	7450	55728
262	2016	2016	1	8	0.03		1	0.00	0.000	0	0	0	0

262	2016	2016	1	10	0.06		2	0.00	0.000	0	0	0	0
262	2016	2016	1	11	0.11		1	0.01	0.001	94	0	94	705
262	2016	2016	1	18	0.02		7	0.00	0.000	0	0	0	0
262	2016	2016	1	19	0.14		1	0.04	0.003	377	0	377	2822
262	2016	2016	1	20	0.91		1	0.81	0.067	7639	0	7639	57139
262	2016	2016	1	23	0.09		3	0.00	0.000	0	0	0	0
262	2016	2016	1	31	0.40		8	0.30	0.025	2829	0	2829	21163
262	2016	2016	2	1	0.66		1	0.56	0.047	5281	0	5281	39503
262	2016	2016	2	18	0.30		17	0.20	0.017	1886	0	1886	14108
262	2016	2016	3	5	0.02		18	0.00	0.000	0	0	0	0
262	2016	2016	3	6	2.08		1	1.98	0.165	18673	0	18673	139673
262	2016	2016	3	7	0.53		1	0.43	0.036	4055	0	4055	30333
262	2016	2016	3	8	0.40		1	0.30	0.025	2829	0	2829	21163
262	2016	2016	3	12	0.62		4	0.52	0.043	4904	0	4904	36682
262	2016	2016	3	14	0.03		2	0.00	0.000	0	0	0	0
262	2016	2016	3	20	0.02		6	0.00	0.000	0	0	0	0
262	2016	2016	4	8	0.14		19	0.04	0.003	377	0	377	2822
262	2016	2016	4	9	0.51		1	0.41	0.034	3867	0	3867	28922
262	2016	2016	4	10	0.58		1	0.48	0.040	4527	0	4527	33860
262	2016	2016	5	4	0.05		24	0.00	0.000	0	0	0	0
262	2016	2016	5	18	0.01		14	0.00	0.000	0	0	0	0
262	2016	2016	5	19	0.01		1	0.00	0.000	0	0	0	0
262	2016	2016	5	29	0.03		10	0.00	0.000	0	0	0	0
262	2016	2016	5	30	0.01		1	0.00	0.000	0	0	0	0
262	2016	2016	5	31	0.01		1	0.00	0.000	0	0	0	0
262	2016	2016	6	3	0.01		3	0.00	0.000	0	0	0	0
262	2016	2016	6	4	0.01		1	0.00	0.000	0	0	0	0
262	2016	2016	6	5	0.06		1	0.00	0.000	0	0	0	0
262	2016	2016	6	25	0.01		20	0.00	0.000	0	0	0	0
262	2016	2016	7	15	0.02		21	0.00	0.000	0	0	0	0
262	2016	2016	7	25	0.03		10	0.00	0.000	0	0	0	0
262	2016	2016	7	31	0.01		6	0.00	0.000	0	0	0	0
262	2016	2016	8	1	0.01		1	0.00	0.000	0	0	0	0
262	2016	2016	8	15	0.02		14	0.00	0.000	0	0	0	0
262	2016	2016	8	18	0.03		3	0.00	0.000	0	0	0	0
262	2017	2016	9	19	0.01		32	0.00	0.000	0	0	0	0
262	2017	2016	9	20	0.01		1	0.00	0.000	0	0	0	0
262	2017	2016	10	14	0.01		25	0.00	0.000	0	0	0	0
262	2017	2016	10	15	0.01		1	0.00	0.000	0	0	0	0
262	2017	2016	10	16	0.03		1	0.00	0.000	0	0	0	0
262	2017	2016	10	17	0.54		1	0.44	0.037	4150	0	4150	31038
262	2017	2016	10	26	0.01		9	0.00	0.000	0	0	0	0
262	2017	2016	10	27	0.01		1	0.00	0.000	0	0	0	0
262	2017	2016	10	28	0.24		1	0.14	0.012	1320	0	1320	9876
262	2017	2016	10	29	0.03		1	0.00	0.000	0	0	0	0
262	2017	2016	10	31	0.28		2	0.18	0.015	1698	0	1698	12698
262	2017	2016	11	1	0.01		1	0.00	0.000	0	0	0	0
262	2017	2016	11	21	0.92		20	0.82	0.068	7733	0	7733	57844
262	2017	2016	11	27	0.34		6	0.24	0.020	2263	0	2263	16930

262	2017	2016	11	28	0.01		1	0.00	0.000	0	0	0	0
262	2017	2016	12	9	0.11		12	0.01	0.001	94	0	94	705
262	2017	2016	12	13	0.01		4	0.00	0.000	0	0	0	0
262	2017	2016	12	16	1.89		3	1.79	0.149	16881	0	16881	126270
262	2017	2016	12	24	1.52		8	1.42	0.118	13392	0	13392	100170
262	2017	2016	12	30	0.02		6	0.00	0.000	0	0	0	0
262	2017	2016	12	31	0.25		1	0.15	0.012	1415	0	1415	10581
262	2017	2017	1	1	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	1	5	0.66		4	0.56	0.047	5281	0	5281	39503
262	2017	2017	1	7	0.21		2	0.11	0.009	1037	0	1037	7760
262	2017	2017	1	8	0.31		1	0.21	0.017	1980	0	1980	14814
262	2017	2017	1	9	1.96		1	1.86	0.155	17541	0	17541	131208
262	2017	2017	1	11	0.77		2	0.67	0.056	6319	0	6319	47263
262	2017	2017	1	12	0.15		1	0.05	0.004	472	0	472	3527
262	2017	2017	1	13	0.03		1	0.00	0.000	0	0	0	0
262	2017	2017	1	19	1.73		6	1.63	0.136	15372	0	15372	114983
262	2017	2017	1	20	0.74		1	0.64	0.053	6036	0	6036	45147
262	2017	2017	1	21	1.70		1	1.60	0.133	15089	0	15089	112867
262	2017	2017	1	22	0.42		1	0.32	0.027	3018	0	3018	22573
262	2017	2017	1	23	1.13		1	1.03	0.086	9714	0	9714	72658
262	2017	2017	1	24	0.14		1	0.04	0.003	377	0	377	2822
262	2017	2017	2	2	0.03		9	0.00	0.000	0	0	0	0
262	2017	2017	2	3	0.59		1	0.49	0.041	4621	0	4621	34566
262	2017	2017	2	4	0.40		1	0.30	0.025	2829	0	2829	21163
262	2017	2017	2	5	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	2	6	2.14		1	2.04	0.170	19239	0	19239	143906
262	2017	2017	2	7	0.47		1	0.37	0.031	3489	0	3489	26101
262	2017	2017	2	8	0.88		1	0.78	0.065	7356	0	7356	55023
262	2017	2017	2	9	0.04		1	0.00	0.000	0	0	0	0
262	2017	2017	2	10	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	2	11	0.59		1	0.49	0.041	4621	0	4621	34566
262	2017	2017	2	17	1.00		6	0.90	0.075	8488	0	8488	63488
262	2017	2017	2	18	2.79		1	2.69	0.224	25369	0	25369	189758
262	2017	2017	2	19	0.16		1	0.06	0.005	566	0	566	4233
262	2017	2017	2	20	0.96		1	0.86	0.072	8110	0	8110	60666
262	2017	2017	2	21	0.46		1	0.36	0.030	3395	0	3395	25395
262	2017	2017	2	22	0.11		1	0.01	0.001	94	0	94	705
262	2017	2017	2	26	0.09		4	0.00	0.000	0	0	0	0
262	2017	2017	2	27	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	2	28	0.02		1	0.00	0.000	0	0	0	0
262	2017	2017	3	6	0.36		9	0.26	0.022	2452	0	2452	18341
262	2017	2017	3	14	0.01		8	0.00	0.000	0	0	0	0
262	2017	2017	3	15	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	3	16	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	3	18	0.02		2	0.00	0.000	0	0	0	0
262	2017	2017	3	19	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	3	20	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	3	21	0.39		1	0.29	0.024	2735	0	2735	20457
262	2017	2017	3	22	0.61		1	0.51	0.042	4810	0	4810	35976

262	2017	2017	3	23	0.14		1	0.04	0.003	377	0	377	2822
262	2017	2017	4	8	0.49		16	0.39	0.032	3678	0	3678	27511
262	2017	2017	4	14	0.05		6	0.00	0.000	0	0	0	0
262	2017	2017	4	17	0.09		3	0.00	0.000	0	0	0	0
262	2017	2017	4	18	0.15		1	0.05	0.004	472	0	472	3527
262	2017	2017	4	19	0.28		1	0.18	0.015	1698	0	1698	12698
262	2017	2017	5	4	0.03		15	0.00	0.000	0	0	0	0
262	2017	2017	5	5	0.04		1	0.00	0.000	0	0	0	0
262	2017	2017	5	7	0.11		2	0.01	0.001	94	0	94	705
262	2017	2017	5	8	0.11		1	0.01	0.001	94	0	94	705
262	2017	2017	5	24	0.01		16	0.00	0.000	0	0	0	0
262	2017	2017	6	20	0.01		27	0.00	0.000	0	0	0	0
262	2017	2017	6	23	0.04		3	0.00	0.000	0	0	0	0
262	2017	2017	7	12	0.03		20	0.00	0.000	0	0	0	0
262	2017	2017	7	18	0.01		6	0.00	0.000	0	0	0	0
262	2017	2017	7	24	0.01		6	0.00	0.000	0	0	0	0
262	2017	2017	7	25	0.01		1	0.00	0.000	0	0	0	0
262	2017	2017	8	26	0.01		32	0.00	0.000	0	0	0	0
262	2017	2017	8	27	0.05		1	0.00	0.000	0	0	0	0
262	2017	2017	8	28	0.01		1	0.00	0.000	0	0	0	0
262	2018	2017	9	4	0.01		7	0.00	0.000	0	0	0	0
262	2018	2017	9	11	0.27		7	0.17	0.014	1603	0	1603	11992

Attachment D

2023 Rainfall at the Gaviota Coast



- Home
- Map
- Sites
- Dashboards
- Bookmarks

Rainfall - Increment (2581)

Reload

Home > Sites > Gaviota Coast (2581) > Rainfall - Increment (2581)



0.01 in
3 hours ago



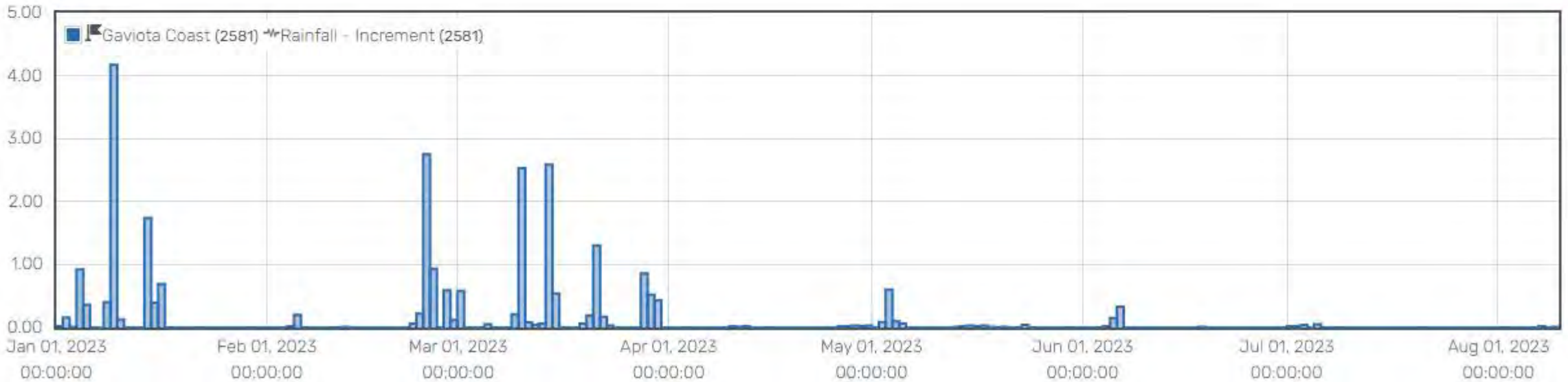
0.17 in
Value Max



0.00 in
Value Min

01 January, 2023 - 09 August, 2023

Markers Legend Daily



Attachment E

Central Coast Regional Water Quality Control Board Notice of Applicability
dated June 11, 2021



Central Coast Regional Water Quality Control Board

June 11, 2021

Sent via Electronic Mail
Certified mail No. 7020 1810 0002 0768 8024

John Dewey
Chief Executive Officer
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza Drive, Suite 200
Newport Beach, CA 92660
john@deweygroup.com

Dear Mr. Dewey,

LAND DISPOSAL PROGRAM: TAJIGUAS COMPOST MANAGEMENT UNIT, 14470 CALLE REAL, GOLETA, SANTA BARBARA COUNTY – NOTICE OF APPLICABILITY, WATER QUALITY ORDER 2020-0012 AND APPROVAL OF THE WATER AND WASTEWATER MANAGEMENT PLAN, WDID NO. 3 420621873

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff received a notice of intent (NOI) and filing fee on June 18, 2020 for the proposed Tajiguas Compost Management Unit (Facility) composting operation. On May 19, 2021, staff received a Technical Report for the proposed Facility via GeoTracker with a site-specific Water and Wastewater Management Plan. The Facility will be located at 14470 Calle Real in Goleta as a postclosure land use on the top deck of the Tajiguas Solid Waste Site (Landfill). The County of Santa Barbara, Department of Public Works is the landowner of the Facility. The Facility operator will be Mustang Renewable Power Ventures, LLC (Discharger). The documents were submitted to obtain coverage under Water Quality Order 2020-0012-DWQ, General Waste Discharge Requirements for Commercial Composting Operations (General Order). For more information please visit the [weblink to the General Order](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wqo2020_0012_dwq.pdf) (https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wqo2020_0012_dwq.pdf).

Notice of Applicability

Central Coast Water Board staff developed this notice of applicability (NOA) in response to the NOI and Technical Report. Based on staff's review of these documents, the Facility meets the conditions of the General Order, and is hereby covered under General Order **2020-0012-DWQ** as a **Tier II** composting operation. The Discharger

DR. JEAN-PIERRE WOLFF, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

Mr. John Dewey

- 2 -

June 11, 2021

must comply with all Tier II requirements of the General Order and as outlined in this NOA.

The filing fee for the Tajiguas Compost Management Unit is based on Threat to Water Quality and Complexity rating of 3C. The submitted \$2,625 filing fee covers the first year permitted by this NOA. The Discharger shall submit the required annual fee (as specified in the annual billing statement issued by the State Water Resources Control Board) until the NOA is officially terminated.

The Discharger is responsible for implementing all operations in a manner that complies with the General Order. Any noncompliance with the General Order constitutes a violation of the Water Code, and is grounds for enforcement action, and/or termination of enrollment under the General Order. Compliance with the General Order requires the Discharger to implement and comply with all aspects of the NOI and Technical Report.

Conditions of the Composting General Order NOA include, but are not limited to:

- 1) The Discharger be in full compliance with the General Order prior to beginning composting operations and waste placement.
- 2) A Final Post-Construction Report must be submitted 60 days after the completion of all construction activities associated with all applicable containment and monitoring structures, as required for compliance with this General Order and the MRP. The Final Post-Construction Report must contain as-built plans and specifications to document that containment and monitoring structures were properly constructed and tested.
- 3) By April 1st of each year, the Discharger must submit an Annual Monitoring and Maintenance Report as required by the Monitoring and Reporting Program (MRP).
- 4) A revised NOI is required 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.
- 5) The Discharger must comply with any required stormwater permits and regulations. Please see the [State Water Resources Control Board Storm Water Program page](#) for information about stormwater permits.
(https://www.waterboards.ca.gov/water_issues/programs/stormwater/)

Attachment B of the General Order includes specific monitoring and reporting requirements that you must comply with, including routine monitoring and reporting. As indicated in the General Order, the State Water Board and Regional Water Boards are transitioning to the paperless office system. Dischargers must submit reports (both technical and monitoring reports) to the State Water Board's GeoTracker database over the Internet in portable document format (PDF) as specified in California Code of Regulations, Title 23, [Section 3892\(d\)](#) and [Section 3893](#). In addition, analytical data must be uploaded to the GeoTracker database in Electronic Deliverable Format (EDF)

under a site-specific global identification number. Please use your site specific Geotracker project identification number (**T10000017039**) to upload reports and data. The [Tajiguas Compost Management Unit GeoTracker page](https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000017039) can be found at: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000017039.

Water and Wastewater Management Plan

The Technical Report includes a Water and Wastewater Management Plan with information about how water will be managed onsite to prevent the discharge of wastewater from the Facility. Leachate and wastewater are defined in the General Order as “any liquid formed by the drainage of liquids from, or percolation/flow of liquids through any feedstock, additive, amendment, or compost (active, curing, or final product) pile.”

The Discharger will to collect site runoff (leachate/wastewater) from low intensity rainfall events within collection tanks to then reuse the wastewater on the compost piles to maintain moisture conditions. For high intensity and long duration storms, the Discharger plans to prevent the production of wastewater by covering compost with waterproof tarpaulins, sweeping the isles between the windrows, deploying coconut fiber waddles between the compost rows, and discharging clean stormwater to the Landfill's North Sedimentation Basin, which ultimately discharges to Pila Creek.

The Discharger included a water balance analysis to demonstrate that if the Facility is managed and operated according to the Water and Wastewater Management Plan, wastewater will not be discharged from the Facility. Per the MRP, the Discharger will submit an Annual Monitoring and Maintenance Report with inspection and monitoring information which includes reporting quarterly information about capacities within the storage systems, inspection information about the wastewater management system, and information detailing discharges from the Facility. Central Coast Water Board staff have reviewed and hereby approves the Water and Wastewater Management Plan.

Information to Petition This Action

Any person affected by this action of the Water Board may petition the State Water Board to review the action in accordance with California Water Code, [Section 13320](#) and California Code of Regulations, Title 23, [Section 2050](#). The petition must be received by the State Water Board, Office of Chief Counsel, P.O. Box 100 Sacramento, 95812 within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

Mr. John Dewey

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June 11, 2021

If you have any questions, please contact **Jordan Haserot by phone at (805) 542-4781** or email at jordan.haserot@waterboards.ca.gov, or Ryan Lodge at **(805) 549-3506**.

Sincerely,

for Mathew T. Keeling
Executive Officer

Cc:

Leslie Wells (Santa Barbara County Public Works), lwells@cosbpw.net
Todd Curtis (Santa Barbara County Public Works), tcurtis@cosbpw.net
Jamie Reyes (Santa Barbara County Public Works), jreyes@cosbpw.net
Jeanette Gonzales-Knight (Santa Barbara County Public Works), jgonzal@cosbpw.net
John Kular (John Kular Consulting), johnkularpe@gmail.com
Norma Campos Bernal (Santa Barbara County Public Health, LEA),
norma.camposbernal@sbcphd.org
Ember Christensen (State Water Board), Ember.Christensen@waterboards.ca.gov
Ryan Lodge (Central Coast Water Board), ryan.lodge@waterboards.ca.gov
Jordan Haserot (Central Coast Water Board), jordan.haserot@waterboards.ca.gov

R:\RB3\Shared\LDU\Program\Compost\Compost Facilities\Tajiguas\NOA letter Tajiguas
Compost.docx

GeoTracker ID: T10000017039

Jeanette Gonzales-Knight

From: Carlyle Johnston
Sent: Wednesday, October 11, 2023 10:44 PM
To: john@deweygroup.com; 'Dylan Ellis'; Gerardo Pinelas
Cc: Marty Wilder; Jeanette Gonzales-Knight; Travis Spier
Subject: County Right to Perform: CMU Runoff Pipe Replacement

Dear John Dewey,

This email is serving as official notice of County Right to Perform under Section 14.8 of the Agreement between the County and MSB (included below for convenience).

Today you were notified by the County's Operations Manager Travis Spier that no work has taken place on the CMU Runoff Pipe Replacement project since the County inspection that took place on October 3, 2023 (an eight day period). Per Section 14.8, the County has the right to take over a project inhibiting performance if activity is has been suspended for seven (7) days or more. Additionally, this project's completion is 11 days past the deadline specified by the RWQCB in their Notice of Violation (NOV). The County is taking over this project and will complete the required work with a private contractor to ensure its completion in a timely manner and in full compliance with the RWQCB.

We expect this work to begin Tuesday, October 17, 2023. Full cooperation with your staff is necessary during this project's completion.

Further details on this project will be shared with you in the coming days.

Please contact me if you have any questions.

Carlyle

Carlyle A. Johnston
Project Leader

SANTA BARBARA COUNTY

**Resource Recovery &
Waste Management Division**

Innovative Environmental Solutions



805 882 3617

ATTACHMENT B
Health and Safety Incident Reports



Employee Incident Report

Reported By: Gerardo Pinales Jr

Title/Role: Environmental Compliance and Safety Manager

Incident Number: 082823001

Date of Finalized Report: August 30th, 2023

Date of Incident: August 28th, 2023

Time of Incident: 06:24

Employee Name(s): Heriberto Moreno

Employee Role: Loader Operator

Location: 14470 Calle Real Goleta, CA 93117 Anaerobic Digestion Facility (ADF), Digester Hallway

Police Report Reference Number: N/A

Name/Role/Contact of Parties Involved:

1. Apolinar Flores (Mustang RPV LLC.)
2. Abelardo Melgoza (Mustang RPV LLC.)

Name/Role/Contact of Witnesses Involved: None. Camera footage of the incident.

Incident Description:

On 8/28/23 at the Tajiguas Landfill Anaerobic Digester Facility, at approximately 06:24 Heriberto Moreno of Mustang RPV LLC. staff was executing his standard practice of moving digestate out from fermentor chambers. Specifically, as a loader operator at fermentor #14. After unlocking and opening the primary fermenter door with the assistance of Mr. Apolinar Flores, the residual percolate was released from the chamber that was caused by a clogged fermentor drain. This caused the hallway to flood due to the abnormal residual amount. Mr. Moreno then instructed Mr. Flores to retreat from the work area over the concern of Mr. Flores' off-gassing exposure. Mr. Flores did not have a respirator on hand at the time of the hallway flooding. Once Mr. Flores removed himself from the work area of the fermentor door, Mr. Moreno then proceeded to remove the secondary 'gate' by himself. Once the gate was lifted, he moved north bound up the hallway. In this motion, the door was being lifted with the loader bucket and the fermentor gate door struck the fully recessed aerial lift that was placed in the hallway. The lift was up alongside and between fermentor doors 8 and 9 at the time of the

incident. Once the collision happened, the operator backed up in the south direction and avoided the lift. He then proceeded to place the gate along the east wall on the east side of the hallway and continued with his standard work practice. No other work was being executed in the immediate area of the incident and no personnel of any involved party were harmed/injured during the incident.

Employee Statements:

Heriberto Moreno: On 8/28/23 around 15:30 Mr. Moreno was asked to come to the ADF operations office to discuss the incident. Upon inquiry of the events that transpired earlier that morning, Mr. Moreno explained how upon opening the primary fermenter door, he was overwhelmed by the flooding water from the fermenter into the hallway. He expressed how this flooding event caused a change of thought process that made him respond immediately to the safety concerns of Mr. Apolinar Flores, his assisting personnel with the task at hand. As explained, he then forgot about the placement of the aerial lift as he lifted and hauled the fermentor gate. Once in motion, he stated his focus was on not colliding with the decompacter in his left peripheral view. This is when he said he felt the collision of the gate and aerial lift and immediately stopped to prevent further damage.

Abelardo Melgoza: On 8/28/23 around 16:00, Mr. Melgoza was asked to come to the ADF operations office to discuss the reason for the aerial lift being left in the digester hallway. Mr. Melgoza was the last operator to utilize the aerial lift coinciding with the task of using the lift to reach electronic devices located around the perimeter of the fermenter door. A contractor for SCADA consulting by the entity name 'SPICE Integration' was on site Friday 8/25/23 for the reason of troubleshooting various door switches. Mr. Melgoza was instructed to facilitate SPICE personnel in executing this task. Mr. Melgoza stated the aerial lift was left in place over the weekend and was not removed from the facility's hallway due to mechanical issues. He then relayed how the machine was "giving out" several times as they were performing their work.

Inspection Findings of Incident:

The lift was struck around the operator's basket. The left side 'guardrails' of the basket suffered sufficient damage. Other discovered damages to the lift include 'power track hose', 'cable carrier' and steel attachment brackets at the connection points. All of which are between the primary extension arm and auxiliary articulating arm. The lift currently remains in the same position due to the inability to safely operate the lift. The lift itself was also found to be subpar in regards to safety requirements. Further, the lift in its entirety, is painted black with no reflectors present anywhere on the equipment. After visiting the location of the incident, a concern arose over the visibility in the

surrounding environments. The lift and immediate surroundings were not coned or barricaded off. The area has always been deemed a low-light area and works have been in order to retrofit the light fixtures with the goal of increased brightness and visibility. Upon inspection of the loader, the main headlights were found to be non-functional along with the rear running and brake lights. It should be noted, in the time leading up to the incident Mr. Moreno raised concern several times over a non-operating front windshield wiper on the loader involved. This issue was noted and not immediately resolved due to a vendor account being put on hold and the spare parts were not obtained. In further analysis, the wiper blade motor was found to be non-operational by a manufacturer approved mechanic.

Resolution Actions, Plans or Recommendations:

As it stands, the standard work practice should be amended to reflect a 'buddy system' when opening fermentor doors. This is due to the strenuous nature of the task when attaching the fermentor gate. Also, the high probability of being exposed to higher concentrations of gasses created during the fermentation process that can reside in the chamber and digestate which would then be released into the immediate proximity of personnel executing the task. In this case, the residual percolate was an added hazard for potential off-gassing. Through the inspections, there were several unsafe actions in the work practice which took place during this incident. The loader operator should have waited for supplemental help to return to the work area with proper personal protective equipment. After this is when the spotter on the ground and loader operator should have worked in tandem upon opening the fermentor door and gate. The last operator of the aerial lift should have barricaded or coned the work area off prior to commencing task execution. After the failure of the lift, the leaving of the lift should have been reported to management or supervisory personnel since it could not be returned to its designated storage space. With all the variables and factors at bay, this incident was not the direct result of any singled individuals actions with the exception of damage to the aerial lift. The result of numerous unsafe work practices by various personnel allowed for this incident to occur. All necessary involved staff have been updated with amended work practices to ensure their safety and those around them.

Heriberto Moreno
Employee/
Loader Operator

Heriberto Moreno
8/30/2023

Gerardo Pinales Jr
Environmental Compliance
& Safety Manager

Gerardo Pinales Jr
8/30/2023

Dylan Ellis
Plant Manager/
HR Representative

Dylan Ellis
8/30/23



Employee Incident Report

Reported By: Gerardo Pinales Jr

Title/Role: Environmental Compliance and Safety Manager

Incident Number: 091923001

Date of Finalized Report: September 26th, 2023

Date of Incident: September 19th, 2023

Time of Incident: 13:17

Employee Name(s): Apolinar Flores, Francisco Lopez

Employee Role: Loader Operator (Flores), Laborer (Lopez)

Location: 14470 Calle Real Goleta, CA 93117 Compost Management Unit (CMU), Deck

Police Report Reference Number: N/A

Name/Role/Contact of Parties Involved:

1. Marco Duarte (Mustang RPV LLC.)

Name/Role/Contact of Witnesses Involved: Camera footage of the incident.

Incident Description:

On 9/19/23 at the Tajiguas Landfill Compost Management Unit, around approximately 13:17, Apolinar Flores of Mustang RPV LLC. staff was executing his standard practice of 'bulk turning' compost stockpiles on the CMU deck. In specific, as a loader operator between the 2" stockpile and unscreened stockpile. Francisco Lopez, of Mustang RPV LLC. staff, was acting as a laborer when he was assigned with refueling the 'power screen' per Marco Duarte, the CMU Deck Manager. Mr. Lopez was driving the 'fuel truck' to execute his task. Upon driving onto the CMU deck, he followed the west drive path, then shortly after turned south in between the 2" stockpile and unscreened stockpile. Mr. Lopez stopped immediately after making this turn south. Mr. Flores was working in between the same stockpiles further south in the drive path with his bucket orientated south. It was at this time that Mr. Flores reversed with his loader and hit Mr. Lopez in the fuel truck. The collision was acknowledged. Mr. Flores then drove forward in the loader and created separation. Both drivers stepped out of their vehicles and established contact. Shortly after, Mr. Lopez then drove the fuel truck further south down the drive path towards the power screen overs bunker. Mr. Flores left his loader in place. Dylan Ellis, the Plant Manager, and Gerardo Pinales Jr, the Environmental Compliance and Safety Manger, were then notified over radio of the incident and arrived

on the scene at 13:22. No personnel of any involved party were harmed/injured during the incident.

Employee Statements:

Apolinar Flores (Loader Operator) : In his statement, Mr. Flores highlighted the practicality of stopping in the loader, back-up sensors and rear view camera. He spoke of the loader not being able to stop on a dime, the sensors not going off and a continuous singular beep from the loader throughout the action of reversing. Mr. Flores stated he looked over both shoulders just prior to the fuel truck's arrival between the stockpiles. What was also stated was the noise awareness being greatly diminished inside the operator's cabin.

Francisco Lopez (Laborer/ Fuel Truck Operator) : In his statement, Mr. Lopez spoke of not making full contact with the operator as he did not see him turn back. He then spoke of honking once he noticed the loader was heading towards him and how this was followed by the failed attempt to change gears and place the fuel truck into reverse.

Inspection Findings of Incident:

Upon arrival by supervisory personnel, all staff was found to be safe. The loader remained mostly unaffected with scarce cosmetic damage, while the fuel truck suffered sufficient damage to the front end. In review of the camera footage, the simultaneous motions of the reversing of the loader and the stopping of the fuel truck were confirmed. The time elapsed from this moment to the moment of collision was 5 full seconds. Through further inspection the fuel truck operator was found to not have announced his presence on the CMU deck. The fuel truck was found not possessing a strobe or visibility 'whip'.

Resolution Actions, Plans or Recommendations:

The incident resulted with a seize of all ADF plant activity and impromptu safety meeting by all Mustang Staff led by Dylan Ellis and Gerardo Pinales Jr. The result of numerous unsafe work practices by several involved personnel allowed for this incident to occur. The fuel truck should not have been assigned to be on the deck during hours of heavy traffic and operation. The fuel truck operator should have announced his presence on the CMU deck to incite awareness. The loader operator should have looked over his shoulder throughout the entirety of his reversing, with the exception of regarding his side view mirrors and rear-view camera. All necessary staff have been updated with amended work practices to ensure their safety and those around them.

Apolinar Flores

Francisco Lopez

Employee/
Loader Operator



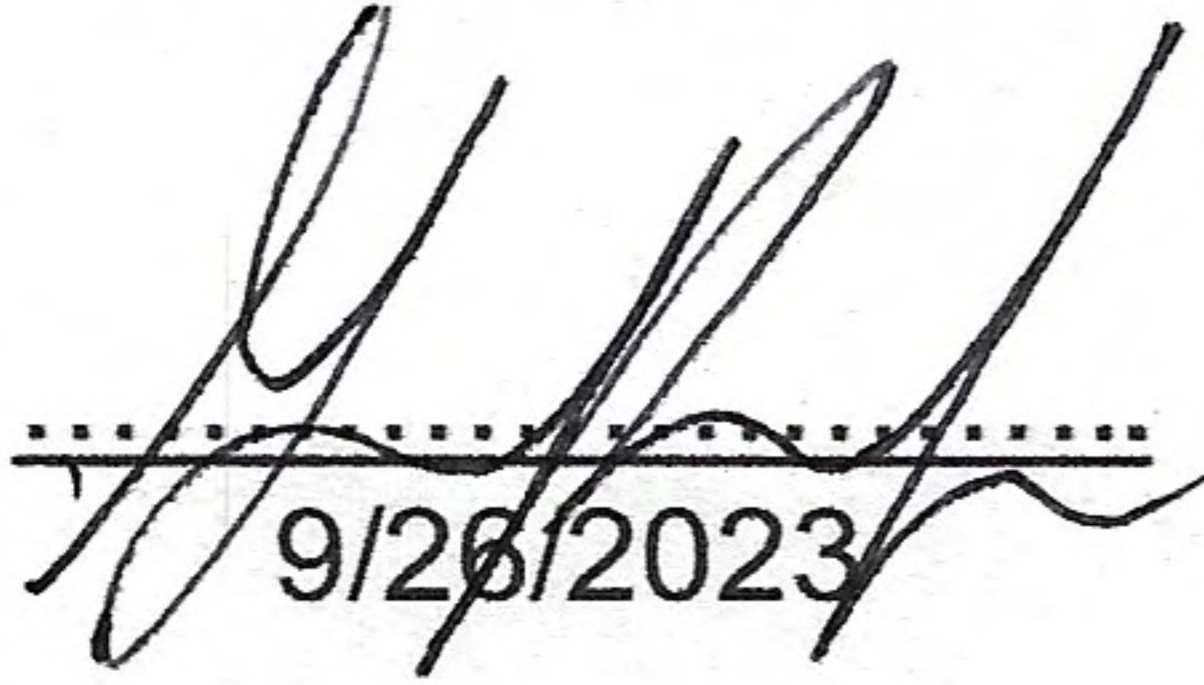
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9/26/2023

Employee/
Laborer

Francisco Lopez

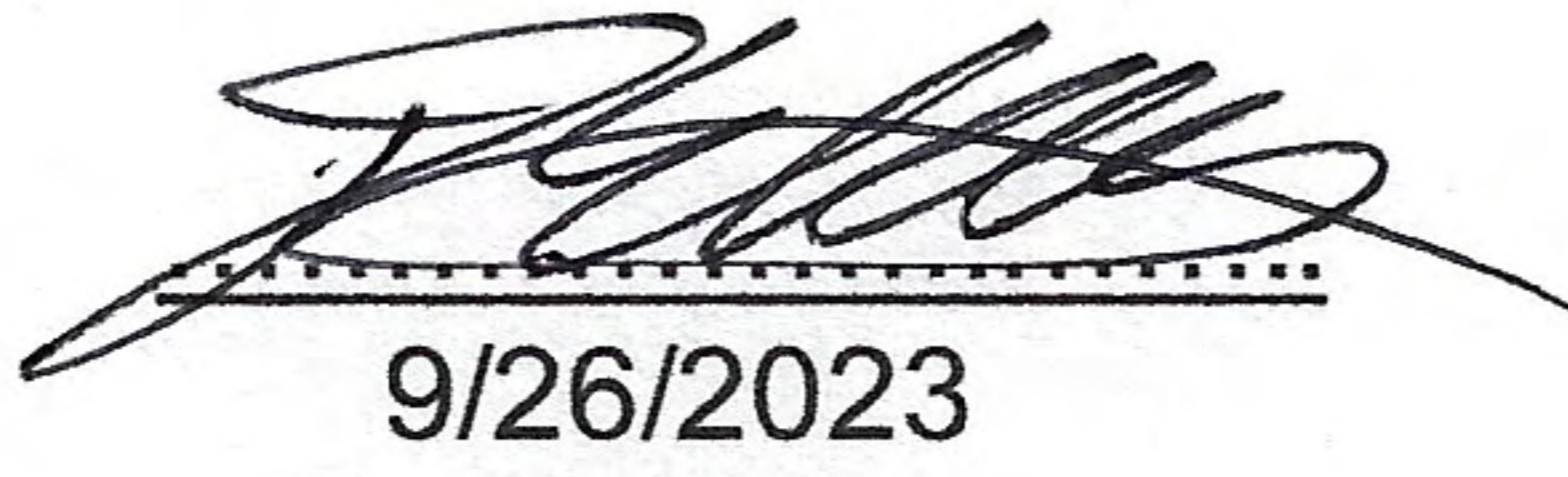
.....
9/26/2023

Gerardo Pinales Jr
Environmental Compliance
& Safety Manager



.....
9/26/2023

Dylan Ellis
Plant Manager/
HR Representative



.....
9/26/2023

Jeanette Gonzales-Knight

From: Barcelona, Shannon
Sent: Tuesday, June 13, 2023 5:10 PM
To: john@deweygroup.com
Cc: Gonzales-Knight, Jeanette; Spier, Travis; Wilder, Marty; Johnston, Carlyle; Milligan, Gregory; Menzies, Jonathan; Dimock, Ed; McGolpin, Scott; Hagen, Julie
Subject: Notice of Health & Safety Violations & Opportunity to Cure for the Tajiguas Resource Recovery Project
Attachments: MSB H S Itr Final.docx; Image.jpeg; 46.jpg; 24.jpg; 12.jpg; 48.jpg; 25.jpg; 26.jpg; 69.jpg; 10.jpg; 33.jpg; 80.jpg; 21.jpg
Importance: High

Hi John,

Please review the attached notice of Health and Safety Violations that were noted at our recent tour of the ADF.

Please have these violations corrected within 15 days.

The additional violations regarding the Hazcom labeling on the chemical storage tanks has been addressed with Diani in a separate communication.

If you have any question, please contact me.

Thank you,

Shannon Barcelona
Santa Barbara County Public Works
Safety, Disability, and Risk Manager
123 E. Anapamu Street
Santa Barbara, CA 93101
(805) 568-3307



**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

123 East Anapamu Street
Santa Barbara, California 93101
(805) 568-3000



SCOTT D. MCGOLPIN

Director

*John Dewey, CEO & Managing Member
MSB Investors, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Email: john@deweygroup.com*

[US mail and emailed]

Subject: Notice of Health and Safety Violations and Opportunity to Cure for the Tajiguas Resource Recovery Project

Mr. John Dewey,

This letter is to bring to your attention the following Health & Safety deficiencies of MSB Investors, LLC (MSB) under the Agreement between MSB and the County of Santa Barbara (County) for the Development and Operation of the Tajiguas Resource Recovery Project (Project), also referred to as the ReSource Center. The performance issues include failure to ensure the health and safety of all personnel working and persons visiting the Project site, in accordance with Section 5.7, and are listed but limited to the itemized deficiencies below. Pursuant to Section 14.2.B, MSB is required to commence the cure within 2 days of receipt of this letter and complete the cure within 15 days.

The following is a list of defaults observed at the ReSource Center on May 30, 2023:

1. Signs stating “No Parking Anytime Emergency Vehicle Access” in the fire access lanes and “no parking anytime” should also be placed in access lane, in the turnaround area, and by the hydrants at the Anaerobic Digestion Facility (ADF) in accordance with the attached County *Fire Apparatus Access* standard.
2. Per your statement on 06/08/2023, the storage tanks containing CMU runoff and ADF percolate that are blocking access to hydrants and fire lanes will be moved no later than 06/14/2023.
3. Only 1 mounted fire extinguisher was observed at the ADF, however, the tag was torn and inspection/recharge date was accessible; and 1 extinguisher was observed on the ground and not suitably charged. These must be addressed in addition to adding at least 2 more mounted extinguishers on the front/side of the ADF, 1 on the back side of the ADF, and 1 on top of the ADF near the entrance.
4. The truck and loader that were parked in the fire turnout lane need to be moved and no vehicles shall be staged in this area impeding emergency Access. No Parking signage must be posted.
5. An unauthorized employee breakroom / area was observed blocking fire access and cannot be constructed without County approval.

AA/EEO Employer

Julie A. Hagen, Deputy Director

Chris Sneddon, Deputy Director

Leslie Wells, Deputy Director

Walter Rubalcava, Deputy Director

Aleksandar Jevremovic, County Surveyor

**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

123 East Anapamu Street
Santa Barbara, California 93101
(805) 568-3000



SCOTT D. MCGOLPIN

Director

6. The drum of combustible material that is stored outside of the ADF needs to be placed in a secure location with secondary containment and proper hazardous communication labeling.

The above list of health and safety deficiencies are the most egregious items that were noted during our site visit and need immediate attention, and another letter containing less egregious deficiencies will follow at a later date. Photos captured during the site visit are included for your reference.

Please contact me with questions.

Thank you,

Shannon Barcelona
Santa Barbara County
Public Works Safety, Disability & Risk Manager
(805) 568-3307

Enclosures

AA/EEO Employer

Julie A. Hagen, Deputy Director

Chris Sneddon, Deputy Director

Leslie Wells, Deputy Director

Walter Rubalcava, Deputy Director

Aleksandar Jevremovic, County Surveyor

























**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

123 East Anapamu Street
Santa Barbara, California 93101
(805) 568-3000



SCOTT D. MCGOLPIN

Director

*John Dewey, CEO & Managing Member
MSB Investors, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Email: john@deweygroup.com*

[US mail and emailed]

October 6, 2023

Subject: Notice of Health and Safety Violations and Opportunity to Cure for the Tajiguas Resource Recovery Project

Mr. John Dewey,

This letter is to bring to your attention the following Health & Safety deficiencies of MSB Investors, LLC (MSB) under the Agreement between MSB and the County of Santa Barbara (County) for the Development and Operation of the Tajiguas Resource Recovery Project (Project), also referred to as the ReSource Center. The performance issues include failure to ensure the health and safety of all personnel working and persons visiting the Project site, and failure to ensure safe and orderly vehicular movement, in accordance with Section 5.7, and are listed but not limited to the itemized deficiencies below. Pursuant to Section 14.2.B, **MSB is required to commence the cure within 2 days of receipt of this letter and complete the cure within 15 days.**

It has been noted that you have cured most of the Safety Violations listed in my previous letter referencing the May 30, 2023 site inspection however additional violations were noted on my most recent visit.

The following is a list of defaults observed at the ReSource Center on September 18, 2023:

1. Signs stating “No Parking Anytime Emergency Vehicle Access” in the fire access lanes and “no parking anytime” are posted however there was a vehicle with a pop-up travel trailer towed behind and an Aerial Lift parked in two separate location in front of no parking signs. Pictures are attached. Not only do signs need to be placed, the no parking needs to be enforced. As fire hazards occur, there shall be no delay in providing the necessary fire protection and/or prevention equipment. NOTE: In cases where orders of local jurisdiction are more restrictive, those orders shall prevail. (b) A safe and unobstructed access to all available firefighting equipment shall be maintained at all times. Section 142.3, Labor Code. Reference: Section 142.3, Labor Code.
2. The storage tanks containing CMU runoff and ADF percolate were moved to the CMU deck the tank doors are open on multiple tanks. The tanks need to remain closed when material is inside.
3. The mounted fire extinguisher was observed at the ADF, the tag on the extinguisher shows the last inspection was in 2022. Firefighting equipment shall be inspected and tested, and maintained in serviceable condition. A record shall be kept showing the date when fire extinguishers were last

AA/EEO Employer

**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

123 East Anapamu Street
Santa Barbara, California 93101
(805) 568-3000



SCOTT D. MCGOLPIN

Director

inspected, tested or recharged. Section 142.3, Labor Code. Reference: Section 142.3, Labor Code.

4. A bottle of Diesel Exhaust Fluid that had liquid inside was on the ground outside one of the storage tanks on the CMU deck. Containers of hazardous substances shall not be stored in such locations or manner as to result in physical damage to, or deterioration of the container. Containers shall not be stored where they are exposed to heat sufficient to rupture the container or cause leakage, Section 142.3, Labor Code. Reference: Section 142.3, Labor Code. Group
5. Tarps are on the deck, creating a potential snake/rodent hazard. The employer must provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces. [1910.22\(c\)](#) *Access and egress*.
6. Storage container doors are left open and debris is blowing out.
7. The lights inside the digester are not adequate, you cannot clearly see vehicles or people who may be working inside. You recently had a Loader vs Aerial lift accident inside the facility, it was also noted that the Aerial Lift involved in the accident was black with no reflectors or lights on it, the use of this vehicle inside a poorly lit area is clearly a contributing factor of the accident. (a) Working areas, stairways, aisles, passageways, work benches and machines shall be provided with either natural or artificial illumination which is adequate and suitable to provide a reasonably safe place of employment. b) When adequate natural illumination or permanent artificial illumination cannot be made available to secure the safety of employees, suitable portable lights shall be provided. (c) Skylights, side windows, lamps, and other light accessories which provide necessary illumination shall be kept sufficiently clean, adjusted, and repaired so as not to impair the illumination required for the safety of employees. Minimum illumination levels for safety alone are listed for various typical areas in Table IL-1. (Title 24, Part 2, Section 512, Table 5-C.)
8. A large battery was stored on the Aerial Lift exposed to the elements. Containers of hazardous substances shall not be stored in such locations or manner as to result in physical damage to, or deterioration of the container. Containers shall not be stored where they are exposed to heat sufficient to rupture the container or cause leakage, Section 142.3, Labor Code. Reference: Section 142.3, Labor Code.
9. A No Parking/Emergency Vehicles only sign has yet to be placed on the fire access/turn around area. This was a requirement in the May 30th letter and has yet to be cured. The employer shall be responsible for the development of a fire protection program to be followed throughout all phases of the construction work; and he shall provide for the firefighting equipment as specified in this Article. As fire hazards occur, there shall be no delay in providing the necessary fire protection and/or prevention equipment. NOTE: In cases where orders of local jurisdiction are more restrictive, those orders shall prevail. (b) A safe and unobstructed access to all available firefighting equipment shall be maintained at all times. Reference: Section 142.3, Labor Code.
10. The Hazcom label is faded and peeling on a barrel of material that could not be identified. This was a requirement in the May 30th letter and has yet to be cured. An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside

AA/EEO Employer

**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**

123 East Anapamu Street
Santa Barbara, California 93101
(805) 568-3000



SCOTT D. MCGOLPIN

Director

packaging. Authority cited: Sections 50.7, 142.3 and 6398, Labor Code. Reference: Sections 50.7, 142.3 and 6361-6399.7, Labor Code; Sections 25249.6, 25249.7, 25249.8, 25249.10, 25249.11, 25249.12 and 25249.13, Health and Safety Code.

11. CMU run-off / wastewater is being transported from the CMU Run-off Storage Tank to the ADF Percolate Tank by allowing the outflow from a pipe above the ADF doors to hit the ADF tipping area and drain into the ADF sump, potentially exposing employees and visitors entering the ADF to come in contact with untreated wastewater.
12. The entire facilities housekeeping is poor, there are piles of used parts, trash, and other items left in piles throughout. There is garbage and debris blowing up and down the hillside. Dumpsters located on the CMU deck have been left to sit long enough for foliage to start to grow on top of the contents of the container.
13. The ADF fire suppression system is corroded and leaking in four locations. (2) If for any reason a fixed extinguishing system becomes inoperable, the employer shall notify employees and take the necessary temporary precautions to assure their safety until the system is restored to operating order. Any defects or impairments shall be properly corrected by trained personnel. Section 142.3, Labor Code

The above list of health and safety deficiencies were noted during our site visits and require immediate attention. In addition to items noted above, a vehicular accident occurred on September 19, 2023 between a refueling truck and CMU loader. An incident report documenting the incident was received on September 26, 2023 and is being reviewed, however we require that all accidents/incidents are reported to us and this has not been the case on previous accidents at the facility.

Photos captured during the site visit are included for your reference.

Per article 5 of your contract, please provide a copy of your Employee Health & Safety Plan Handbook, verification of OSHA/Cal OSHA training for your staff and verification of staff safety training, and copies of your monthly IIPP site inspections.

Please contact me with questions.

Thank you,

Shannon Barcelona

Shannon Barcelona
Santa Barbara County
Public Works Safety, Disability & Risk Manager
(805) 568-3307

Enclosures

AA/EEO Employer

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**S.B.C.O. PUBLIC WORKS
RESOURCE RECOVERY AND
WASTE MANAGEMENT DIVISION
130 EAST VICTORIA STREET, SUITE 100
SANTA BARBARA, CA 93101-2018**

Attn: Jeanette Gonzales-Knight

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**John Dewey,
CEO & Managing Member
MSB Investors, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA
92660**



9590 9402 7610 2122 7909 97

2. Article Number (Transfer from service label)

7019 1120 0001 0375 7914

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

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- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	
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 Street and Apt. No., or PO Box No. 17 Corporate Plaza, Suite 200
 City, State, ZIP+4® Newport Beach, CA 92660

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions











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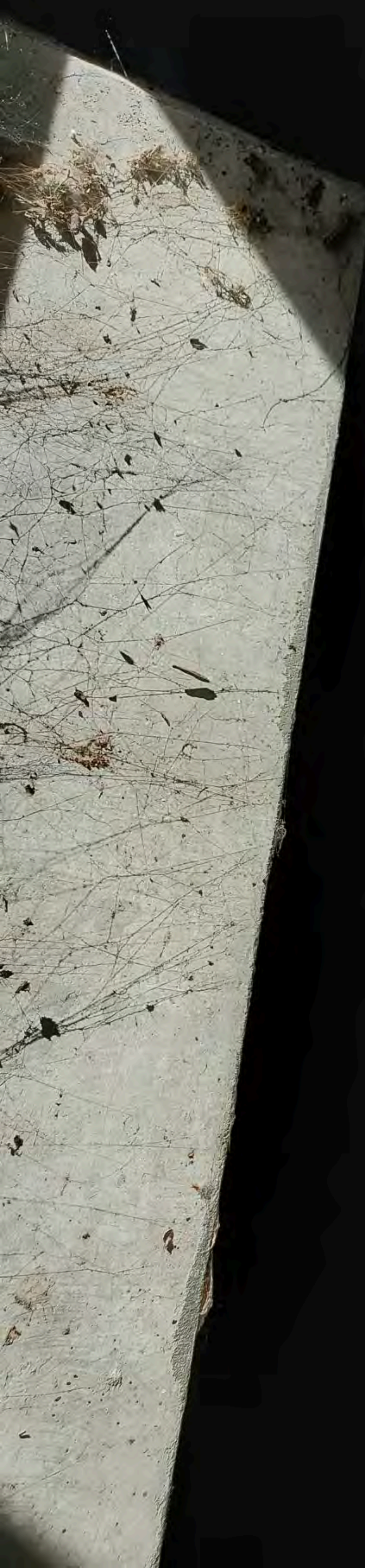
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NO SMOKING





NO
PARKING
FIRE
LANE



NO
PARKING
FIRE
LANE



JOHN KULAR CONSULTING

May 23, 2022

Jordan Haserot
RWQCB Region 3
895 Aerovista Place
San Luis Obispo, CA 93401

Re: Incident Report – Compost Fire
Tajiguas Resource Center Compost Management Unit
14470 Calle Real, Gaviota, CA 93117
Permit R3-2020-012
Geotracker ID T10000017039

Dear Jordan:

The following report describes the occurrence and remedial actions per the format of WDR General Order WQ 2015-0121-DWQ, Attachment B, Section 3- Priority Reporting of Significant Events.

- a. Event Details -The compost fire was discovered at 6:20 p.m. on May 12, 2022 by landfill personnel after Composting Management Unit (CMU) staff had departed for the day at 5:45 p.m. The location of the fire was the northeast corner of the CMU deck near the compost screening equipment. The CMU staff returned to the site to assist Santa Barbara County Fire, US Forestry Fire Service and landfill staff with separating unburnt compost from burning compost and extinguishing the fire with a combination of the ADF fire protection water system and landfill dust control watering trucks. The fire was declared completely extinguished at approximately 6:15 a.m. on May 13th.

Damages – Approximately 1,000 CY of compost was burned. The Doppstadt compost screen was destroyed. The compost residue bin was fire damaged and require repainting. A 55-gallon hydraulic fluid storage tank was damaged but did not leak. It shall be properly disposed of offsite. Burning embers ignited and destroyed approximately 50 linear feet of corrugated HDPE storm drain located offsite, southeast of the CMU pad. The melting storm drain also damaged adjacent landfill gas condensate pipes. Initial reports were that the asphalt CMU pad surface was undamaged by the fire. This was confirmed by a licensed civil engineer (the undersigned) on May 23, 2022.

- b. Event Cause – The cause of the fire was presumed to be heat from the diesel-fueled compost screener; Doppstadt Model 726 igniting compost residue remaining near the screen at the end of the screening process which occurred at approximately 2:30 p.m. on May 12th. The screen operator advised that he had cleaned compost residue around the screen for 1 hour following its operations. The compost near the fire source was in a dry condition because it was mature and had been screened in preparation for additional

890 Lindamere Ct.
Simi Valley, CA 93065
661.302.1292

www.kularconsult.com

screening and export the following day. Ambient relative humidity when the fire started was 10% with wind gusts to 20 mph.

- c. Water Use and Runoff – The source of the fire suppression water was unchlorinated well water provided by the landfill watering trucks (estimated as approximately 50,000 gallons) and chlorinated stored well water provided by the adjacent ADF water storage tank (calculated to be 16,135 gallons). Due to the dry condition of the mature compost, most of the applied water was absorbed by the compost or vaporized by the fire. 100% of the fire water runoff was intercepted by the CMU drainage system and contained in the Baker Tanks. The contained fire water runoff was calculated to be 8,873 gallons. Most of the discharge to the Baker Tanks occurred at 10:30 a.m. as the CMU staff continued to wet down the compost windrows. Before the fire started the Baker tanks were 36 % full and CMU Stormwater tank was 38 % full. The remaining available stormwater storage post fire was 17,893 gallons in the Baker tanks and 235,583 gallons in the CMU Stormwater Tank.
- d. Precipitation - There was no precipitation on May 12 or 13th or any of the preceding 7 days.
- e. Water Quality - The pH of the runoff collected in the Baker Tanks was 7.0, recorded on May 16th. Since no discharge from the site occurred, no samples were taken or tested. Ryan Lodge of RWQCB Region 3 confirmed that sampling was not required on May 18th in conversation with Jeanette Gonzales-Knight of SBC Public Works.
- f. Period of Non-Compliance – The CMU windrows were reconstructed and returned to normal operation between May 13 and May 18, 2022. Compost screening resumed with the remaining undamaged electric-powered Doppstadt screen on May 19, 2022.
- g. Corrective Actions and Schedule – Additional fire suppression water pressure has been recommended by County Fire and is anticipated to be implemented within the next 60 days. Additional compost residue cleaning procedures around all screens operated during the day including a 2nd operator check prior to shift end was implemented on May 19th. Replacement of the damaged diesel screen with an electric screen is under consideration.
- h. Laboratory Analyses – Not Applicable

Please contact the undersigned at johnkularpe@gmail.com or 661-302-1292 if you require any further information. Thank you for your consideration.

Sincerely,


John Kular, P.E.
President
John Kular Consulting



5/23/22

JOHN KULAR CONSULTING

Attachments: SCADA Exhibits of tank levels

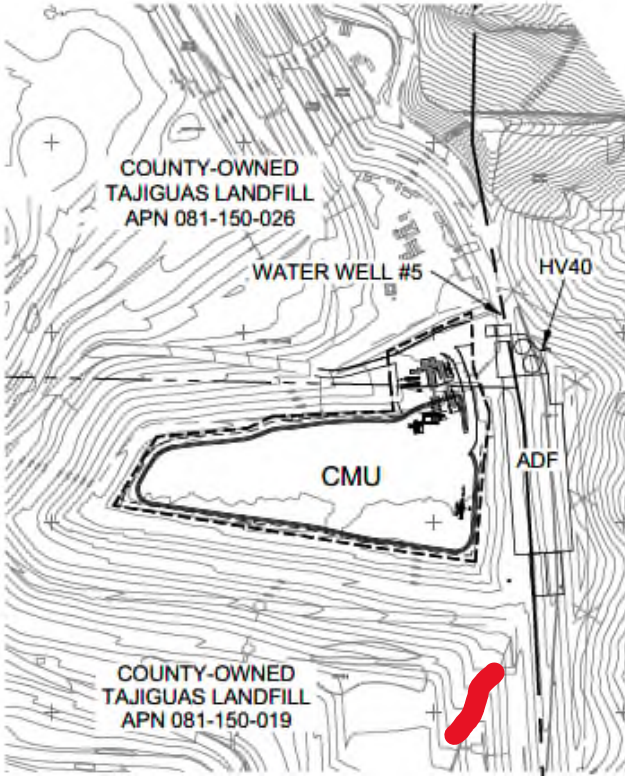


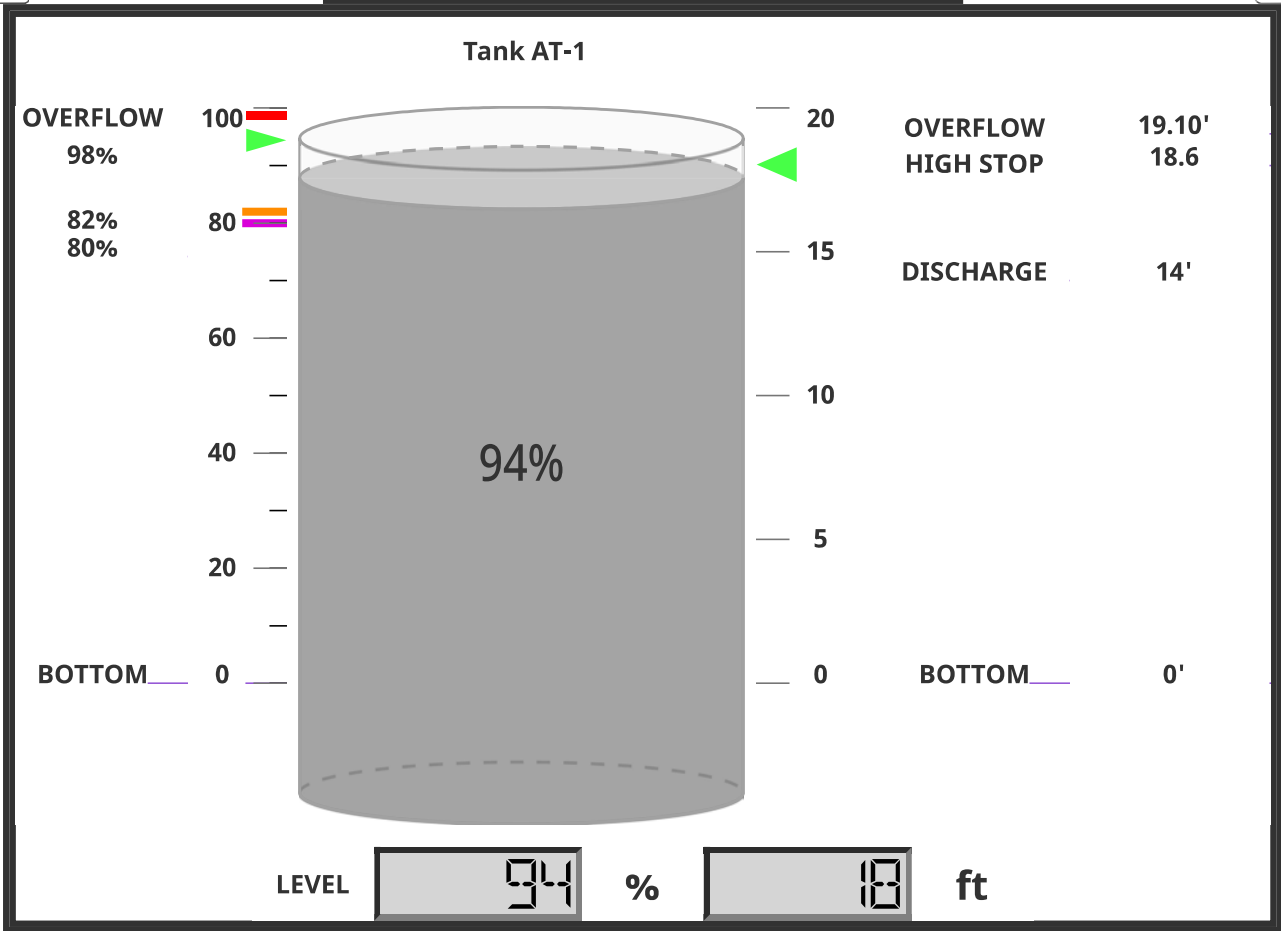
Figure 1- Locations of Fire Damaged Storm Drain

HOME

ALARM

ADF POTABLE TANK

Water Sys Menu

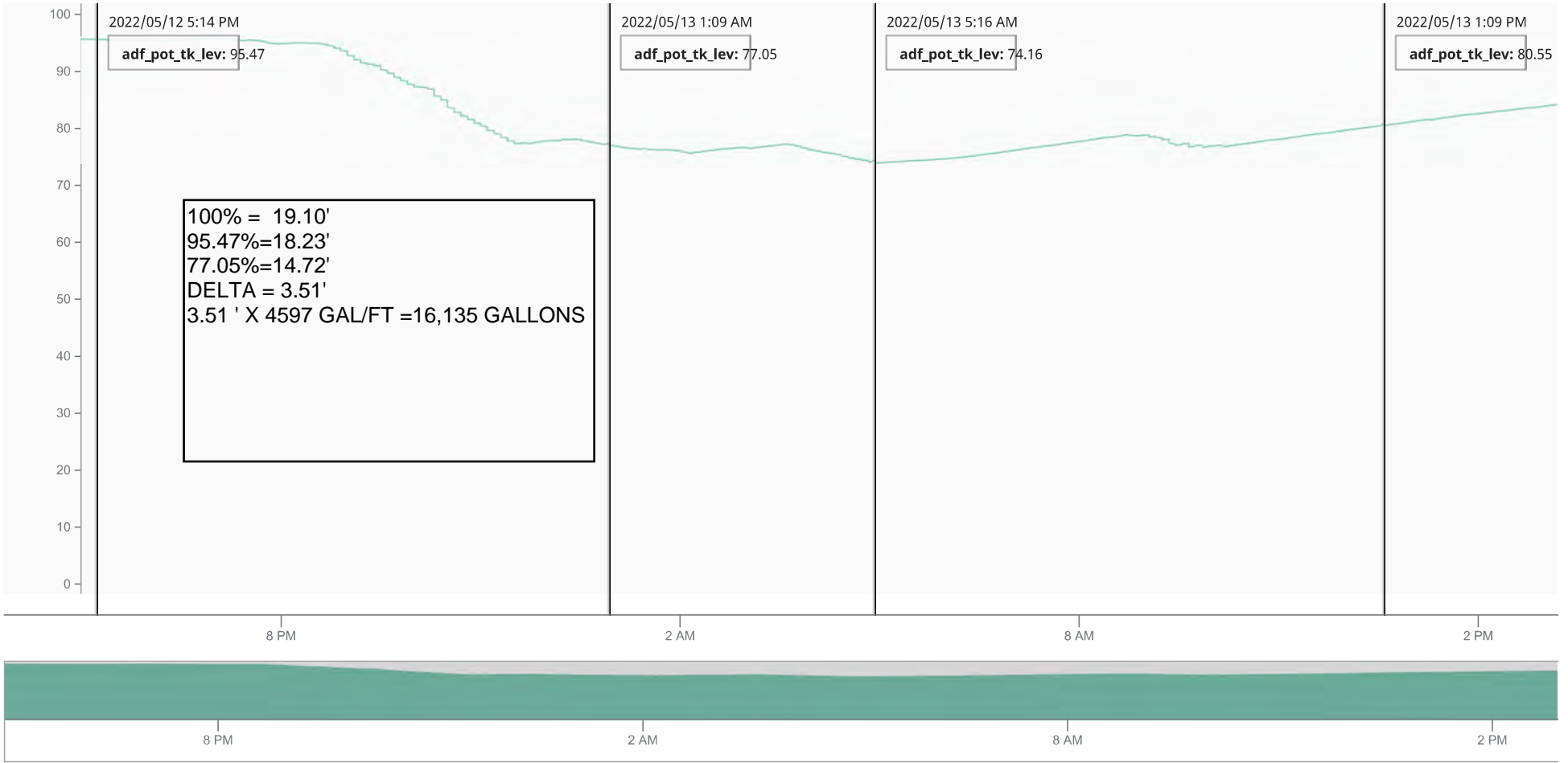


POTABLE TANK SETPOINTS	VALVE STATUS
HIGH SETPOINT	OPEN
97	CLOSED
LOW SETPOINT	
95	

EXHIBIT A - POTABLE & FIRE WATER TANK



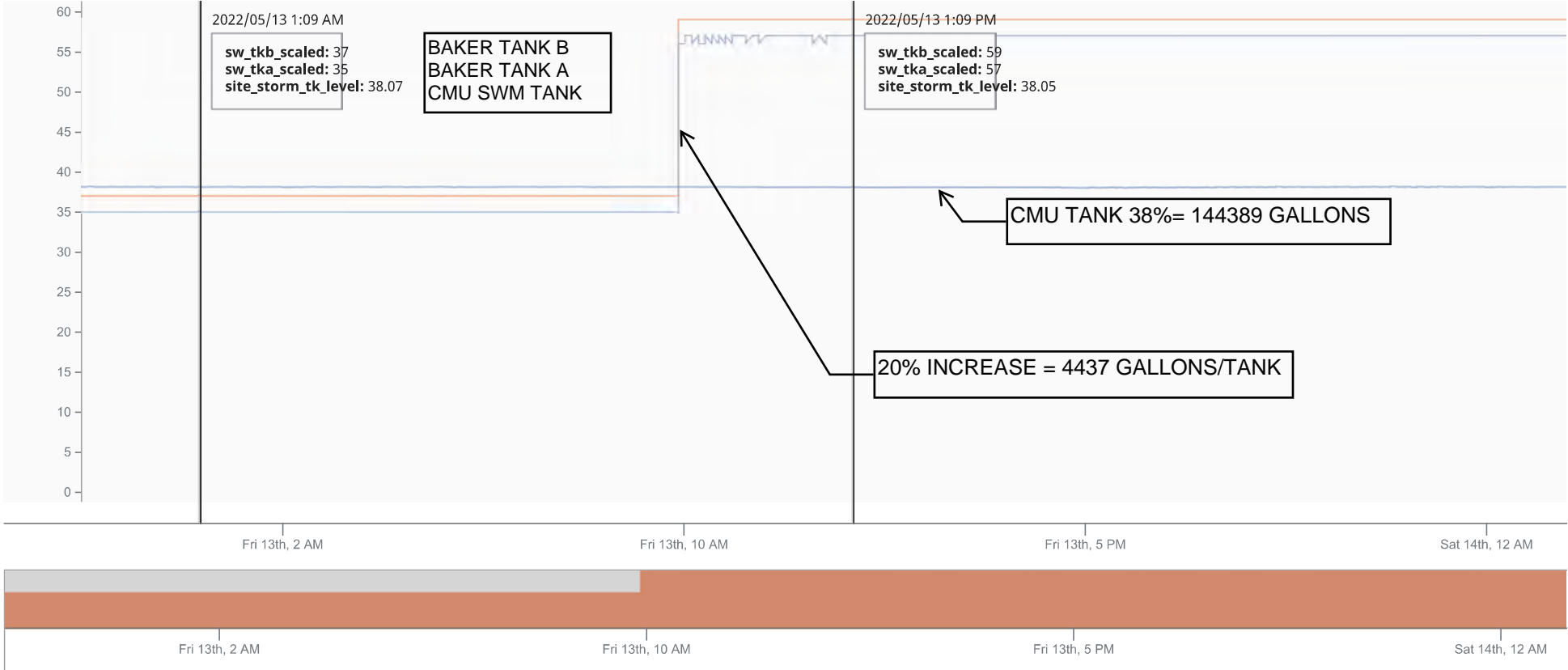
2022/05/12 5:00 PM - 2022/05/13 11:59 PM



Pen Name	Minimum	Maximum	Average	Axis	Plot
<input checked="" type="checkbox"/> adf_pot_tk_lev	73.96	95.73	83.95	Default	0

EXHIBIT B - FIRE WATER TANK STATUS
MAY 12 - MAY 13, 2022

2022/05/12 11:00 PM - 2022/05/14 11:59 AM



Pen Name	Minimum	Maximum	Average	Axis	Plc
<input checked="" type="checkbox"/> sw_tkb_scaled	37	59	52.44	Default	0
<input checked="" type="checkbox"/> sw_tka_scaled	35	57	50.42	Default	0
<input checked="" type="checkbox"/> site_storm_tk_level	37.95	38.17	38.09	Default	0

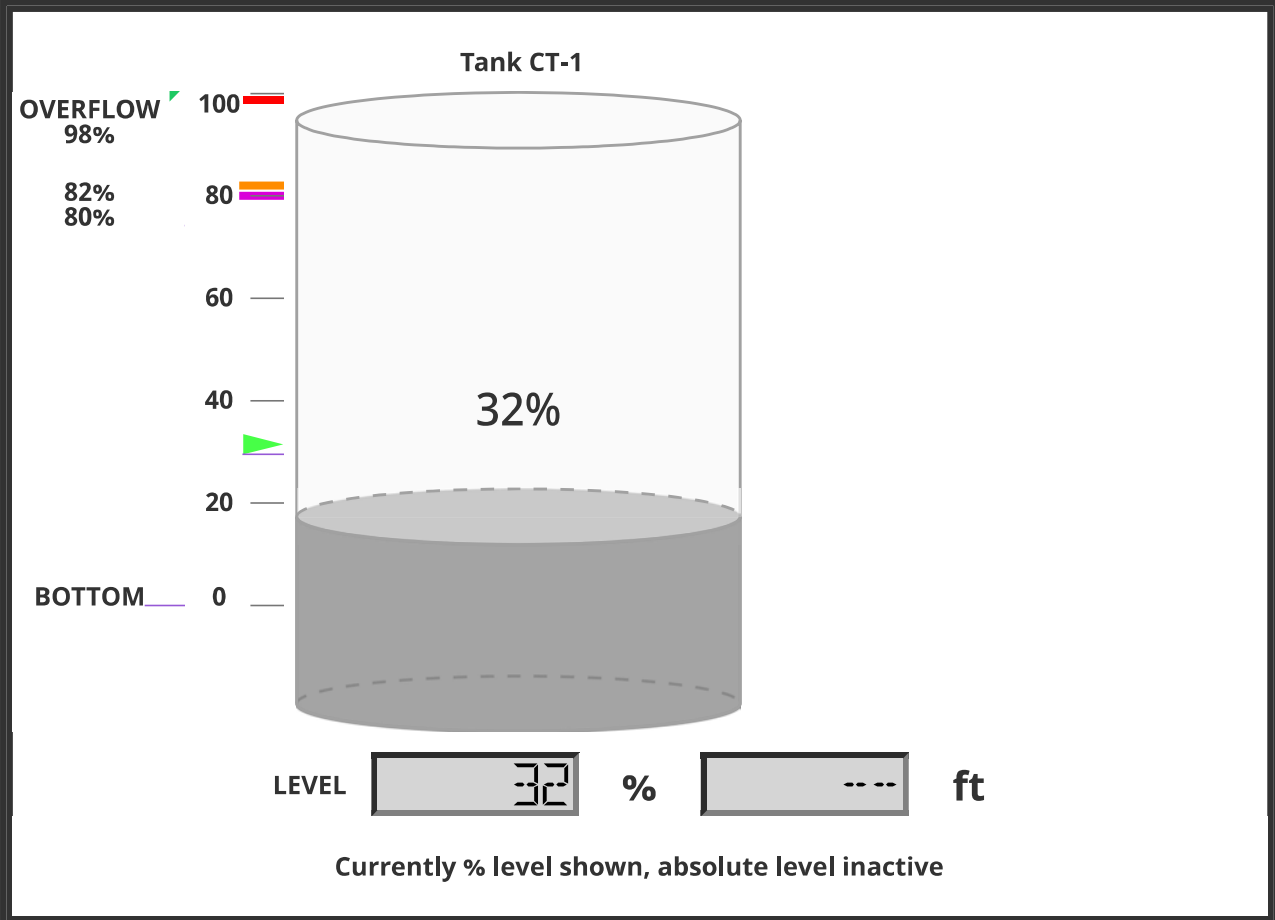
EXHIBIT C - STORMWATER STORAGE CHANGES
MAY 12 - 13, 2022

HOME

ALARM

Site Stormwater Tank CT-1

Waste Water Menu



STORMWATER TANK SETPOINTS	YEARLY TOTALS
HIGH SETPOINT	Gallons
LOW SETPOINT	<input type="text" value="---"/>



ATTACHMENT C
Notices of Violations



Environmental Health Services

225 Camino del Remedio ♦ Santa Barbara, CA 93110
805/681-4900 ♦ FAX 805/681-4901

Daniel L. B. Nielson, MPA *Interim Director*
Suzanne Jacobson, CPA *Chief Financial Officer*
Palge Batson, MA, PHN, RN *Deputy Director*
Darrin Eisenbarth *Deputy Director*
Dana Gamble, LCSW *Deputy Director*
Dr. Noemi Doohan *Medical Director*

2125 S. Centerpointe Pkwy. #333 ♦ Santa Maria, CA 93455-1340
805/346-8460 ♦ FAX 805/346-8485

Lars Selfert *Director of Environmental Health*

VIA ELECTRONIC MAIL

NOTICE OF VIOLATION

December 1, 2022

Name: Anaerobic Digester Facility (ADF) and Compost Management Unit (CMU) at Tajiguas Resource Recovery Project & Sanitary Landfill (42-AA-0015)

Manager Name: John Dewey

Address: 14470 Calle Real
Goleta, CA 93117

Address: 14470 Calle Real
Goleta, CA 93117

Violation Location: Tajiguas Landfill and Resource Ctr.
14470 Calle Real
Goleta, CA 93117

APN: 081-150-019

Code	Title	Description
Title 14 California Code of Regulations (CCR) § 17863.4	Odor Impact Minimization Plan	Occurrence of odor impacts and failure to implement procedures established in operator's odor impact minimization plan (OIMP).
14 CCR § 17867(2)	Odor Control	Operation of facility, including not following procedures established in operator's OIMP that has been and is creating odor and nuisance conditions off-site.
14 CCR § 17867(3)	Vector/Litter/Hazard/Nuisance/Noise/Dust	Observation of litter in areas surrounding CMU and complaints that litter drifts off-site to Arroyo Quemada Lane and the Pacific Ocean.
14 CCR § 17896.31	Odor Minimization Plan	Operation of facility, including not following procedures established in operator's OIMP that has been and is creating odor and nuisance conditions off-site.
14 CCR § 17896.32	Odor and Nuisance Control	Occurrence of odor impacts and failure to implement procedures established in operator's OIMP.

Warning notice dates of violations, as noted on inspection reports for SWIS Facility Number 42-AA-0015 inspected on: September 21, October 19 and November 2, 2022.

In order to comply with the above-mentioned code sections, you must meet the following compliance schedule:

1. Immediately implement all procedures as described in the facility's Odor Impact Minimization Plan, including sections identified in EHS inspection reports for the November 2, 2022 inspection.

NOV – ADF and CMU operations at 42-AA-0015

December 1, 2022

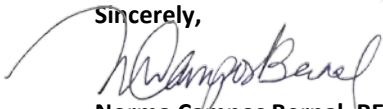
Page 2 of 2

2. Continue implementation of mitigations and schedule as proposed in section E of the submitted November 4, 2022 Odor Best Management Practice Feasibility Study. Environmental Health Services (EHS) is currently consulting with CalRecycle and will formally respond upon completion of review and consultation.
3. Immediately implement procedures to minimize the production of litter from site activities, and complete at least daily site walk-throughs to identify and remove litter.

You may contest this Notice of Violation by providing a written response within the next two weeks (December 15, 2022) to: Norma Campos Bernal at 225 Camino del Remedio, Santa Barbara, CA 93110; NCamposBernal@sbcphd.org.

Failure to comply with above compliance schedule may result in further enforcement action, such as the issuance of a notice and order. Please provide your availability for the next 30 days, to arrange a Compliance Meeting with EHS' Director for plans to resolve the ongoing violations. If you have any questions please contact Norma Campos Bernal at (805) 681-4942.

Sincerely,



Norma Campos Bernal, REHS
Senior Environmental Health Specialist

Cc: Regional Water Quality Control Board
Leslie Wells, Public Works Deputy Director
Jeanette Gonzales-Knight, RRWMD Compliance Manager

Enclosures:

ADF Inspection Report for inspection on November 2, 2022
CMU Inspection Report for inspection on November 2, 2022
ADF Inspection Report for inspection on October 19, 2022
CMU Inspection Report for inspection on October 19, 2022
ADF Inspection Report for inspection on September 21, 2022
CMU Inspection Report for inspection on September 21, 2022

**Compostable Materials Handling Operation and Facility Inspection
Report (93)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
9/21/2022**

Quemada and the Pacific Ocean.

Litter at operations and facilities shall be controlled, and routinely collected to prevent safety hazards, nuisances or similar problems and off-site migration to the greatest extent possible given existing weather conditions.

Actions should be taken immediately to return to compliance with State standards.

14 CCR 17863.4 - Odor Impact Minimization Plan

Failure to comply with OIMP, including following complaint response protocol as noted by recurring odor complaints on the following dates; March 12, 13, 16, April 8 and 23, June 16 and 17, August 5-12 and 26 and September 14-16 and 20. Operator to immediately take additional reasonable and feasible measures to minimize and control nuisance odor impacts offsite.

Based on an odor investigation completed by the LEA consistent with 14 CCR 18302(d), and continuing odor complaints by residents at Arroyo Quemada Lane that have been unresolved through design and operating considerations identified in the facility's Odor Impact Minimization Plan, the operator is directed to prepare and implement an Odor Best Management Practice Feasibility report (14CCR-17896.30) to identify Best Management Practices and develop new odor control methods by no later than November 4, 2022 (within 45 days of this inspection). The Odor Best Management Practice Feasibility Report should include the required elements of 14 CCR 17896.30 (b).

Please refer to attachments for additional information.

Areas of Concern

14 CCR 17868.5(c) - Personnel Training

Two employees at the CMU have not been trained to identify contaminants, unacceptable feedstock, or other hazardous materials that may be present in loads. Operator to ensure facility personnel are adequately trained to perform load

**Compostable Materials Handling Operation and Facility Inspection
Report (93)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
9/21/2022
checking activities, including hazardous material awareness training.**

Inspection Report Comments

Weather: Sunny, 79F and westerly winds at 9 mph

Compost Management Unit (CMU) Monthly Inspection:

-Lab results on compost pathogens was not available due to low stock of compost.

-Noted 18 windrows of compost undergoing curing process on the CMU floor this day.

-Noted a section of the chain link fence was missing and informed by operator that SCS Engineers are in the process of installing new LFG well head, but operator received notification that it would be repaired by the October inspection.

-Operator provided daily temperature monitoring records for middle portion of the windrows at the CMU as well as load check, tonnage reports and updated training records.

-Operator explained that the digester temperatures have been adjusted to a mesophilic temperature (105F), since using thermophilic temps (145F) may have been contributing to the increase in odors.

-LEA responded to odor complaint by conducting an odor survey from Arroyo Quemada Lane in the evening after Tajiguas inspections between 6:30 pm and 7:30 pm. The weather was 69F and clear with a wind at 6 mph in a westerly direction and LEA noticed an odor in the area by the Arroyo Quemada Lane entrance gate which resembled a terpene odor with a musty, stale scent most likely from the green waste area. As I walked down the road I began to notice another odor resembling a more putrid odor most likely from the compost. The green waste odor was unpleasant and the compost odor was more offensive. Both odors were of moderate intensity with a duration that lasted overnight. According to Arroyo Quemada residents the frequency of these odors occur monthly for several days and have been a nuisance since the end of 2021. These odors would interfere with the comfortable enjoyment of life. No other potential odor sources were identified except for operations at Tajiguas Sanitary Landfill and ReSource Center. During the inspection, the LEA was not made aware of any unusual operational changes or atypical feedstocks.

-EHS was first notified of complaints by the reporting party on August 18, 2022 although the operator and facility was made aware several months earlier.

-Provided operator a template for the Odor BMP Feasibility Report template to operator and attached instructions in this report.

Compostable Materials Handling Operation and Facility Inspection Report (93)

Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)

9/21/2022

-Employees must receive training in Hazardous Material Recognition and Awareness.

Notes:

1. Refer to violation from CCR14-Section 17867(a)(3)-Litter
2. Refer to violation from CCR14-Section 17863.4-Odor Minimization Plan
3. Refer to violation from CCR14-Section 17869(c)-Public Complaint
4. Refer to AOC from CCR14-Section 14 CCR 17868.5(c)-Employee Training
5. Provide organics sampling dates for third and fourth quarters, 2022.
6. Repair chain link enclosure.
7. Next Five-Year Review application will be due on February 2, 2027.

Attachments

Odor BMP Instructions

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
9/21/2022

nuisance odor impacts offsite.

Based on an odor investigation completed by the LEA consistent with 14 CCR 18302 (d), and continuing odor complaints by residents at Arroyo Quemada Lane that have been unresolved through design and operating considerations identified in the facility's Odor Impact Minimization Plan, the operator is directed to prepare and implement an Odor Best Management Practice Feasibility report (14CCR-17896.30) to identify Best Management Practices and develop new odor control methods by no later than November 4, 2022 (within 45 days of this inspection). The Odor Best Management Practice Feasibility Report should include the required elements of 14 CCR 17896.30 (b).

Please refer to attachments for additional information.

14 CCR 17896.19 - Biogas Control

As noted by the following communication between the operator and a neighbor, an uncontrolled release of biogas occurred:

"As a result of our transition from thermophilic (high temperature) to mesophilic (low temperature) AD conditions in order to reduce odors, the methane content of the gas increased above 50% last night for the first time since last March exceeding the engine's operating setpoint. This caused an engine shutdown and sent the biogas to the flare.

The flare operated as expected. Unfortunately, a scrubber prior to the flare would only let 2/3's of the biogas through the scrubber due to some material buildup that was discovered this morning. The balance of the biogas was vented."

We are in the process of revising the engine setpoint to accommodate the current methane content of the biogas and performing maintenance on the scrubber to correct that condition so it operates normally."

copied from email correspondence between complainant and John Dewey.

No Areas of Concern

Inspection Report Comments

Weather: Sunny, 79F and westerly winds at 9 mph

Anaerobic Digestion Facility (ADF) Monthly Inspection:

-Noted piles of Source Separated Organics (SSO), Organic Fraction of Municipal Solid Waste (OFMSW) from the

In-Vessel Digestion Operation and Facility Inspection Report (104) Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015) 9/21/2022

MRF.

-Both eye-wash stations and showers were operating adequately.

-Hazardous Material container 5-gallon drum provided in ADF hall, pending start of accumulation date.

-August load checks and tonnage reports were all adequate at this time, but special occurrences were inaccurate and missing complaint information.

-LEA responded to odor complaint by conducting an odor survey from Arroyo Quemada Lane in the evening after Tajiguas inspections between 6:30 pm and 7:30 pm. The weather was 69F and clear with a wind at 6 mph in a westerly direction and LEA noticed an odor in the area by the Arroyo Quemada Lane entrance gate which resembled a terpene odor with a musty, stale scent most likely from the green waste area. As I walked down the road I began to notice another odor resembling a more putrid odor most likely from the compost. The green waste odor was unpleasant and the compost odor was more offensive. Both odors were of moderate intensity with a duration that lasted overnight. According to Arroyo Quemada residents the frequency of these odors occur monthly for several days and have been a nuisance since the end of 2021. These odors would interfere with the comfortable enjoyment of life. No other potential odor sources were identified except for operations at Tajiguas Sanitary Landfill and ReSource Center. During the inspection, the LEA was not made aware of any unusual operational changes or atypical feedstocks.

-EHS was first notified of complaints by the reporting party on August 18, 2022 although the operator and facility was made aware several months earlier.

-Provided a template for the Odor BMP Feasibility Report template to operator and attached instructions in this report.

-Actions should be taken immediately to return to compliance with State standards for controlling off-site litter.

Notes:

1. Refer to violation from CCR14-Section 17896.19-Biogas Control
2. Refer to violation from CCR14-Section 17896.31-Odor Minimization Plan
3. Refer to violation from CCR14-Section 17896.45-Recordkeeping Requirements
4. Provide organics sampling dates for third and fourth quarters, 2022.
5. Next Five-Year Review application will be due on February 2, 2027.

Attachments

Instructions for completing the Odor BMP Feasibility Report
Tajiguas Sanitary LF and Resource Center

Compostable Materials Handling Operation and Facility Inspection Report (93)

Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)

10/19/2022

include the required elements of 14 CCR 17896.30 (b).

14 CCR 17863 - Report of Composting Site Information

-Operator provided estimated volume of finished compost ready for screening to be at 12,000 cubic yards (16,800 tons) which exceeds design capacity cited in JTD Appendix N.

Provide proposal to immediately reduce the current compost volume to be under capacity within design parameters.

Areas of Concern

14 CCR 17867.5 - Personnel Training

Two employees at the CMU have not been trained to identify contaminants, unacceptable feedstock or other hazardous materials that may be present in loads. Operator to ensure facility personnel are adequately trained to perform load checking activities, including hazardous material awareness training.

Inspection Report Comments

Weather: Sunny, 85F and south-easterly winds at 5 mph

Compost Management Unit (CMU) Monthly Inspection:

-Pathogen reduction lab results from October 5, 2022 for finished compost passed for Fecal Coliform and Salmonella.

-Noted 17 windrows of compost undergoing curing process on the CMU floor this day.

-Noted a section of the chain link fence was missing and informed by operator that the fence company has been

Compostable Materials Handling Operation and Facility Inspection Report (93)

Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)

10/19/2022

delayed, but work order is approved and proposed to be completed by next inspection.

-Noted damage to enclosure on ADF facing side. (picture)

-Noted ponding of liquid near clogged drain. (pictures)

-Operator provided daily temperature monitoring records for middle portion of the windrows at the CMU as well as September load checks, tonnage reports and updated training records.

-Provided operator a template for the Odor BMP Feasibility Report template to operator and attached instructions in this report due by November 4, 2022.

-Employees must receive training in Hazardous Material Recognition and Awareness.

Notes:

1. Refer to violation from 14CCR 17863-failure to comply with RCSI (Report of Composting Site Information).
2. Refer to violation from 14CCR 17896.31-Odor Minimization Plan
3. Refer to AOC from CCR14-Section 14 CCR 17868.5(c)-Employee Training
4. Provide organics sampling dates for third and fourth quarters, 2022.
5. Repair chain link enclosure on landfill side and also on ADF side.
6. Unclog the main drain on the CMU floor to drain liquid.
7. Next Five-Year Review application will be due on February 2, 2027.

Attachments

cmu drain clogg
enclosure on LF side and ponding of waste water
secondary damage to CMU enclosure

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
10/19/2022

14 CCR 17896.31 - Odor Minimization Plan

Failure to comply with OIMP, including following complaint response protocol as noted by recurring odor complaints on the following dates; March 12, 13, 16, April 8 and 23, June 16 and 17, August 5-12 and 26 and September 14-16 and 20 and continuing through the month of October, 2022.

Operator to immediately take additional reasonable and feasible measures to minimize and control nuisance odor impacts onsite.

Based on an odor investigation completed by the LEA consistent with 14 CCR 18302(d), and continuing odor complaints by residents at Arroyo Quemada Lane that have been unresolved through design and operating considerations identified in the facility's Odor Impact Minimization Plan, the operator is directed to prepare and implement an Odor Best Management Practice Feasibility report (14CCR-17896.30) to identify Best Management Practices and develop new odor control methods by no later than November 4, 2022 (within 45 days of this inspection). The Odor Best Management Practice Feasibility Report should include the required elements of 14 CCR 17896.30 (b).

No Areas of Concern

Inspection Report Comments

Weather: Sunny, 85F and south-easterly winds at 5 mph

Anaerobic Digestion Facility (ADF) Monthly Inspection:

-Noted piles of Source Separated Organics (SSO), Organic Fraction of Municipal Solid Waste (OFMSW) from the

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
10/19/2022

MRF.

- Both eye-wash stations and showers were operating adequately.
- Noted misters were not operating during today's inspection.
- Noted maintenance occurring on malfunctioning engine chiller. (picture)
- Hazardous Material container 5-gallon drum provided in ADF hall, pending start of accumulation date.
- September load checks and tonnage reports were all adequate at this time, but special occurrences were inaccurate and missing complaint information.
- Submit the Odor BMP Feasibility Report by deadline of November 4, 2022.
- Actions should be taken immediately to return to compliance with State standards for controlling off-site litter.

Notes:

1. Refer to violation for PRC 44014(b) for failure to comply with permit terms and conditions.
2. Refer to violation for CCR14-Section 17896.31-Odor Minimization Plan.
3. Provide organics sampling dates for third and fourth quarters, 2022.
4. Ensure misters are operating during business hours.
5. Next Five-Year Review application will be due on February 2, 2027.

Attachments

engine chiller maintenance

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
11/2/2022

1. If it is determined possible odors impacts occurred, appropriate LEA and/or neighbors contact is made. (OIMP section 1.B)
2. Following complaint response protocol (OIMP section 3), including documentation in site Complaint Log and Special Occurrence Log and notification to LEA as noted by recurring odor complaints including on: March 12, 13, 16, April 8 and 23, June 16 and 17, August 5-12 and 26 and September 14-16 and 20, 2022.
3. Use of a misting system charged with flocculent and deodorizers to minimize the formation of odors and dust inside the building. (OIMP section 4)

Operator to immediately implement procedures established in operator's OIMP, and take additional reasonable and feasible measures (such as identified in submitted Odor Best Management Practice (BMP) Feasibility Report) to minimize and control nuisance odor impacts.

No Areas of Concern

Inspection Report Comments

Weather: Sunny, 63F and north-easterly winds at 18 mph

Anaerobic Digestion Facility (ADF) Monthly Inspection:

- Noted piles of Source Separated Organics (SSO), Organic Fraction of Municipal Solid Waste (OFMSW) from the MRF.
- Both eye-wash stations and showers were operating adequately.
- Noted misters were not operating during today's inspection.
- Hazardous Material container 5-gallon drum provided in ADF hall, pending start of accumulation date.
- Organics sampling submitted for third quarter for ADF.
- October load checks and tonnage reports were all adequate at this time, and special occurrences indicated complaint information.
- Operator submitted Odor Best Management Practice (BMP) Feasibility Report on November 4, 2022. LEA will formally respond to Odor BMP Feasibility report after consultation with CalRecycle in accordance with 14 CCR section 17896.30(d). The operator is encouraged to implement feasible measures to reduce and eliminate odors, as off-site odors are still occurring, including reports on October 3, 4, 8, 10, 12, 16-20, 23, 24, 25 and 29, and November 2, 4-7 and 15.

In-Vessel Digestion Operation and Facility Inspection Report (104)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
11/2/2022

Notes:

1. Refer to violation for 14 CCR section 17896.31 Odor Minimization Plan.
2. Refer to violation for 14 CCR section 17896.32 Odor and Nuisance Control
3. Provide organics sampling dates for fourth quarter 2022.
4. Ensure misters are operating during business hours.
5. Next Five-Year Review application will be due on February 2, 2027.

No Attachments

Compostable Materials Handling Operation and Facility Inspection Report (93)

Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
11/2/2022

that has been and is creating odor and nuisance conditions off-site.

14 CCR 17863.4 - Odor Impact Minimization Plan

Occurrence of odor impacts and failure to implement procedures established in operator's odor impact minimization plan (OIMP) including:

1. If it is determined possible odors impacts occurred, appropriate LEA and/or neighbors contact is made. (OIMP section 1.B)
2. Following complaint response protocol (OIMP section 3), including documentation in site Complaint Log and Special Occurrence Log and notification to LEA as noted by recurring odor complaints including on: March 12, 13, 16, April 8 and 23, June 16 and 17, August 5-12 and 26 and September 14-16 and 20, 2022.
3. Turning windrows to allow and retain greater porosity, dependent on wind patterns. (OIMP section 4.A.2. and 4.D)
4. Water added to maintain moisture content. (OIMP section 5.B)
5. Eliminating areas of standing water. (OIMP section 5.E)
6. Decrease pile size and expedite shipping finished compost to end user. (OIMP Table 1: ADF & CMU Sources of Odor and Possible Management Techniques)

Operator to immediately implement procedures established in operator's OIMP, and take additional reasonable and feasible measures (such as identified in submitted Odor Best Management Practice (BMP) Feasibility Report) to minimize and control nuisance odor impacts.

No Areas of Concern

Inspection Report Comments

Weather: Sunny, 63F and north-easterly winds at 18 mph

Compost Management Unit (CMU) Monthly Inspection:

-Pathogen reduction lab results from October 5, 2022 for finished compost passed for Fecal Coliform and Salmonella.

-Noted 17 windrows of compost undergoing curing process on the CMU floor this day. Finished compost storage pile(s) exceed storage volume and duration as facility was designed and have encroached on area envisioned for windrows in the curing process.

-Noted a section of the chain link fence was missing and informed by operator that the fence company has been delayed, but work order is approved and proposed to be completed by next inspection.

**Compostable Materials Handling Operation and Facility Inspection
Report (93)
Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015)
11/2/2022**

- Organic sampling completed for third quarter.
- Noted damage to enclosure on ADF facing side. (picture)
- Operator provided daily temperature monitoring records for middle portion of the windrows at the CMU as well as October load checks, tonnage reports and updated training records.
- Operator submitted Odor Best Management Practice (BMP) Feasibility Report on November 4, 2022. LEA will formally respond to Odor BMP Feasibility report after consultation with CalRecycle in accordance with 14 CCR section 17863.4.1(d). The operator is encouraged to implement feasible measures to reduce and eliminate odors, as off-site odors are still occurring, including reports on October 3, 4, 8, 10, 12, 16-20, 23, 24, 25 and 29, and November 2, 4-7 and 15.
- Employees received training in Hazardous Material Recognition and Awareness.

Notes:

1. Refer to violation from 14 CCR section 17863.4 Odor Impact Minimization Plan
2. Refer to violation from 14 CCR section 17867(a)(2) Odor Control
3. Refer to violation from 14 CCR section 17867 (a)(3)
Vectors/Litter/Hazard/Nuisance/Noise/Dust
3. Provide organics sampling dates for fourth quarter, 2022.
4. Repair chain link enclosure on landfill side and also on ADF side.
5. Next Five-Year Review application will be due on February 2, 2027.

No Attachments



Central Coast Regional Water Quality Control Board

March 17, 2023

SENT VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7020 1810 0002 0768 1810

John Dewey
Chief Executive Officer
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza Drive, Suite 200
Newport Beach, CA 92660
john@deweygroup.com

Dear John Dewey,

ENFORCEMENT PROGRAM: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY – NOTICE OF VIOLATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify Mustang Renewable Power Ventures, LLC (Discharger) of alleged violations of state law at its Tajiguas Compost Management Unit (Facility) located at 14470 Calle Real in Goleta, require a written response describing the actions taken or planned to be taken to address violations and prevent future violations, and explain the potential civil administrative liability for non-compliance with state and federal laws, including unauthorized discharges of waste to waters of the state and waters of the United States.

Background

The Discharger is enrolled General Waste Discharge Requirements for Commercial Composting Operations Order 2020-0012-DWQ ([Compost General Order](#)). The Facility is also a postclosure land use at the Tajiguas Landfill, which is owned and operated by the County of Santa Barbara (County).

On June 11, 2021, the Central Coast Water Board issued the Discharger a notice of applicability ([NOA](#)) to enroll the Facility in the Compost General Order. The NOA included approval of the Discharger's Water and Wastewater Management Plan, which is included in the Facility's [technical report](#). The approved Water and Wastewater Management Plan details operational procedures to prevent wastewater from

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

discharging from the Facility. The Compost General Order defines wastewater as “leachate or any other liquid flowing from, or on the working surface” and leachate as “any liquid formed by the drainage of liquids from, or percolation/flow of liquids through any feedstock, additive, amendment, or compost (active, curing, or final product) pile” (Compost General Order Attachment A). Due to concerns about the discharge of wastewater from the Facility based on previous inspections on [December 5, 2022](#), and [January 25, 2023](#), and from conversations with the Discharger and County staff, Central Coast Water Board staff conducted a Facility [inspection on March 13, 2023](#).

Alleged Violations

Based on information provided by Mustang Renewable Power Ventures, LLC staff and County staff and information from site inspections the Discharger has violated the following conditions of the Compost General Order at the Facility:

1. The Discharger has not managed wastewater in accordance with the Facility’s approved Water and Wastewater Management Plan, which is a violation of Compost General Order Specification 6. These violations include not implementing the following procedures included in the approved Water and Wastewater Management Plan:
 - a. The Water and Wastewater Management Plan indicates that before bypassing runoff from the compost working surface as clean stormwater, operators would first fully cover the compost with waterproof tarpaulins, place wattles between compost rows, and sweep the isles between windrows. During recent runoff diversion, the compost windrows and piles were not fully covered, the aisles were not fully swept to remove compost/waste from the exposed working surface areas, and wattles were not placed between all windrows. Thus, working surface runoff from the March 10, 2023, storm contacted compost/waste, which discharged from the Facility as wastewater. Mustang Renewable Power Ventures, LLC staff and County staff indicated that this water was diverted during the March 10, 2023, storm to the north sedimentation basin, which ultimately discharged to Pila Creek.
 - b. The approved Water and Wastewater Management Plan indicates that wattles would be placed at the stormwater drainage inlets at all times. During the [March 13, 2023, inspection](#) there were no wattles surrounding the northern drainage inlet.
 - c. The approved Water and Wastewater Management Plan includes requirements to sample and test each time runoff is bypassed to the Landfill north sedimentation basin instead of being captured as wastewater within the onsite tanks. Based on conversations with Mustang Renewable Power Ventures, LLC staff and County staff, samples were not taken during previous diversion events where water was discharged to the Landfill north sedimentation basin as required by the approved Water and Wastewater Management Plan, such as diversion

during the January 9, 2023, storm event. Another diversion event, where samples were not collected, occurred during the December 27-29, 2021 storm event, which was documented in the [March 2022 Annual Report](#). Conversations with the Mustang Renewable Power Ventures, LLC staff and County staff indicate that there may be additional bypass/discharges after work hours because there are no sensors, flow meters, or other triggers to alert operators of an overflow or bypass.

2. The Discharger has discharged waste (wastewater) to surface water (Pila Creek) without authorization from an NPDES permit. This is a violation of Compost General Order Prohibition 6. The Industrial General Permit (IGP) is a stormwater permit and does not authorize the discharge of wastewater, which is defined above. IGP requirements and potential violations are not discussed in this letter.
3. The Discharger discharged feedstock and compost outside of the designated composting operation areas that are specified in the technical report. This is a violation of Compost General Order Prohibition 1 and Specification 4. This includes compost found under the conveyer system that connects the anaerobic digestion facility (ADF) to the compost Facility, as documented in the [March 13, 2023, inspection report](#). This includes compost found on the densitometer table working surface area, which according to the approved technical report, was designed to include a berm surrounding the working surface to prevent compost impacted wastewater from discharging from the Facility. The lack of berm installation was documented by the Discharger in a [February 8, 2023, report](#). Central Coast Water Board staff did not approve this report as an official technical report addendum and responded to the Discharger via email on February 8, 2023, indicating concerns about wastewater potentially discharging from this area. This correspondence as well as documentation of compost/waste on the densitometer table working surface, is included in the [March 13, 2023, inspection report](#).
4. The Discharger has not maintained Facility berms in good working condition and has not prevented erosion and damage to the berms, as documented in recent inspection reports. This is a violation of Compost General Order Specification 10 and Maintenance Requirement 1.
5. The Discharger has not maintained the drainage conveyance systems to convey wastewater in a manner that prevents conditions resulting in contamination, pollution, or nuisance. The piping and connections that makes up the drainage conveyance system continues to leak wastewater to areas outside of the Facility, as documented in recent inspection reports. This is a violation of Compost General Order Specification 11.
6. The Discharger has not implemented sufficient corrective actions to address previous noncompliance, such as making timely and successful repairs or replacements to the wastewater/stormwater pipes. This is a violation of Compost General Order Additional Requirement 2.

7. The Discharger has not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of wastewater discharges from the Facility, including the wastewater discharge resulting from the January 9, 2023, storm event. The Compost General Order includes reporting requirements including estimating the volume of wastewater when there is a discharge, which must be submitted in a report to Central Coast Water Board staff within 10 working days of noncompliance. This is a violation of Compost General Order Monitoring and Reporting section B.3 and Compost General Order Notification Requirement 4.
8. Facility feedstocks listed in the notice of intent and Technical Report are green material and anaerobic digestate. The Compost General Order requires that anaerobic digestate be derived from allowable Tier 2 feedstocks. Additionally, the Compost General Order defines anaerobic digestate as, "the solid portion of the material remaining after the anaerobic digestion of any combination of agricultural materials, biosolids, sewage sludge, food materials, green materials, manure, paper materials, or vegetative food materials. Dewatered digestate contains organic matter that may need to be further treated to stabilize it, usually through aerated composting." The Compost General Order prohibits any feedstock, additive, or amendment other than those specifically described in the Compost General Order, unless approved by the Regional Water Board. Based on information provided by the Discharger via email on March 15, 2023, and presented in the [March 13, 2023, inspection report](#) including the March 15, 2023, email as attachment 1 and inspection photos, feedstock at the site contain significant amounts of inorganic contaminants including glass and plastics, which are not approved feedstocks, additives, or amendments, nor are these materials compostable. This is a violation of Compost General Order Prohibition 3 and 4 and Specification 7. The Discharger must comply with the Compost General Order and ensure that only approved feedstocks are stored and/or composted at the Facility. For a full list of approved Tier 1 and 2 feedstocks allowed in anaerobic digestate, please see Compost General Order Table 2."

Immediate corrective actions must be taken to address the violations listed above and actions must be taken to ensure that future operations meet the conditions of the Compost General Order and the approved Water and Wastewater Management Plan.

Requirements for Written Response to Alleged Violations

The Discharger must address the alleged violations described above immediately and must **submit by April 3, 2023**, a written response describing the actions taken or planned to address the above alleged violations and prevent future violations. For violations that the Discharger has not addressed immediately, the response must include a time schedule for corrective actions to bring the compost Facility into compliance with the requirements of the Compost General Order.

Responses must be submitted electronically to: Jordan.haserot@waterboards.ca.gov.

Tajiguas Compost Management Unit
Notice of Violation

- 5 -

March 17, 2023

This notice of violation is intended to facilitate a timely remedy to address the Discharger's alleged Compost General Order violations. Central Coast Water Board staff will determine the need to recommend further enforcement actions based upon the Discharger's responses and future compliance with the Compost General Order.

Potential Administrative Civil Liability

The Discharger is hereby on notice that California Water Code (Water Code) section 13350 provides that any person who intentionally or negligently violates any conditions issued or amended by the Regional Water Board or State Water Board, is subject to administrative civil liability of up to \$5,000 per day of violation or \$10 per gallon of waste discharged. Alternatively, the superior court may impose civil liability for each violation of up to \$15,000 per day or \$20 per gallon of waste discharged.

The Discharger does not have a permit to discharge pollutants to waters of the United States. Unpermitted discharges of pollutants to waters of the United States are violations of federal Clean Water Act (Clean Water Act) section 301. Clean Water Act section 301 violations are subject to liability under Water Code section 13385, which authorizes the Central Coast Water Board to impose administrative civil liability of up to \$10,000 per day of violation and \$10 per gallon discharged but not cleaned up over 1,000 gallons. Alternatively, a court may impose civil liability of up to \$25,000 for each day the violation occurs, and up to \$25 per gallon of waste discharged but not cleaned up over 1,000 gallons.

Furthermore, the Central Coast Water Board reserves the right to take any enforcement action authorized by law including, but not limited to, termination of the Compost General Order coverage (Compost General Order Additional Requirement 1) which may result from any noncompliance with Compost General Order requirements, and would require the Discharge to implement a closure plan to perform site restoration as outlined in the Facility's Technical Report.

If you have any questions, please feel free to contact Jordan Haserot by phone at (805) 542-4781 or email at jordan.haserot@waterboards.ca.gov, or Ryan Lodge at (805) 549-3506.

Sincerely,

for Thea S. Tryon
Assistant Executive Officer

Tajiguas Compost Management Unit
Notice of Violation

- 6 -

March 17, 2023

cc:

John Kular, johnkularpe@gmail.com

Jeanette Gonzales-Knight, jgonzal@countyofsb.org

Travis Spier, tspier@countyofsb.org

Christina Wilder, cwilder@countyofsb.org

Norma Campos Bernal, norma.camposbernal@sbcphd.org

Angela Schroeter, angela.schroeter@waterboards.ca.gov

Ryan Lodge, ryan.lodge@waterboards.ca.gov

Jordan Haserot, jordan.haserot@waterboards.ca.gov

Thea Tryon, Thea.Tryon@waterboards.ca.gov

Tamara Anderson, Tamara.Anderson@waterboards.ca.gov

Todd Stanley, Todd.Stanley@waterboards.ca.gov

Jesse Woodard, Jesse.Woodard@Waterboards.ca.gov

R:\RB3\Shared\LDU\Program\Compost\Compost Facilities\Tajiguas\NOVs\2023\Tajiguas Compost
Managemenet Unit NOV.docx

GeoTracker ID: T10000017039

CIWQS Place ID: 874811



Central Coast Regional Water Quality Control Board

June 20, 2023

John Dewey
Chief Executive Officer
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza Drive, Suite 200
Newport Beach, CA 92660
john@deweygroup.com

SENT VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7019-1640-0000-7909-3224

Scott McGolpin
Public Works Director
County of Santa Barbara Public Works
123 East Anapamu Street
Santa Barbara, CA 93101
mcolpin@countyofsb.org

Certified Mail No. 7019-1640-0000-7909-3251

Dear John Dewey and Scott McGolpin,

ENFORCEMENT PROGRAM: TAJIGUAS COMPOST MANAGEMENT UNIT, SANTA BARBARA COUNTY – NOTICE OF VIOLATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify Mustang Renewable Power Ventures, LLC and the County of Santa Barbara (Collectively referred to as Dischargers) of alleged violations of state law at its Tajiguas Compost Management Unit (Facility) located at 14470 Calle Real in Goleta, and to explain the potential civil administrative liability for non-compliance with state and federal laws, including unauthorized discharges of waste to waters of the state and waters of the United States. Unlike the previous March 17, 2023, NOV, which listed just Mustang Renewable Power Ventures, LLC as a discharger/responsible party, this NOV also lists the County of Santa Barbara as a discharger/responsible party that is liable for Facility violations due to the County of Santa Barbara, Department of Public Works ownership of the Facility, per the [Notice of Intent](#) (NOI).

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

Background

The Dischargers are enrolled in General Waste Discharge Requirements for Commercial Composting Operations Order 2020-0012-DWQ ([Compost General Order](#)). The Facility is also a postclosure land use at the Tajiguas Landfill, which is owned and operated by the County of Santa Barbara (County).

On March 17, 2023, the Central Coast Water Board issued a notice of violation ([March 17, 2023, NOV](#)) to Mustang Renewable Power Ventures, LLC because of violations of the Compost General Order.

On May 8, 2023, the Central Coast Water Board issued an updated monitoring and reporting program ([MRP](#)) requiring the Dischargers conduct more frequent Facility inspections to inform immediate Facility repairs and corrective actions, provide additional details about Compost General Order compliance, provide Central Coast Water Board staff with more frequent and detailed Facility information about potential Compost General Order violations, and provide Facility specific requirements that more appropriately align with the site-specific operations.

On June 13, 2023, the Central Coast Water Board performed an inspection of the Facility. The [June 13, 2023, Inspection Report](#) noted that the violations outlined in the March 13, 2023, NOV had not been corrected. The continued Compost General Order violations include the following:

1. Water and wastewater have not been managed in accordance with the operational procedures within the approved Water and Wastewater Management Plan, which is required by Compost General Order Specification 6.
2. The unauthorized discharge of wastewater to surface water (Pila Creek), which violates Compost General Order Prohibition 6. During the June 13, 2023, inspection wastewater was seen leaving the Facility and entering two landfill stormwater drains that connect to landfill sediment basins. According to County staff, the basins discharged to Pila Creek on April 4.
3. The discharge of feedstock and compost outside of designated areas, including below the conveyor connecting the ADF to the CMU and the D-table area which still does not have a berm surrounding the working surface as was indicated within the Facility's technical report, which is a violation of Compost General Order Prohibition 1 and Specification 4.
4. Facility berms continue to be damaged, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 10 and Maintenance Requirement 1.
5. The Facility conveyance system pipes continue to be damaged and leak wastewater to areas outside of the Facility, which violates Compost General Order Design, Construction, and Operation Requirements – All Tiers number 11.

6. The Dischargers have not implemented sufficient corrective actions to address previous noncompliance, which violates General Order Additional Requirement 2.
7. The Dischargers have not adequately reported events of noncompliance or notified Central Coast Water Board of all Compost General Order violations, such as notification and reporting of the continued wastewater discharges from the Facility, which violates Compost General Order Monitoring and Reporting section B.3. and Compost General Order Notification Requirement 4.
8. Use of unapproved feedstocks due to the inclusion of significant physical contaminants, including plastics and glass, which is prohibited by Compost General Order Prohibition 3 and 4 and Specification 7.

Following the June 13, 2023, inspection, the Dischargers submitted an updated Water and Wastewater Management Plan, which is still under review and has not been approved.

Alleged Violations

As indicated in the [March 17, 2023, NOV](#), the drainage conveyance pipes were leaking wastewater outside of the Facility. The [March 20, 2023, response to the March 17, 2023, Notice of Violation](#) submitted on behalf of the Dischargers, indicated that the drainage conveyance pipes would be fixed after the rainy season. Per the Compost General Order, the "wet season" is defined as October 1 to April 30. As was noted in the [June 13, 2023, inspection report](#), the pipes have not been repaired and the pipes continue to discharge wastewater from the Facility, even after the end of the wet season.

MRP B.3. and B.4. require that the Dischargers notify the Central Coast Water Board within 48 hours of knowledge of Compost General Order violations or within 24 hours of becoming aware of noncompliance that endangers human health or the environment. As required by MRP B.4. the Dischargers must submit a report within 10 working days of an incident such as a wastewater discharge. No such report has been submitted for the discharge noted during the June 13, 2023, inspection. Per MRP B.4. the incident report is required to include the following information:

- a. The approximate date, time, and location of the noncompliance including a description of the ultimate destination of any unauthorized discharge and the flow path of such discharge to a receiving water body;
- b. A description of the noncompliance and its cause;
- c. Include photographs of the working surface, compost piles, pipe inlets, and other documentation documenting site conditions during the discharge event;
- d. The available tank capacity (gallons) during each of the three days prior to each diversion event;

- e. The flow rate, volume, and duration of any discharge involved in the noncompliance, and how that volume was determined (i.e., flow meter, sensor);
- f. The amount of precipitation (in inches) the day of any discharge and for each of the seven days preceding the discharge;
- g. A description (location, date and time collected, field measurements of pH, temperature, dissolved oxygen and electrical conductivity, sample identification, date submitted to laboratory, and analyses requested, including sampling for the constituents listed in **Error! Not a valid bookmark self-reference.**) of noncompliance discharge samples and/or surface water samples taken;
- h. The period of noncompliance, including dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue;
- i. A time schedule and a plan to implement corrective actions necessary to prevent the recurrence of such noncompliance; and
- j. The laboratory analyses of the noncompliance discharge sample and/or upstream and downstream surface water samples shall be submitted to the Regional Water Board office within **45 days** of the discharge.

During the June 13, 2023, inspection, Central Coast Water Board staff informed the Dischargers that a wastewater sample must be taken of the wastewater discharging from the Facility, that they must estimate the volume of discharge, and must immediately stop wastewater from discharging. On June 15, 2023, Rincon Consultants, Inc., on behalf of the Dischargers, verified via email that the Dischargers collected a wastewater sample from the leaking Facility runoff collection pipes on June 14, 2023. The Facility continues to be in violation of MRP B.4. until a complete incident report is submitted and the discharge ceases. The Dischargers must also correct impacts from the discharge, such as the removal of impacted soil and wastewater that flowed offsite.

Compost General Order Monitoring Requirements 1 and 2 require that Dischargers comply with the requirements within the site specific MRP. MRP B.1. requires the submittal of monthly monitoring and maintenance reports by the 15th of each month. On June 14, 2023, Rincon Consultants, Inc. submitted the [May 2023 Monthly Monitoring and Maintenance Report](#) for the Tajiguas Compost Management Unit. The report was found to be insufficient at meeting the MRP requirements including the following:

1. The report was not properly signed and did not include the proper statement of certification in accordance with Compost General Order Report Requirement 5.
2. The report did not provide a transmittal letter explaining the essential points including identifying violations as well as actions taken or planned to correct violations, as required by MRP B.1.a.

3. The report did not include a map showing location of observation stations or monitoring points as required by MRP B.1.b.
4. The report did not include all information in MRP section A.1.a. as required to be reported per MRP B.1.c. including a map showing where ponding on the working surface was observed, estimated size of affected area and flow rate of wastewater leaving the facility, a map of where wastewater had affected areas outside of the facility, and photographs of observed and corrected deficiencies.
5. The report did not include all information in MRP section A.1.b. as required to be reported per MRP B.1.d. including not reporting the available capacity within storage systems and capacity contained, estimated in gallons.
6. The report did not discuss the status of Compost General Order compliance and the status of correcting violations, as required by B.1.j.
7. The report did not include information for the percent of physical contaminants (e.g., glass, metal, plastic) by dry weight of received feedstock at the compost facility within the reporting month or what the primary physical contaminants were, as required by MRP B.1.k.

Immediate corrective actions must be taken to address the new and ongoing violations listed above and actions must be taken to ensure that future operations meet the conditions of the Compost General Order and associated MRP, as well as the approved Water and Wastewater Management Plan.

Potential Administrative Civil Liability

The Dischargers are hereby on notice that California Water Code (Water Code) section 13350 provides that any person who intentionally or negligently violates any conditions issued or amended by the Regional Water Board or State Water Board, is subject to administrative civil liability of up to \$5,000 per day of violation or \$10 per gallon of waste discharged. Alternatively, the superior court may impose civil liability for each violation of up to \$15,000 per day or \$20 per gallon of waste discharged.

The Dischargers do not have a permit to discharge pollutants to waters of the United States. Unpermitted discharges of pollutants to waters of the United States are violations of federal Clean Water Act (Clean Water Act) section 301. Clean Water Act section 301 violations are subject to liability under Water Code section 13385, which authorizes the Central Coast Water Board to impose administrative civil liability of up to \$10,000 per day of violation and \$10 per gallon discharged but not cleaned up over 1,000 gallons. Alternatively, a court may impose civil liability of up to \$25,000 for each day the violation occurs, and up to \$25 per gallon of waste discharged but not cleaned up over 1,000 gallons.

Furthermore, the Central Coast Water Board reserves the right to take any enforcement action authorized by law including, but not limited to, termination of the Compost

Tajiguas Compost Management Unit
Notice of Violation

- 6 -

June 20, 2023

General Order coverage (Compost General Order Additional Requirement 1) which may result from any noncompliance with Compost General Order requirements, and would require the Dischargers to implement a closure plan to perform site restoration as outlined in the Facility's Technical Report.

If you have any questions, please feel free to contact Jordan Haserot by phone at (805) 542-4781 or email at jordan.haserot@waterboards.ca.gov, or Ryan Lodge at (805) 549-3506.

Sincerely,

for Thea S. Tryon
Assistant Executive Officer

cc:

John Kular, johnkularpe@gmail.com
Dylan Ellis, dylan@mustangrpv.com
Caitlyn Teague, cteague@rinconconsultants.com
Marty Wilder, mwilder@countyofsb.org
Travis Spier, tspier@countyofsb.org
Jeanette Gonzales-Knight, jgonzal@countyofsb.org
Christina Wilder, cwilder@countyofsb.org
Kevin Brown, kevbrown@countyofsb.org
Norma Campos Bernal, ncamposbernal@sbcphd.org
Jacqueline Tkac, jacqueline.tkac@Waterboards.ca.gov
Angela Schroeter, angela.schroeter@waterboards.ca.gov
Ryan Lodge, ryan.lodge@waterboards.ca.gov
Jordan Haserot, jordan.haserot@waterboards.ca.gov
Thea Tryon, Thea.Tryon@waterboards.ca.gov
Tamara Anderson, Tamara.Anderson@waterboards.ca.gov
Todd Stanley, Todd.Stanley@waterboards.ca.gov
Jesse Woodard, Jesse.Woodard@Waterboards.ca.gov

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Tajiguas CMU Notice of Violation.docx

GeoTracker ID: T10000017039
CIWQS Place ID: 874811

ATTACHMENT D

Non-payment to Subcontractors and Regulatory Agency

Jeanette Gonzales-Knight

From: Kevin Brown
Sent: Thursday, September 28, 2023 9:55 AM
To: Jeanette Gonzales-Knight
Subject: FW: Outstanding MSB Invoices
Attachments: 60445.pdf; 60559.pdf; 60588.pdf; 60647.pdf

Importance: High

Jeanette,

See attached for MSB's outstanding invoices with the APCD. In addition to these invoices, MSB has not paid the settlement fee for their NOV's (see the email from Glenn Gazdecki yesterday).

I also asked that the APCD gives me a heads up if a stop work order is issued since this would impact the MRF biofilter and GORE permits.

Thank you,

Kevin Brown
Interim Compliance Manager
Senior Compliance Analyst

Santa Barbara County Public Works
Resource Recovery and Waste Management Division
130 East Victoria Street, Suite 100
Santa Barbara, CA 93101
Email: kevbrown@countyofsb.org
Office: (805) 882-3622
Cell: (858) 776-7045

From: Gerardo De Los Santos <DeLosSantosG@sbcapcd.org>
Sent: Thursday, September 28, 2023 9:28 AM
To: Kevin Brown <kevbrown@countyofsb.org>
Cc: Rachel Silva <SilvaR@sbcapcd.org>
Subject: RE: Outstanding MSB Invoices

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good morning Kevin,

Please see attached MSB outstanding invoices - 60445, 60559, 60588 and 60647.

Thanks for the clarification.

Thank you,



Gerardo De Los Santos

Accounting Technician
Air Pollution Control District
Santa Barbara County
260 N. San Antonio Rd., Suite A
Santa Barbara, CA 93110

DeLosSantosG@sbcapcd.org
805.979.8291

ourair.org [@OurAirSBC](https://twitter.com/OurAirSBC)  

[Sign Up for Air Alerts](#) →

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From: Kevin Brown <kevbrown@countyofsb.org>
Sent: Thursday, September 28, 2023 8:19 AM
To: Rachael A. Silva <SilvaR@sbcapcd.org>
Subject: Outstanding MSB Invoices

Good Morning Rachael,

Hope all is going well. Can you send me copies of any outstanding invoices that Mustang Santa Barbara (MSB) has? I currently know of three: 60445, 60559, and 60588.

Additionally, I would like to clarify some statements made by John Dewey in some past emails to you and Gerardo. The County has provided MSB the contractual payments on time and we are current with those payments. We do not “control” his budget as he stated.

Appreciate the help!

Thank you,

Kevin Brown
Interim Compliance Manager
Senior Compliance Analyst

Santa Barbara County Public Works
Resource Recovery and Waste Management Division
130 East Victoria Street, Suite 100
Santa Barbara, CA 93101
Email: kevbrown@countyofsb.org
Office: (805) 882-3622
Cell: (858) 776-7045



air pollution control district
SANTA BARBARA COUNTY

260 North San Antonio Rd Suite A
Santa Barbara, CA 93110-1315

Invoice:60445

Date:6/20/2023

Terms:Net 30 Days

SBCAPCD Tax ID #77-0384167

INVOICE

Bill To:

Mustang Renewable Power Ventures, LLC.
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Attention: Mr. John Dewey

Company No.:110368

Billing Type:Staff Labor /Contractor Billing

Billing Period:05/15/2023-06/11/2023

Project No.:205669

Facility/Permit No.:11480/

Vendor No.:N/A

Project Name: 205669-Resource Recovery Mustang

	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Air Quality Engineer I/II	2.0	\$142.23	\$284.46
Air Quality Engineer III	43.5	\$179.27	\$7,798.25
Air Quality Specialist III	3.5	\$164.22	\$574.77
Division Manager	1.0	\$235.50	\$235.50
Extra-Help	4.0	\$181.61	\$726.45
Subtotal	54.0		\$9,619.43

Total Due: \$9,619.43

REMIT PAYMENTS TO THE ADDRESS ABOVE

Please indicate invoice number 60445 on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE EMAIL AcctRec@sbcapcd.org

The APCD charges \$25.00 for returned checks. Other Penalties/fees may be incurred as a result of returned checks (see District Rule 210).

Billing Detail

Billing From: 5/15/2023 to 6/11/2023
Date Billed: 6/20/2023

Report Date: 6/14/2023

Project	205669	Resource Recovery Mustang	
Permit:			
Activity 460	Conducting health risk assessments including gathering inputs, modeling, writing HRA reports, reviewing HRAs performed by applicants, writing comment letters, meetings.		
	Extra-Help		<u>0.5 hours</u>
			0.5 hours
<hr/>			
Permit:			
Activity 202	Responsible Agency Review		
	Extra-Help		<u>3.5 hours</u>
			3.5 hours
<hr/>			
Permit:			
Activity 300	All activities associated with an inspection including preparation, travel to and from site, site visit, compliance review, recordkeeping and report review, preparation and review of inspection report.		
	Air Quality Specialist III		<u>2.5 hours</u>
			2.5 hours
<hr/>			
Permit:			
Activity 302	Review and documentation of violations, review violation response, correspondence, follow up on violation until compliance is acheived.		
	Air Quality Specialist III		1.0 hours
	Division Manager		<u>1.0 hours</u>
			2.0 hours
<hr/>			
Permit:			
Activity 400	Process and review letters, draft & final permits, evaluation correspondence and other materials associated with specific permits. Attend meetings (including site visits) specific to permits.		
	Air Quality Engineer III		<u>41.5 hours</u>
			41.5 hours
<hr/>			
Permit:			
Activity 431	Report review, correspondence, comment letters, and approval letters.		
	Air Quality Engineer III		<u>2.0 hours</u>
			2.0 hours
<hr/>			
Permit:			
Activity 434	Review source test reports, prepare comment letters, correspondence, and approval letters.		
	Air Quality Engineer I		<u>2.0 hours</u>
			2.0 hours
<hr/>			
Project Total:			54.0 hours



air pollution control district
SANTA BARBARA COUNTY

260 North San Antonio Rd Suite A
Santa Barbara, CA 93110-1315

Invoice:60559

Date:7/10/2023

Terms:Net 30 Days

SBCAPCD Tax ID #77-0384167

INVOICE

Bill To:

Mustang Renewable Power Ventures, LLC.
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Attention: Mr. John Dewey

Company No.:110368

Billing Type:DAS Program Fee

Billing Period:FY 23 - 24

Project No.:200630

Facility/Permit No.:

Vendor No.:N/A

DAS Program:

Description

	<u>Total</u>
ADF 1 - DAS Program Fee July - December 2023	\$7,618.08
ADF 2 - DAS Program Fee July - December 2023	\$7,618.08
MRF 1 - DAS Program Fee July - December 2023	\$7,618.08
MRF 2 - DAS Program Fee July - December 2023	\$7,618.08
	\$30,472.32

Total Due: \$30,472.32

REMIT PAYMENTS TO THE ADDRESS ABOVE

Please indicate invoice number 60559 on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE EMAIL AcctRec@sbcapcd.org

The APCD charges \$25.00 for returned checks. Other Penalties/fees may be incurred as a result of returned checks (see District Rule 210).



air pollution control district
SANTA BARBARA COUNTY

260 North San Antonio Rd Suite A
Santa Barbara, CA 93110-1315

Invoice: 60588

Date: 8/16/2023

Terms: Net 30 Days

SBCAPCD Tax ID #77-0384167

INVOICE

Bill To:

Mustang Renewable Power Ventures, LLC.
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Attention: Mr. John Dewey

Company No.: 110368

Billing Type: Staff Labor / Contractor Billing

Billing Period: 06/12/2023-07/23/2023

Project No.: 205669

Facility/Permit No.: 11480/

Vendor No.: N/A

Project Name: 205669-Resource Recovery Mustang

	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Air Quality Engineer I/II	2.0	\$153.18	\$306.36
Air Quality Engineer III	8.0	\$193.07	\$1,544.56
Extra-Help	5.0	\$195.59	\$977.95
Subtotal	15.0		\$2,828.87

Total Due: \$2,828.87

REMIT PAYMENTS TO THE ADDRESS ABOVE

Please indicate invoice number 60588 on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE EMAIL AcctRec@sbcapcd.org

The APCD charges \$25.00 for returned checks. Other Penalties/fees may be incurred as a result of returned checks (see District Rule 210).

Billing DetailBilling From: 6/12/2023 to 7/23/2023
Date Billed: 8/16/2023

Report Date: 8/14/2023

Project 205669	Resource Recovery Mustang	
Permit:		
Activity 202	Responsible Agency Review	
	Extra-Help	5.0 hours
		5.0 hours
Permit:		
Activity 400	Process and review letters, draft & final permits, evaluation correspondence and other materials associated with specific permits. Attend meetings (including site visits) specific to permits.	
	Air Quality Engineer III	8.0 hours
		8.0 hours
Permit:		
Activity 434	Review source test reports, prepare comment letters, correspondence, and approval letters.	
	Air Quality Engineer I	2.0 hours
		2.0 hours
Project Total:		15.0 hours



air pollution control district
SANTA BARBARA COUNTY

260 North San Antonio Rd Suite A
Santa Barbara, CA 93110-1315

Invoice: 60647

Date: 9/22/2023

Terms: Net 30 Days

SBCAPCD Tax ID #77-0384167

INVOICE

Bill To:

Mustang Renewable Power Ventures, LLC.
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
Attention: Mr. John Dewey

Company No.: 110368

Billing Type: Staff Labor / Contractor Billing

Billing Period: 07/24/2023-09/03/2023

Project No.: 205669

Facility/Permit No.: 11480/

Vendor No.: N/A

Project Name: 205669-Resource Recovery Mustang

	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Air Quality Engineer I/II	3.0	\$153.18	\$459.54
Air Quality Engineer III	13.0	\$193.07	\$2,509.91
Division Supervisor	1.0	\$221.09	\$221.09
Air Quality Specialist III	6.5	\$176.86	\$1,149.59
Division Manager	4.0	\$253.63	\$1,014.53
Extra-Help	8.0	\$195.59	\$1,564.73
Subtotal	35.5		\$6,919.39
County Counsel Charges 4/1/23-6/30/23	1.0	\$193.35	\$193.35
Subtotal	1.0		\$193.35

Total Due: \$7,112.74

REMIT PAYMENTS TO THE ADDRESS ABOVE

Please indicate invoice number 60647 on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE EMAIL AcctRec@sbcapcd.org

The APCD charges \$25.00 for returned checks. Other Penalties/fees may be incurred as a result of returned checks (see District Rule 210).

Billing DetailBilling From: 7/24/2023 to 9/3/2023
Date Billed: 9/22/2023

Report Date: 9/19/2023

Project 205669	Resource Recovery Mustang	
Permit:		
Activity 460	Conducting health risk assessments including gathering inputs, modeling, writing HRA reports, reviewing HRAs performed by applicants, writing comment letters, meetings.	
	Extra-Help	<u>1.5 hours</u>
		1.5 hours
Permit:		
Activity 202	Responsible Agency Review	
	Extra-Help	<u>6.5 hours</u>
		6.5 hours
Permit:		
Activity 302	Review and documentation of violations, review violation response, correspondence, follow up on violation until compliance is achieved.	
	Air Quality Engineer III	<u>1.0 hours</u>
	Air Quality Specialist III	<u>3.5 hours</u>
		4.5 hours
Permit:		
Activity 350	Receiving and reviewing variance petition, drafting public notice, preparing variance orders and staff reports, correspondence with petitioner, attending Hearing Board meeting, responding to inquiries, receipt and review of increments of progress and fina	
	Air Quality Specialist III	<u>3.0 hours</u>
	Division Manager	<u>3.5 hours</u>
		6.5 hours
Permit:		
Activity 400	Process and review letters, draft & final permits, evaluation correspondence and other materials associated with specific permits. Attend meetings (including site visits) specific to permits.	
	Air Quality Engineer III	<u>12.0 hours</u>
	Division Supervisor	<u>1.0 hours</u>
	Division Manager	<u>0.5 hours</u>
		13.5 hours
Permit:		
Activity 430	Review plans and proposed modifications to plans, preparation of comment letters, correspondence, and preparation of approval letters.	
	Air Quality Engineer I	<u>2.0 hours</u>
		2.0 hours

Billing Detail

Billing From: 7/24/2023 to 9/3/2023
Date Billed: 9/22/2023

Report Date: 9/19/2023

Permit:

Activity 432 Review source test plan and any proposed modifications, prepare comment letters, correspondence, and prepare approval letters.

Air Quality Engineer I

1.0 hours

1.0 hours

Project Total: 35.5 hours

Labor Summary

From 4/1/2023 to 6/30/2023

Selection Criteria: EmployeeID = 1-; Fund = 0001; Department = 013; Project = 8910

Layout Options: Summarized By = Project, Activity; Page Break At = Fund; Columns = PostOn, PayPeriod

Fund 0001 -- General

Employee ID	Employee Name	Post On	Pay Period	Amount	Prod Hours	Prod Rate
[REDACTED]	[REDACTED] 205317	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] 205516	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Activity TAJI - Tajiguas	205669					
13560	ALIRE, JENNIFER RICHARDSON	04/16/2023	202309	135.00	0.70	192.86
		Total Tajiguas		135.00	0.70	192.86
		Total Air Poll Dist		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Overhead Rate:
 APCD 1.4322*135.00 = \$193.35



Jeanette Gonzales-Knight

From: Kevin Brown
Sent: Wednesday, September 27, 2023 3:36 PM
To: Jeanette Gonzales-Knight
Subject: Fwd: Mutual Settlement Offer - 12 NOVs (Mustang Renewable Power Ventures, LLC
Attachments: 2023-07-11 Violation Settlement Agreement (12 NOVs - MRPV)-Signed.pdf; 2023-09-27 MS Offer NOV 13338.pdf

FYI.

Sent from my Verizon, Samsung Galaxy smartphone

Get [Outlook for Android](#)

From: Glenn G. Gazdecki <GazdeckiG@sbcapcd.org>
Sent: Wednesday, September 27, 2023 3:02:19 PM
To: John Dewey <john@deweygroup.com>; Kevin Brown <kevbrown@countyofsb.org>
Cc: Mutual Settlement <MutualSettlement@sbcapcd.org>
Subject: RE: Mutual Settlement Offer - 12 NOVs (Mustang Renewable Power Ventures, LLC)

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

John,

Attached is a pdf copy of the signed Violation Settlement Agreement for the aforementioned 12 NOVs. To date, the District has not received payment for the agreed settlement of civil penalties. The District requests that full payment for the past due amount of \$18,250 be submitted forthwith.

Also, please find attached a Mutual Settlement Offer for NOV 13338. Your timely response to this is also requested.

If you have any questions, please do not hesitate to contact me.

Sincerely, Glenn



Glenn G. Gazdecki

Mutual Settlement Officer
Air Pollution Control District
Santa Barbara County

GazdeckiG@sbcapcd.org
(805) 979-8301 (Office)

ourair.org [@OurAirSBC](https://twitter.com/OurAirSBC)  

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From: John Dewey <john@deweygroup.com>
Sent: Friday, July 28, 2023 2:16 PM
To: Glenn G. Gazdecki <GazdeckiG@sbcapcd.org>; kevbrown@countyofsb.org
Cc: Mutual Settlement <MutualSettlement@sbcapcd.org>
Subject: RE: Mutual Settlement Offer - 12 NOVs (Mustang Renewable Power Ventures, LLC)

Glenn,

Attached please find the Settlement Agreement which we have signed.

Kevin Brown and I had a discussion with Aimee Long and Charlotte Mountain today regarding NOV 13338. Aimee will reach out to you on that matter.

Thanks for your assistance.

Best Regards,

John Dewey
CEO
Mustang Renewable Power Ventures, LLC
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660
(805) 259-9499

From: Glenn G. Gazdecki <GazdeckiG@sbcapcd.org>
Sent: Tuesday, July 11, 2023 5:10 PM
To: John Dewey <john@deweygroup.com>; kevbrown@countyofsb.org
Cc: Mutual Settlement <MutualSettlement@sbcapcd.org>
Subject: Mutual Settlement Offer - 12 NOVs (Mustang Renewable Power Ventures, LLC)

Dear John Dewey and Kevin Brown,

Good afternoon.

My name is Glenn Gazdecki and I am the Mutual Settlement Officer for the Santa Barbara County Air Pollution Control District. Attached is the District's Mutual Settlement Offer for 12 Notices of Violation (NOVs 12924, 13195, 13196, 13215, 13255, 13258, 13266, 13310, 13312, 13313, 13315, 13318).

If you agree with the terms of the Settlement Offer, please sign and date the Agreement, and return a copy of the signed Agreement to me via email. After I receive the signed Agreement, I will sign it and send you a signed copy for your records.

Payment made by check should be made payable to the Santa Barbara County Air Pollution Control District and remitted to:

Santa Barbara County Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110

On a related matter, NOV 13338 was not included in this settlement offer because the Compliance database indicates that the violation has not returned to compliance. NOV 13338 is a Rule 201 (Permits Required) violation and each day of non-compliance may be considered a separate violation. Therefore, it is important that you follow-up with Aimee Long (Air Quality Specialist) at your earliest opportunity to address actions that still need to be taken to return to compliance. After the violation has returned to compliance, I will issue a separate Mutual Settlement Offer.

If you have any questions, please do not hesitate to contact me.

Sincerely, Glenn Gazdecki



Glenn G. Gazdecki

Mutual Settlement Officer
Air Pollution Control District
Santa Barbara County

GazdeckiG@sbcapcd.org
(805) 979-8301 (Office)

ourair.org [@OurAirSBC](https://www.facebook.com/OurAirSBC)

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john@deweygroup.com

09/27/2023

John Dewey
Mustang Renewable Power Ventures, LLC.
17 Corporate Plaza, Suite 200
Newport Beach, CA 92660

FID: 11480

SSID: 03707

Re: Mutual Settlement Offer - Notice of Violation #13338

Dear John Dewey:

On 05/26/2023 the Santa Barbara County Air Pollution Control District (District) issued Notice of Violation (NOV) No. 13338 (attached) for operating the Gore composting pilot project without a District permit, which is a violation of District Rule 201 and H&SC Section 42300. According to our records, the facility returned to compliance by ceasing operations and removing the equipment at the end of the 30-day pilot project.

The District reviewed the NOV case and this letter is an offer of settlement for civil penalties through the District's Mutual Settlement Program. More information on our program is available here:

www.ourair.org/biz/notices-of-violation-and-the-mutual-settlement-program.

The California Health and Safety Code specifies that the penalties for violations may include civil penalties for each day of each violation (*California Health and Safety Code Section 42402 et seq.*). We are proposing a reduced amount from that allowed in the California Health and Safety Code. This reduced amount takes into account the magnitude and severity of the violation, as well as the prior history of violations of a similar nature that have occurred at the facility and by the owner/operator.

In an effort to avoid the time and expense of litigation that would accrue to both parties, the District is willing to settle this matter through our Mutual Settlement Program for the sum of \$500.00, provided you agree to abide by the terms identified in the attached Violation Settlement Agreement.

If you wish to settle the matter on this basis, return the attached Violation Settlement Agreement, signed and dated, along with remittance of \$500.00, payable to the Santa Barbara County APCD, by 10/11/2023. Payment may be made by check or credit card, using the Credit Card Authorization Form-01C, available here: <https://www.ourair.org/wp-content/uploads/apcd-01c.pdf>. **Please identify NOV 13338 on the check or credit card authorization form.**

If the signed Violation Settlement Agreement is received by the above date, the District will provide you with the final Violation Settlement Agreement, signed by both Parties. If you return a signed Violation Settlement Agreement after the due date, the District reserves the right to decline to settle this matter and may take other appropriate enforcement action.

This letter constitutes an offer of settlement and is not a demand for payment. If you wish to provide additional evidence as to the facts in this case, you may contact me by 10/11/2023.

If I do not hear from you by the due date, the District may take further enforcement actions including referral of the matter to the Santa Barbara County District Attorney's Office for further civil law enforcement action.

If you have any questions, please contact me at (805) 979-8301.

Sincerely,

A handwritten signature in blue ink that reads "Glenn Gazdecki". The signature is written in a cursive style with a large initial 'G'.

Glenn Gazdecki, Mutual Settlement Officer
Compliance Division

Attachments: Violation Settlement Agreement
NOV 13338

cc: Electronic Mutual Settlement File – NOV 13338
Jeanette Gonzales-Knight
Kevin Brown
Kaitlin McNally
Eric Kett

September 27, 2023

VIOLATION SETTLEMENT AGREEMENT

This Notice of Violation Settlement Agreement (hereinafter “Agreement”) is made and entered into by and between the SANTA BARBARA COUNTY AIR POLLUTION CONTROL OFFICER (hereinafter “CONTROL OFFICER” or “DISTRICT”) and Mustang Renewable Power Ventures, LLC. (hereinafter “NOV RECIPIENT”). The CONTROL OFFICER and NOV RECIPIENT are collectively referred to herein as the “Parties”.

I. FACTUAL RECITALS

The CONTROL OFFICER pursuant to Health and Safety Code section 40752 enforces the provisions of parts 3 and 4 of Division 26 of the Health and Safety Code; all orders, regulations and rules adopted by the Santa Barbara County Air Pollution Control District Board; all variances and standards prescribed by the Santa Barbara County Air Pollution Control District Hearing Board (Hearing Board); and all permit conditions imposed pursuant to Health and Safety Code sections 42301 and 42301.10

The DISTRICT issued NOV RECIPIENT Notice of Violation 13338, which is the subject of this settlement. The Parties wish to resolve all disputes with respect to this Notice of Violation.

II. AGREEMENTS BY THE PARTIES

IN CONSIDERATION of the mutual promises described in this agreement, the Parties agree as follows:

1. NOV RECIPIENT agrees to and shall pay the DISTRICT a civil penalty of \$500.00.
2. NOV RECIPIENT shall submit payment of the civil penalty to the Santa Barbara County Air Pollution Control District at 260 N San Antonio Rd, Ste A, Santa Barbara, CA 93110. NOV RECIPIENT shall submit payment in full with the return of this Agreement signed by NOV RECIPIENT and submitted to the DISTRICT no later than 10/11/2023.
3. Upon full execution of this Agreement by the Parties and payment of civil penalties, pursuant to Health and Safety Code section 42400.7(a), such recovery precludes prosecution under Section 42400, 42400.1, 42400.2, 42400.3, 42400.3.5, or 42400.4 for the offenses identified in the NOV. However, that release does not relieve NOV RECIPIENT from complying with the regulations of other government agencies and it does not address or resolve violations of regulations which may be enforced by any other agency.
4. The DISTRICT reserves the right to prove the alleged violations in connection with any petition for a variance, permit revocation, or abatement order before the Hearing Board, and to rely on the alleged violations in connection with the determination of the appropriate penalty in the event similar Notices of Violation are issued in the future. Similarly, at any such time NOV RECIPIENT may raise any defenses or contrary proof concerning the facts of the alleged violations.

III. ADDITIONAL TERMS OR CONDITIONS

1. Time Is Of The Essence. Time is of the essence for each term and condition of this Agreement.

2. Authorization to Enter Into Agreement. Each Party executing this Agreement represents and warrants that it has been duly authorized to enter into this Agreement, and has full and complete authority to do so. Each Party expressly waives any defense to this Agreement based on any lack of authority to enter into and be bound by the terms of this Agreement.
3. Governing Law. This Agreement shall be interpreted, construed, governed and enforced under and pursuant to the laws of the State of California. Any action to enforce or interpret this Agreement shall be filed and/or maintained within the County of Santa Barbara, California.
4. Advice of Counsel. Each of the Parties, by the execution of this Agreement, represents that it has reviewed each term of this Agreement with its legal counsel, or has had the opportunity to do so, and further agrees that it shall not deny the validity of the Agreement on the grounds that it did not have advice of counsel.
5. Entire Agreement. This Agreement constitutes the entire Agreement between the Parties pertaining to resolution of the Notice of Violation. No supplement, modification, or amendment to this Agreement shall be binding unless executed in writing and signed by both Parties.
6. No Waiver of Default. Any waiver of default under this Agreement must be in writing and shall not be a waiver of any other default concerning the same or any other provision of this Agreement. No delay or omission in the exercise of any right or remedy shall impair that right or remedy or be construed as a waiver. A consent to or approval of any act shall not be deemed to waive or render unnecessary consent to or approval of any other or subsequent act.
7. Effective Date. The Effective Date of this Agreement shall be when fully executed by the Parties.
8. Attorneys' Fees. Each party shall bear its own costs, including attorneys' fees, in connection with the settlement of the Notice of Violation and this Agreement.

CONTROL OFFICER OF SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT

Signature: _____ DATE: _____

By: Glenn Gazdecki

Title: Mutual Settlement Officer

NOV RECIPIENT - Mustang Renewable Power Ventures, LLC.

Signature: _____ DATE: _____

Name: _____

Title: _____

July 11, 2023
VIOLATION SETTLEMENT AGREEMENT

This Notice of Violation Settlement Agreement (hereinafter “Agreement”) is made and entered into by and between the SANTA BARBARA COUNTY AIR POLLUTION CONTROL OFFICER (hereinafter “CONTROL OFFICER” or “DISTRICT”) and Mustang Renewable Power Ventures, LLC (hereinafter “NOV RECIPIENT”). The CONTROL OFFICER and NOV RECIPIENT are collectively referred to herein as the “Parties”.

I. FACTUAL RECITALS

The CONTROL OFFICER pursuant to Health and Safety Code section 40752 enforces the provisions of parts 3 and 4 of Division 26 of the Health and Safety Code; all orders, regulations and rules adopted by the Santa Barbara County Air Pollution Control District Board; all variances and standards prescribed by the Santa Barbara County Air Pollution Control District Hearing Board (Hearing Board); and all permit conditions imposed pursuant to Health and Safety Code sections 42301 and 42301.10

The DISTRICT issued NOV RECIPIENT Notices of Violation Nos. 12924, 13310, 13313, 13315, 13318, 13195, 13196, 13215, 13255, 13258, 13266, and 13312, which are the subject of this settlement. The Parties wish to resolve all disputes with respect to these violations.

II. AGREEMENTS BY THE PARTIES

IN CONSIDERATION of the mutual promises described in this agreement, the Parties agree as follows:

1. NOV RECIPIENT agrees to and shall pay the DISTRICT a civil penalty of \$18,250.
2. NOV RECIPIENT shall submit payment of the civil penalty to the Santa Barbara County Air Pollution Control District at 260 N San Antonio Rd, Ste A, Santa Barbara, CA 93110. NOV RECIPIENT shall submit payment in full with the return of this Agreement signed by NOV RECIPIENT and submitted to the DISTRICT no later than July 25, 2023.
3. Upon full execution of this Agreement by the Parties and payment of civil penalties, pursuant to Health and Safety Code section 42400.7(a), such recovery precludes prosecution under Section 42400, 42400.1, 42400.2, 42400.3, 42400.3.5, or 42400.4 for the offenses identified in the NOV. However, that release does not relieve NOV RECIPIENT from complying with the regulations of other government agencies and it does not address or resolve violations of regulations which may be enforced by any other agency.
4. The DISTRICT reserves the right to prove the alleged violations in connection with any petition for a variance, permit revocation, or abatement order before the Hearing Board, and to rely on the alleged violations in connection with the determination of the appropriate penalty in the event similar Notices of Violation are issued in the future. Similarly, at any such time NOV RECIPIENT may raise any defenses or contrary proof concerning the facts of the alleged violations.

III. ADDITIONAL TERMS OR CONDITIONS

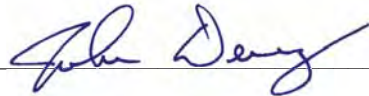
1. Time Is Of The Essence. Time is of the essence for each term and condition of this Agreement.
2. Authorization to Enter Into Agreement. Each Party executing this Agreement represents and warrants that it has been duly authorized to enter into this Agreement, and has full and complete authority to do so. Each Party expressly waives any defense to this Agreement based on any lack of authority to enter into and be bound by the terms of this Agreement.
3. Governing Law. This Agreement shall be interpreted, construed, governed and enforced under and pursuant to the laws of the State of California. Any action to enforce or interpret this Agreement shall be filed and/or maintained within the County of Santa Barbara, California.

- 4. Advice of Counsel. Each of the Parties, by the execution of this Agreement, represents that it has reviewed each term of this Agreement with its legal counsel, or has had the opportunity to do so, and further agrees that it shall not deny the validity of the Agreement on the grounds that it did not have advice of counsel.
- 5. Entire Agreement. This Agreement constitutes the entire Agreement between the Parties pertaining to resolution of the Notice(s) of Violation. No supplement, modification, or amendment to this Agreement shall be binding unless executed in writing and signed by both Parties.
- 6. No Waiver of Default. Any waiver of default under this Agreement must be in writing and shall not be a waiver of any other default concerning the same or any other provision of this Agreement. No delay or omission in the exercise of any right or remedy shall impair that right or remedy or be construed as a waiver. A consent to or approval of any act shall not be deemed to waive or render unnecessary consent to or approval of any other or subsequent act.
- 7. Effective Date. The Effective Date of this Agreement shall be when fully executed by the Parties.
- 8. Attorneys' Fees. Each party shall bear its own costs, including attorneys' fees, in connection with the settlement of the Notice(s) of Violation and this Agreement.

CONTROL OFFICER OF SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT

Signature: _____ DATE: _____
 By: Glenn Gazdecki
 Title: Mutual Settlement Officer

NOV RECIPIENT – Mustang Renewable Power Ventures, LLC

Signature:  DATE: 7/12/23
 Name: John Dewey
 Title: CEO & Managing

Jeanette Gonzales-Knight

From: Gloria Alvarez
Sent: Friday, November 3, 2023 11:08 PM
To: Jeanette Gonzales-Knight
Subject: FW: ProForma Working File 05162023
Attachments: MSB AP Aged-043023.xlsx

Hi Jeanette,

The attached was sent by E&Y during the review of MSB's financials.

Let me know if you want me to reach out to Elizabeth to forward the email from John.

Gloria

From: Elizabeth Moe <Elizabeth.Moe@ey.com>
Sent: Thursday, May 25, 2023 9:33 AM
To: Alvarez, Gloria <galvarez@countyofsb.org>
Cc: Meredith Willis <Meredith.Willis@ey.com>
Subject: RE: ProForma Working File 05162023

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Good morning Gloria – see attached for the aging payables file.

Thanks,
Liz

Elizabeth Moe | Senior Manager | Insurance & Federal Claims Services
Ernst & Young LLP
Cell: +1.510.882.4353 | Direct: +1.213.240.7459 | Elizabeth.Moe@ey.com

From: Alvarez, Gloria <galvarez@countyofsb.org>
Sent: Wednesday, May 24, 2023 6:07 PM
To: Elizabeth Moe <Elizabeth.Moe@ey.com>
Cc: Meredith Willis <Meredith.Willis@ey.com>
Subject: RE: ProForma Working File 05162023

Great, thank you.

Gloria

From: Elizabeth Moe <Elizabeth.Moe@ey.com>
Sent: Wednesday, May 24, 2023 5:02 PM
To: Alvarez, Gloria <galvarez@countyofsb.org>

Cc: Meredith Willis <Meredith.Willis@ey.com>

Subject: RE: ProForma Working File 05162023

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Gloria – request was sent!

Elizabeth Moe | Senior Manager | Insurance & Federal Claims Services

Ernst & Young LLP

Cell: +1.510.882.4353 | Direct: +1.213.240.7459 | Elizabeth.Moe@ey.com

From: Alvarez, Gloria <galvarez@countyofsb.org>

Sent: Wednesday, May 24, 2023 4:07 PM

To: Elizabeth Moe <Elizabeth.Moe@ey.com>

Cc: Meredith Willis <Meredith.Willis@ey.com>

Subject: RE: ProForma Working File 05162023

Hi Liz,

I was able to locate the attached MSB AP Aging Report as of June 30, 2022. Please have John provide the same PDF report as of April 30, 2023.

Thank you,
Gloria

From: Elizabeth Moe <Elizabeth.Moe@ey.com>

Sent: Wednesday, May 24, 2023 10:53 AM

To: Alvarez, Gloria <galvarez@countyofsb.org>

Cc: Meredith Willis <Meredith.Willis@ey.com>

Subject: RE: ProForma Working File 05162023

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Gloria,

Here is the AP listing John provided that shows the current payables but not the aging. Do you want us to follow-up for the AP aging?

Thanks,
Liz

Elizabeth Moe | Senior Manager | Insurance & Federal Claims Services

Ernst & Young LLP

Cell: +1.510.882.4353 | Direct: +1.213.240.7459 | Elizabeth.Moe@ey.com

MSB Investors, LLC
A/P Aging Summary
As of April 30, 2023

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121 - 150</u>	<u>151 - 180</u>	<u>> 180</u>	<u>TOTAL</u>
AB Energy USA, LLC	0.00	21,146.49	0.00	0.00	0.00	139,963.98	7,250.40	195,773.67	364,134.54
Agromin	15,871.52	15,455.00	19,322.81	0.00	0.00	0.00	0.00	0.00	50,649.33
Alliance Source Testing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11,405.00	11,405.00
American Express	0.00	28,588.41	0.00	0.00	0.00	0.00	0.00	0.00	28,588.41
Arthur J. Gallagher	0.00	0.00	0.00	0.00	519.00	-519.00	0.00	0.00	0.00
Avensys Solutions	0.00	622.00	0.00	0.00	0.00	0.00	0.00	0.00	622.00
Axiom Engineers	0.00	0.00	0.00	0.00	7,913.50	0.00	0.00	533,632.38	541,545.88
B Mortgage	5,000.00	5,000.00	0.00	0.00	0.00	0.00	0.00	0.00	10,000.00
Baker Tilly	4,200.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,200.00
Bejac	25,006.69	100.63	0.00	0.00	0.00	0.00	0.00	0.00	25,107.32
Bekon Energy Technologies	0.00	0.00	0.00	0.00	44,824.93	0.00	5,357.50	149,371.33	199,553.76
Brenntag Pacific, Inc.	0.00	14,282.22	0.00	0.00	0.00	0.00	0.00	0.00	14,282.22
Brownstein Hyatt	0.00	7,621.40	0.00	0.00	0.00	0.00	0.00	0.00	7,621.40
California Electric Supply	6,820.59	1,269.91	0.00	0.00	0.00	0.00	0.00	0.00	8,090.50
CE Schmidt Environmental Consultant	19,320.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19,320.00
CEMTEK Environmental	0.00	11,622.68	10,100.11	5,811.34	5,811.34	11,622.68	5,811.34	21,638.30	72,417.79
ConFab	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cypress Engineering	0.00	0.00	2,100.00	11,550.00	0.00	0.00	0.00	0.00	13,650.00
Danks Family-Trust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Deep Blue Integration, Inc.	30,079.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30,079.92
Delta Liquid Energy	50.02	1,578.74	1,755.65	0.00	0.00	0.00	0.00	0.00	3,384.41
Diani Building Corp	0.00	23,736.00	20,640.00	21,672.00	15,480.00	17,544.00	15,480.00	651,687.50	766,239.50
Ecoverse	0.00	0.00	0.00	34,311.11	0.00	0.00	0.00	0.00	34,311.11
Hamon Overhead Door	0.00	0.00	0.00	0.00	6,563.33	0.00	0.00	0.00	6,563.33
John Dewey	20,000.00	20,000.00	20,000.00	20,000.00	20,000.00	20,000.00	20,000.00	2,500.00	142,500.00
John Kular Consulting	0.00	10,805.00	5,815.00	0.00	0.00	0.00	0.00	0.00	16,620.00
Lee & Neal	0.00	5.25	109.01	116.89	116.89	122.14	116.89	7,620.92	8,207.99
Linde Equipment Inc.	453.70	807.08	3,798.97	0.00	0.00	0.00	0.00	0.00	5,059.75
Luna Farm Labor, Inc.	0.00	21,494.80	7,616.85	0.00	0.00	0.00	0.00	0.00	29,111.65
MarBorg Industries	1,110.00	41,060.10	39,976.10	38,589.10	58,514.72	29,064.60	70,927.43	122,402.79	401,644.84
MarBorg Recovery LP	0.00	562,603.64	0.00	0.00	0.00	0.00	0.00	0.00	562,603.64
Mark Schleich	1,700.00	3,600.00	0.00	0.00	0.00	0.00	0.00	0.00	5,300.00
McCormix Oil	13,684.48	21,261.00	8,377.40	0.00	0.00	0.00	0.00	0.00	43,322.88
McMaster Carr	0.00	0.00	11,522.09	0.00	0.00	0.00	0.00	0.00	11,522.09
Miles Chemical Company Inc.	0.00	0.00	0.00	0.00	672.04	0.00	0.00	-672.04	0.00
Mustang Renewable Power Ventures, LLC	14,038.97	18,315.18	19,015.40	22,083.11	19,736.73	21,816.32	19,141.13	184,730.12	318,876.96
North Western Energy Systems	11,866.27	15,373.80	0.00	0.00	0.00	0.00	0.00	0.00	27,240.07
Nossaman LLP	0.00	903.00	0.00	0.00	2,620.00	7,547.00	16,223.00	74,465.00	101,758.00
Odor No More, Inc.	0.00	3,534.65	0.00	0.00	0.00	0.00	0.00	0.00	3,534.65
Oilfield Environmental & Compliance, Inc.	995.00	0.00	0.00	1,638.00	0.00	0.00	0.00	0.00	2,633.00
OptimX Services, LLC	15,445.02	22,486.90	20,628.26	27,153.57	8,481.67	11,291.04	15,421.17	0.00	120,907.63
Pacific Petroleum	6,278.34	6,455.30	0.00	0.00	0.00	0.00	0.00	0.00	12,733.64
Patriot Environmental Services	2,100.00	10,500.00	14,700.00	8,400.00	2,100.00	9,072.00	4,536.00	53,928.00	105,336.00

MSB Investors, LLC
A/P Aging Summary
As of April 30, 2023

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121 - 150</u>	<u>151 - 180</u>	<u>> 180</u>	<u>TOTAL</u>
Perrys Electric Motors & Controls	0.00	0.00	2,510.26	0.00	0.00	0.00	0.00	0.00	2,510.26
Powerscreen of Northern California	0.00	3,371.63	3,584.76	0.00	0.00	0.00	0.00	0.00	6,956.39
Quincy Compressors	924.00	0.00	0.00	0.00	3,948.45	0.00	0.00	0.00	4,872.45
Quinn Company	513.19	11,198.49	0.00	0.00	0.00	0.00	0.00	0.00	11,711.68
Rain for Rent	0.00	2,302.20	0.00	0.00	0.00	0.00	0.00	0.00	2,302.20
Randolph Diesel Repair	4,154.71	5,842.10	0.00	0.00	0.00	0.00	0.00	0.00	9,996.81
Redwitz Advisors	0.00	281.75	0.00	0.00	0.00	0.00	0.00	0.00	281.75
Reece Plumbing	37.88	880.10	214.87	0.00	0.00	0.00	0.00	0.00	1,132.85
Rincon Consultants, Inc.	7,004.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,004.75
RMS Life Safety	0.00	0.00	0.00	0.00	1,020.00	2,380.00	0.00	4,760.00	8,160.00
Rolls Scaffold	88.07	5,871.00	0.00	0.00	0.00	0.00	0.00	0.00	5,959.07
Santa Barbara County APCD	23,269.90	9,993.51	0.00	0.00	0.00	0.00	0.00	0.00	33,263.41
SCS Engineers	20,754.53	23,770.68	13,803.45	0.00	27,306.90	19,374.99	27,492.15	21,029.13	153,531.83
Sheffield Financial	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Singer Lewak	0.00	0.00	0.00	7,000.00	0.00	0.00	0.00	0.00	7,000.00
Smith Electric	0.00	0.00	0.00	0.00	8,624.49	0.00	0.00	101,650.32	110,274.81
Soil Control Lab	0.00	698.00	0.00	0.00	0.00	0.00	0.00	0.00	698.00
Southern California Edison	12,401.40	-237,692.85	1,087.68	1,087.68	1,087.68	1,087.68	1,087.97	27,600.58	-192,252.18
The Fire Consultants, Inc.	0.00	0.00	0.00	12,800.00	0.00	0.00	0.00	0.00	12,800.00
USA Mobile Drug Testing	0.00	198.00	0.00	0.00	0.00	0.00	0.00	0.00	198.00
Van Dyk Recycling Solutions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,670.59	9,670.59
World Oil	95.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	95.00
TOTAL	<u>263,263.95</u>	<u>716,943.79</u>	<u>226,678.67</u>	<u>212,212.80</u>	<u>235,341.67</u>	<u>290,367.43</u>	<u>208,844.98</u>	<u>2,173,193.59</u>	<u>4,326,846.88</u>



DIANI BUILDING CORP.
CONTRACTORS

May 12, 2023

John Dewey
MSB Investors, LLC
17 Corporate Plaza Dr, Suite 200
Newport Beach, CA. 92660

Re: Tajiguas Resource Recovery Project

John,

Please review the following summary of outstanding accounts:

- Dave Poorbaugh – Outstanding balance as of April 30, 2023 is \$263,760.00. Dave will be available to MSB the week of May 22, 2023 to finish any loose ends you may need him for, but will no longer be available to MSB after Friday, May 26, 2023.
- RNG, LFG, and Miscellaneous MRF additions - Outstanding balance is \$3,000,000.00. You have agreed to pay interest on this as well, and since DBC is borrowing at higher rates now, we need this paid without waiting for your funds to be released from the County of Santa Barbara. We previously agreed to accept payment by the end of June 2023, which has nothing to do with your current County of Santa Barbara negotiations and/or sale of MSB.
- MSB Authorized extras and CMU additions – Outstanding Balance is \$1,296,950.47 – As stated above, we are expecting payment by the end of June 2023.

Please let us know your intentions on when we will be receiving payments.

Michael J. Diani
President
Diani Building Corp.

cc: Santa Barbara County, Resource Recovery & Waste Management Division



DIANI BUILDING CORP.
CONTRACTORS

October 19, 2023

John Dewey
MSB Investors, Inc.
17 Corporate Plaza, Ste 200
Newport Beach, CA 92660

Re: Tajiguas Resource Recovery Project (TRRP)
Notice of Failure to Make Payment

Dear Mr. Dewey,

In accordance with Section 13.3.1 - Failure to Make a Payment to Subcontractor When Due, of our Construction Agreement for the subject project, Diani Building Corp. hereby provides notice of your failure to make timely payment in the amount of \$4,601,732.30 (invoice summary attached). This amount does not reflect any outstanding amounts due and payable by the County of Santa Barbara.

Be advised that in accordance with the same above noted Construction Agreement Section, if you fail to make payment "...within (5) Business Days following the notice of failure to pay..." Diani Building Corp. will pursue any and all remedies available to it in accordance with Section 13.4 of our Construction Agreement.

We hope that we can resolve this issue and avoid an unnecessary and protracted legal process.

Diani Building Corp.

Michael J. Diani
President

cc: Michael Minchella, Esq.
Scott D. McGolpin, P.E.
Director - County of Santa Barbara Public Works Department
123 E. Anapamu Street
Santa Barbara, CA 93101

DIANI BUILDING CORP

Customer: MSB INVESTORS, LLC

Job: TAJIGUAS RESOURCE RECOVERY PROJECT

A/R Open Items

Invoice No.	Date	Amount	Description
2102943	2/28/2021	3,000,000.00	TRRP Enhancements
2202113	2/28/2022	503,769.67	Added Scope
2202057Rev	3/31/2022	13,216.00	Site Management - Poorbaugh
2204069	4/30/2022	16,048.00	Site Management - Poorbaugh
2205075	5/31/2022	12,285.83	Added Scope
2205078	5/31/2022	20,768.00	Site Management - Poorbaugh
2206083	6/30/2022	17,936.00	Site Management - Poorbaugh
2207097	7/31/2022	14,160.00	Site Management - Poorbaugh
2208103	8/31/2022	7,064.00	Wood Chipper Switchgear Pad
2208109	8/31/2022	23,736.00	Site Management - Poorbaugh
2209116	9/30/2022	22,704.00	Site Management - Poorbaugh
2210127Rev	10/31/2022	793,180.80	Added Scope
2210134	10/31/2022	15,480.00	Site Management - Poorbaugh
2211151	11/30/2022	17,544.00	Site Management - Poorbaugh
2212164	12/31/2022	15,480.00	Site Management - Poorbaugh
2301194	1/31/2023	21,672.00	Site Management - Poorbaugh
2302213	2/28/2023	20,640.00	Site Management - Poorbaugh
2303225	3/31/2023	23,736.00	Site Management - Poorbaugh
2304255	4/30/2023	20,640.00	Site Management - Poorbaugh
2305280	5/31/2023	21,672.00	Site Management - Poorbaugh
TOTAL DUE		4,601,732.30	

ATTACHMENT E
Non-compliance Impacts to County Projects

Jeanette Gonzales-Knight

From: Campos Bernal, Norma
Sent: Tuesday, September 19, 2023 11:36 AM
To: Joddi Leipner
Cc: Kevin Brown; Jeanette Gonzales-Knight
Subject: RE: NOP comments

Hi Joddi,

I only have 30 days from date of submittal to accept or reject the application. Once I do, the substitute meeting must be held within one year prior to the date EA accepted.

My options at this point are the following:

- a. Hold my own EA meeting at the MRF and face delay or possible non-concurrence from CalRecycle for ongoing violations or
- b. Operator can rescind the application until a later date when compliant.

Please let me know how you would like to proceed.

Thank you,



Norma Campos Bernal, REHS
Senior Environmental Health Specialist
Environmental Health Services Division
Public Health Department
County of Santa Barbara
225 Camino del Remedio,
Santa Barbara, CA 93110
P 805.681.4942 | F 805.681-4901
E norma.camposbernal@sbcphd.org

From: Joddi Leipner <jleipner@countyofsb.org>
Sent: Tuesday, September 19, 2023 11:02 AM
To: Campos Bernal, Norma <NCamposBernal@sbcphd.org>
Cc: Kevin Brown <kevbrown@countyofsb.org>; Jeanette Gonzales-Knight <jgonzal@countyofsb.org>
Subject: RE: NOP comments

Hi Norma,

The meeting is not just an information meeting it is the public hearing on the Draft Subsequent Environmental Impact Report (EIR) pursuant to the State and County's CEQA guidelines. At the meeting we review the findings of the EIR and then accept public comment. We are planning on doing a hybrid meeting (in person at the MRF education room and

using Zoom). Written responses to public comments (received verbally or in writing) are then provided in the Final EIR. The Draft EIR has to be available for comment for a minimum of 45 days and the public hearing must occur within the 45 day period. We are hoping to release the draft EIR next week (September 28th) and then hold the public meeting one month later (October 26th) to allow the public some time to review the document before the meeting and then still have approximately 15 days after the meeting to continue to receive comments before the comment period closes. I have confirmed that the Planning and Development hearing officer, our EIR consultant, and our staff are all available on October 26th. Our EIR consultant is not available to the week before and moving the hearing up further becomes a bit more difficult logistically.

For the Reconfiguration Project in 2009, the LEA used this same environmental hearing for their substitute meeting. We included info in our public notice and the LEA attended the meeting. If you participate in this meeting and we include info on our public notice wouldn't it qualify as a substitute meeting as long as the SWFP application is accepted as complete and correct by October 26, 2024?

I do completely understand the ongoing concerns regarding the CMU odor violations but our engineering staff indicates that we need to move forward with the Capacity Increase project now as we are running out of capacity and the CEQA process and permitting both take a significant amount of time. We are releasing the EIR almost a year after the 10/24/22 early consultation meeting. My understanding is that the Gore Cover has been ordered and the contract for the installation of the equipment to operate the cover system is going to the Board on 10/3 so this hopefully shows progress in addressing the odor issues at the CMU.

The decision to submit the application yesterday was not made by me but again I believe necessary to meet the overall timeline for project implementation.

I am happy to discuss further and facilitate in anyway using our notice and environmental hearing for your required meeting our only constraint is that we would have to include the information in the notice by end of day tomorrow as we need to run a draft by the Independent on Thursday and then formally submit the ad for publication on Friday for the Independent on 9/28.

Regards,
Joddi

Joddi Leipner
Senior Engineering Environmental Planner
Resource Recovery and Waste Management
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101
(805) 882-3614 (Work)
(805) 364-1056 (Mobile)

From: Campos Bernal, Norma <NCamposBernal@sbcphd.org>
Sent: Tuesday, September 19, 2023 10:15 AM
To: Joddi Leipner <jleipner@countyofsb.org>
Cc: Kevin Brown <kevbrown@countyofsb.org>; Jeanette Gonzales-Knight <jgonzal@countyofsb.org>
Subject: RE: NOP comments

Good morning Joddi,

I am reaching out about the dates set for informational meeting scheduled for Oct. 26, 2023. Is there a reason why this date was scheduled? Can you provide information on the purpose of this meeting. I was anticipating that I could use

this meeting for the permit revision, but according to CCR27-21660.4, the meeting must be held within one year prior to the date EA accepted the application package as complete and correct.

Furthermore, you may recall during our meeting on October 24, 2022 regarding the Tajiguas landfill capacity increase project discussion with yourself, Jeanette and the water board. I brought up the issue of pending violations as a reason to defer concurrence by CalRecycle.

There are still several ongoing violations that will probably not be mitigated until the GORE system has been installed and given additional time to eliminate compost odors.

Why was the revision submitted yesterday ?

Thank you,



Norma Campos Bernal, REHS
Senior Environmental Health Specialist
Environmental Health Services Division
Public Health Department
County of Santa Barbara
225 Camino del Remedio,
Santa Barbara, CA 93110
P 805.681.4942 | F 805.681-4901
E norma.camposbernal@sbcphd.org

From: Leipner, Joddi <jleipner@countyofsb.org>
Sent: Thursday, April 20, 2023 8:16 AM
To: Campos Bernal, Norma <NCamposBernal@sbcphd.org>
Subject: RE: NOP comments

Good Morning Norma,

Thank you for the comments.

Joddi

Joddi Leipner
Senior Engineering Environmental Planner
Resource Recovery and Waste Management
130 E. Victoria Street, Suite 100
Santa Barbara, CA 93101
(805) 882-3614 (Work)
(805) 364-1056 (Mobile)



Scott D. McGolpin
Public Works Director

Leslie Wells
Deputy Director

March 9, 2023

Norma Campos Bernal
Santa Barbara County Public Health Department
Environmental Health Services Division
225 Camino del Remedio
Santa Barbara, CA 93110
Via email: NCamposBernal@sbcphd.org

**SUBJECT: Withdrawal of Permit Modification Dated March 18, 2022
Tajiguas Resource Recovery Project and Sanitary Landfill
SWIS # 42-AA-0015**

Dear Ms. Campos Bernal,

The County of Santa Barbara, Department of Public Works, Resource Recovery and Waste Management Division (RRWMD) wishes to withdraw the permit modification that was submitted on March 18, 2022 and requested the name change for the Tajiguas Resource Recovery Project and Sanitary Landfill. It is our intent to submit a Joint Technical Document Amendment at a later time, pursuant to changes that are required for the enrollment of the Tajiguas Landfill under the Water Board General Order for Active Class III Landfills in the Central Coast Region (Order No. R3-2020-0001). These proposed changes will not include a modification to the permit itself.

We appreciate all of your support and guidance on this project. Please feel free to reach me at 805-882-3627 with any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Jeanette Gonzales-Knight'.

Jeanette Gonzales-Knight, PE
Compliance Manager

Cc: Leslie Wells, County of Santa Barbara, Department of Public Works
Christina Wilder, County of Santa Barbara, Department of Public Works

