



Northern Recycling, LLC

PO BOX 177 • NAPA, CALIFORNIA 94559

Dear Ms. Juhler,

Subject: Odor Impact Mitigation Plan – Fall Implementation and Long-Term Improvements

I am writing to share Northern Recycling's updated approach to mitigating odor impacts associated with our operations. As part of our ongoing commitment to environmental stewardship and being a responsible neighbor to the community, we are implementing a targeted strategy this fall to enhance odor control and operational resilience.

Existing Odor Control Measures

Northern currently maintains a robust aeration system across its wastewater ponds, including:

- **Pond 1:** 2 subsurface aerators for a total of 12 diffusers
- **Pond 2:** 2 subsurface with a total of 12 diffusers and 1 surface aerator
- **Pond 3:** 3 subsurface aerators

During the summer, aeration resources have been strategically redistributed to Ponds 1 and 2, in response to reduced water levels (less than 1 foot) in Pond 3.

Planned Enhancements for Fall and Beyond

We are investing in several infrastructure and operational upgrades to strengthen odor control, including:

- **Aeration System Expansion:**
 - 1 additional subsurface aerator with 6 diffusers and 1 surface aerator for Pond 1
 - 2 additional subsurface for a total of 12 diffusers and 1 surface aerator for Pond 2
 - 1 subsurface aerator in the sump pit that feeds Pond 1, to pre-aerate high-strength effluent
 - 1 subsurface aerator in the sump pit that feeds Pond 2, to pre-aerate high-strength effluent
- **Electrical Upgrades:** Supporting the new aerators with necessary electrical infrastructure
- **Continuous Monitoring:** Installation of dissolved oxygen (DO) sensors in Ponds 1 and 2 for real-time tracking and control. The purpose of the DO monitoring is to ensure a minimum of 0.50 mg/l and ideally 1.0 mg/l DO is maintained in the ponds in accordance with the facilities odor impact minimization plan (OIMP) and waste discharge requirements (WDRs).



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Northern is committed to maintaining adequate DO in the ponds and the real time monitoring will be used to either increase (through addition of more aeration infrastructure) or reduce (by turning aerators off to save electricity). Should the additional infrastructure proposed above fail to maintain DO at or above 0.5 mg/L for more than 14 consecutive days in conjunction with an odor complaint attributable to the composting facility, Northern will install an additional aeration unit or other County approved measure (such as disposal to the wastewater treatment plant or application of a product such as hydrogen peroxide). This process will be repeated until such time as adequate DO can be maintained.

- **Effluent Volume Management:**

- Construction of a pipeline to the Davis Wastewater Treatment Plant enables offsite water disposal
- This reduces overall contact water onsite, allowing us to consolidate aeration efforts in Ponds 1 and 2
- Importantly, this eliminates the need to apply pond water to compost piles during adverse atmospheric conditions practice previously linked to odor complaints

Compost Operations Enhancements

- We are maintaining a **thicker biofilter layer in our CASP systems** to better capture and treat odorous emissions.
- Northern is actively investigating additional best management practices (BMPs) and odor control technologies to further improve outcomes. To this end, Northern will provide an annual summary update to the County of the monitoring results, odor observations, responses and infrastructure improvements and proposed changes to the BMPs, due July 1 of each year.

Future Grant Opportunities

With the sources of odors at the landfill in general being organic in nature, either the compost facility or the in-vessel digester, Northern suggests a partnership with the County to apply for the next available CalRecycle organics grant cycle to help fund more advanced odor control infrastructure.

We believe this comprehensive plan represents a meaningful step toward reducing odor-related impacts from our operations and reflects our commitment to continuous improvement. We welcome any feedback you may have and look forward to continuing collaboration with your team.

NORTHERN RECYCLING



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Sincerely,
Will Kelley