



March 2, 2015

Reply to: 1225 8th Street, Suite 595  
Sacramento, CA 95814

***Via Electronic Mail Only***

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State Water Resources Control Board  
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SUBJECT: Comment Letter – General Order for Composting Operations

Dear Ms. Townsend:

The California Association of Sanitation Agencies (CASA) and Central Valley Clean Water Association (CVCWA) appreciate the opportunity to review and submit comments on the Draft Environmental Impact Report (Draft EIR) and Proposed General Waste Discharge Requirements for Composting Operations (Draft Order). In this letter, CASA and CVCWA provide the following joint comments and request clarification regarding inconsistencies in definitions associated with biosolids and sewage sludge, prohibitions regarding the use of biosolids, and certain monitoring requirements.

CASA is a statewide association of cities, counties, special districts, and joint powers agencies that provide wastewater collection, treatment, water recycling, and biosolids management services to more than 90 percent of the sewered population of California. CASA members are focused on helping California achieve its laudable mandates and goals by 2020. These include: (1) providing 33 percent of the state's energy needs from renewable sources; (2) reducing carbon dioxide equivalent emissions to 1990 levels; (3) reducing the carbon intensity of transportation fuel used in the state by 10 percent; and (4) recycling 75 percent of the solid waste generated in the state.

CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to

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millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law.

## **I. CASA and CVCWA Request Clarification**

There are two important issues that require further confirmation and/or clarification. These issues are as follows:

1. Please confirm that the Draft Order does not apply to any biosolids composting facilities if they have individual waste discharge requirements (WDRs) or conditional waivers of WDRs.
2. The issue with respect to sub-Class B biosolids needs further clarification. Based on our review of the Draft Order, sub-Class B biosolids would not be allowed as a feedstock for composting facilities subject to this Draft Order. However, we continue to assume that sub-Class B biosolids *would* continue to be allowed as a feedstock for composting facilities subject to individual WDRs or conditional waiver of WDRs. Please confirm our understanding with respect to sub-Class B.

## **II. Definitions**

The Draft Order in Provision 4.f would prohibit the discharge of sludge “including but not limited to sewage sludge, water treatment sludge, and industrial sludge” as a feedstock at a composting operation, including a discharge from the storage thereof. (Draft Order, p. 17.) Sewage sludge is then defined in the Draft Order to not include biosolids that meet the criteria in Table 3 of 40 Code of Federal Regulations section 503.13. Biosolids, as defined in the Draft Order, are an allowable feedstock for composting operations. (Draft Order, p. 5.) Biosolids is defined to mean sewage sludge that meets certain requirements, including Class A biosolids meeting the pollutant concentration limits in Table 3 of 40 Code of Federal Regulations section 503.13; Class B biosolids meeting the pollutant concentration limits in Table 1 of 40 Code of Federal Regulations section 503.13; and, Exceptional Quality biosolids as defined in General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities. (Draft Order, p. A-2.)

Moreover, Finding 26 states that biosolids used as a feedstock must, at a minimum, meet concentrations listed in Table 1 of 40 Code of Federal Regulations part 503 and Class B pathogen requirements.

Based on our reading of the various definitions and provisions, there is inconsistency with what can be accepted as a feedstock. It appears that biosolids that are Class B biosolids

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and meeting Table 1 of 503.13 would be acceptable as a feedstock, but those that are Class B and meeting Table 3 of 503.13 would not be acceptable. Clarification is requested on this issue.

### **III. Prohibition Number 9**

The Draft Order would prohibit the use of biosolids, as defined by the Draft Order, from being an additive or amendment in composting material. The Draft Order does not provide any explanation or reasoning as to why biosolids are prohibited from use as an additive or amendment. This prohibition seems unreasonable considering that biosolids is defined to include only Class A, Class B, and Exceptional Quality biosolids, and thus the quality of the biosolids that could be used as an additive or amendment is high. We recommend that Prohibition 9 be deleted.

### **IV. Definition of Wastewater Detention Pond**

The Draft Order includes a broad definition for wastewater detention pond, and states that it is “an excavated or diked area designed to capture and hold any process wastewater, leachate, contaminated non-process wastewater or wash-water.” (Draft Order, p. A-8.) While CASA and CVCWA understand that this is likely intended to apply only to wastewater detention ponds associated with the composting operation, the broad definition here (along with associated monitoring requirements) could cause confusion where the composting facility is part or a component of a POTW facility. To avoid confusion, we recommend that the Draft Order be revised to clearly indicate that wastewater detention ponds referenced in the Draft Order are only those ponds that are specifically associated with a composting operation, and do not include wastewater detention ponds otherwise associated with a POTW facility.

### **V. Monitoring Requirements**

We are concerned that the monitoring requirements under A.3.b of Attachment B would be onerous in the event that a composting operation is unable to obtain characterization of biosolids from the generating entity. In such a case, the Draft Order would require sampling of “each delivery.” This amount of sampling is extensive, and is not necessary to ensure protection of water quality. Accordingly, we respectfully request that this monitoring requirement be re-evaluated.

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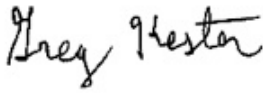
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Again, we appreciate the opportunity to provide these comments. Please contact Greg Kester at [gkester@casaweb.org](mailto:gkester@casaweb.org), or Debbie Webster at [eoofficer@cvcwa.org](mailto:eoofficer@cvcwa.org) should you have questions with respect our comments above.

Sincerely,

California Association of Sanitation Agencies



Greg Kester  
Director of Renewable Resource Programs

Central Valley Clean Water Association



Debbie Webster  
Executive Officer