

Orange County Sanitation District

10844 Ellis Avenue, Fountain Valley, CA 92708

714.962.2411 • www.ocsewers.com

February 26, 2015

Public Comment
General Order for Composting Operations
Deadline: 3/2/15 by 12:00 noon

commentletters@waterboards.ca.gov
VIA ELECTRONIC MAIL

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



SUBJECT: Comment Letter – General Order for Composting Operations.

The Orange County Sanitation District (OCSD) appreciates the opportunity to comment on the proposed General Waste Discharge Requirements for Composting Operations (General Order). OCSD is a publicly owned wastewater treatment agency, operating two treatment plants, one in the city of Fountain Valley and the other in the city of Huntington Beach. For more than 60 years, OCSD has been safely collecting, treating, disposing, and reclaiming wastewater generated by 2.5 million people living and working in Orange County. Each day OCSD treats approximately 200 million gallons of wastewater, recycles 70 million gallons into the Groundwater Replenishment System, and produces approximately 750 wet tons of Class B biosolids per day to be beneficially used.

To maintain sustainability of OCSD's biosolids management program, OCSD utilizes several different biosolids management options, which include composting. A portion of our Class B biosolids is managed by a privately owned composting vendor that is regulated by the SWRCB's Waste Discharge Requirements and subject to the proposed General Order. In reviewing the proposed General Order, OCSD has identified an inconsistency concerning the concentration limits criteria imposed on biosolids as a feedstock, which needs to be clarified to prevent the misinterpretation that Class B biosolids may not be used as a feedstock at composting operations.

To clarify, Finding # 26 of the General Order requires biosolids that are used as a feedstock to comply, at a minimum, to meet the Class B biosolids ceiling concentration limits listed in Table 1 of 40 CFR part 503. The discrepancy arises in the definition of "Sewage Sludge" referenced in Attachment-A, which states that "Sewage Sludge" does not include biosolids that meet criteria in Table 3 of 40 CFR section 503.13, which is a criteria for Class A biosolids. To further complicate the issue, the General Order defines "Biosolids", also referenced in Attachment-A, as sewage sludge that has been treated, tested, and meets Class A biosolids (40CFR Part 503 Table 3), Class B biosolids (40CFR Part 503 Table 1), and Exceptional Quality (EQ) biosolids as defined in General Waste Discharge Requirements Order No. 2004-0012-DWQ and A Plain English Guide to the EPA Part 503 Biosolids.

To prevent a misinterpretation that Class B biosolids cannot be used as feedstock in composting operations, OCSD requests that the definition of "Sewage sludge" should be revised to the following:

"Sewage Sludge - Any solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a municipal wastewater treatment facility. It includes solids removed or used during primary, secondary, or advanced wastewater treatment processes. It does not include grit or screening material generated during preliminary treatment

Serving:

Anaheim

Brea

Buena Park

Cypress

Fountain Valley

Fullerton

Garden Grove

Huntington Beach

Irvine

La Habra

La Palma

Los Alamitos

Newport Beach

Orange

Placentia

Santa Ana

Seal Beach

Stanton

Tustin

Villa Park

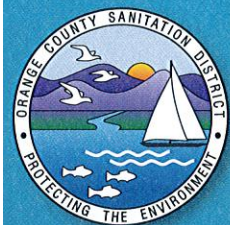
County of Orange

Costa Mesa
Sanitary District

Midway City
Sanitary District

Irvine Ranch
Water District

Yorba Linda
Water District





Jeanine Townsend, Clerk to the Board
Page 2
February 26, 2015

of domestic sewage at a municipal wastewater treatment facility. Sewage sludge does not include biosolids that meet the criteria in **Table 3 Table 1** of 40 Code of Federal Regulations section 503.13.”

This proposed revision conforms to Finding #26 of the proposed General Order that biosolids used as a feedstock to comply at a minimum with the ceiling concentrations limits in Table 1 CFR 503.

Thank you for the opportunity to provide input on the proposed General Order. If you have any questions or require additional information, please contact my staff Tom Meregillano at (714) 593-7457 or tmeregillano@ocsd.com.

James E. Colston
Environmental Compliance Manager

TM:JC:jb
H:\dept\eng\790\Manager\LETTERS\20150226_OCSD_Letter_Compost_GO.docx