02/27/2015

Comment Letter – General Order for Composting Operations

1) As a layperson, I found it difficult to understand everything required in the General Waste Discharge for Composting Operations. It will be necessary to hire an individual to either train or implement the requirements. Has this cost been taken in to account for the compost operator? The selling of compost has a low profit margin and added fees by the State can not necessarily be passed on to the consumer.

2) With that said, why can't the Industrial Storm Water Pollution Prevention Plan and the General Waste Discharge for Composting Operations be integrated together?

3) Our company leases land from a landfill which has invested in an anaerobic digester. We work together to recycle the food material by using this material and turning it into compost. Under additives and amendments it states "no more than 30 percent combined, on a total volume basis of the following" ……anaerobic digestate. Do I understand that to mean we can have no more than 30 percent of the food material at our compost site?

4) An issue I found confusing at the public meeting that I attended on February 13, 2015 was that numerous time it was mentioned (by a representative of the water board) that the local water agency could decide that the compost operation did not have to follow the state requirements. Did I totally misunderstand? Because, if I didn't that would add even more confusion to the compost operator.

5) Will there be some grants or subsidies by the State to cover the cost of these pond and pads that will be required in the General Waste Discharge for Composting Operations? I am sure it has been brought to your attention on numerous occasions that the State of California may be an environmentally friendly state but it is not a business friendly state. The regulatory fees that our company is required to pay has increased through the years. And it is only by the ability to increase business that we will be able to stay in business.

Thank you, Kate