



March 2, 2015

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

Dear Ms. Townsend:

Sonoma Compost Co. (SCC) has been composting since 1985. In 1993 we started the municipal yard debris composting program for Sonoma County. Our program has been instrumental in achieving the waste diversion goals for Sonoma County as well as improving the soil health of our local soils.

Over the years we have closely followed the stakeholder process regarding the California General Waste Discharge Requirements for Composting Operations (General Order) and participated in the workshops. SCC appreciates the opportunity to respond to the formal comment period.

While we can respond here to some of the problems we have with the General Order, we request that the Board will allow for more time to give the industry an opportunity to develop more specific language to replace text we have problems with.

Finished Product

Finished product is currently considered waste in the General Order. This means that the area used for finished product will be included in the total footprint considered in the order. Since this is finished product that is applied to gardens and agricultural applications throughout the State we request that this category will be exempted from the rule.

Additives and Amendments

Additive versus amendment definitions and tier limits remain unclear and need to be clarified.

Food Material Definition

The food material definition requires clarification. In addition, California's newly implemented organic commercial recycling law needs to be taken in account to ensure that composters can fully utilize food scrap feedstock.

Compliance Schedule Timeline

The compliance schedule must reflect a realistic time for application and implementation for existing and new facilities. The analysis has been based on a 20 year amortization. Many operators, including SCC, do not have such a timeline in their contract. A 5-year contract prohibits financially to come in full compliance.

Alternative Requirements and Specifications for Pond Construction

The current specifications are too restrictive and do not provide flexibility for alternatives. Thought should be given to better correlate size of the ponds to the actual risk and the economics associated with that.

Economic Impact

As reflected above, we have concerns about the economic impact of the General Rule. Appendix D, "Economic Considerations", does not take in account shorter contract times, the need for operating pads and potential outhauling of contact water to treatment plants, which will be a reality in certain events. SCC encourages you to further work with the industry as a whole to revisit these impacts

SCC thanks you for considering these concerns and we look forward to further communication to improve on the Rule. Please feel free to contact me with any further questions.

Sincerely,



Will Bakx