

Comment Letter

General Order for Composting Operations



1. Is it true the G.O. does not to apply to any existing composting facilities with individual WDRs or WDR waivers or if it is included on a NPDES permit?

2. There is inconsistency in the GO between the definitions of sewage sludge, biosolids, and what is allowed as a feedstock.
 - a. Prohibition 4.f. states: "Sludge, including but not limited to sewage sludge..... "is prohibited for use as a feedstock.
 - b. Appendix A Definition of biosolids states: Biosolids – Sewage sludge that has been treated, tested, and meets any of the following:
..... Class B biosolids meeting the pollutant concentration limits of Table 1 of 40 Code of Federal Regulations Section 503.13 (This is the ceiling concentration limits)
 - c. Appendix A Definition of Sewage Sludge states: Sewage Sludge - Sewage Sludge does not include biosolids that meet the criteria in Table 3 of 40 Code of Federal Regulations section 503.13" (And thus presumably does include those solids only meeting the less stringent Table 1 Ceiling concentrations).
 - d. In the Scope of This General Order Section – Item 28. a. defines allowable feedstocks. Tier II allowable feedstocks include: "Biosolids (Class A, B, and/or EQ): as defined in Appendix A. Thus we have confusion regarding the allowance of Class B biosolids which meets the table 1 ceiling limit but not the table 3 pollutant concentration limit as a feedstock. The definition of biosolids seems to include such a material but so does the definition of sewage sludge. The former is allowed as a feedstock under the GO and the latter is not.

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