

Association of Compost Producers
California Compost Coalition
California Refuse Recycling Council
Californians Against Waste
CR&R Environmental Services
Harvest Power of California, Inc.
Inland Empire Disposal Association
Integrated Waste Management Consulting, LLC
Los Angeles County Waste Management
Association Recology
Republic Services, Inc.
Solid Waste Association of Orange County
Sonoma Compost Co., LLC
Waste Management
Zanker Recycling

March 02, 2015

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



Dear Ms. Townsend:

The companies and organizations listed above are stakeholders in the development of a robust compost infrastructure to meet California's waste diversion goals and beneficial reuse of organic material, including owners and operators of composting facilities in California and environmental advocates. An estimated doubling of growth in our sector is necessary to meet the State's goal of 75% diversion by 2020.

Our coalition has participated in the informal and now formal stakeholder process regarding the California General Waste Discharge Requirements for Composting Operations (General Order) for composting facilities and was in attendance at the recent State Water Resources Control Board (SWRCB) public workshop on February 13, 2015 regarding the General Order and draft Environmental Impact Report (EIR). Since the workshop many of us have had the opportunity to participate in private meetings with SWRCB staff to discuss the remaining critical issues.

Several outstanding issues necessitate industry-corroborated technical language as you develop the next iteration of the General Order. *Our coalition is committed to supporting you in this process and to offer detailed consensus language and feedback within 30 days on the following areas of concern.*

Alternative Requirements and Specifications for Pond Installation

Our coalition remains concerned that the current specifications are too restrictive and do not provide flexibility for alternative installation, including alternative monitoring requirements. The size of the ponds required under this order do not correspond to the risk posed by these facilities and would be prohibitively expensive for many operators.

Additives and Amendments

Additive versus amendment definitions and tier limits remain unclear, especially as it pertains to restrictions on anaerobic digestate use.

Food Material Definition

The food material definition requires clarification and should align with the additive and amendment definitions as they relate to the use of anaerobic digestate. Furthermore, the definition needs to take into account California's newly implemented organic commercial recycling law to ensure that operators can maximize the use of food waste feedstock.

Compliance Schedule Timeline

The compliance schedule must reflect a reasonable time for application and implementation for existing and new facilities, taking into account the time necessary for required capital and operational costs.

Economic Impact

Ultimately we feel that Appendix D, "Economic Considerations", does not capture the full cost of compliance with this order, and therefore requires a reanalysis, especially as it pertains to the aforementioned issues. We are eager to provide you with more technical detail so that a full economic impact analysis can be completed.

We thank you for your time and your willingness to take note of industry concerns. The General Order is a critical component to meeting State goals around waste diversion and greenhouse gas reductions, which our industry supports. We look forward to future communication on specific language recommendations from the coalition. If you have questions regarding this letter, please do not hesitate to contact any of the stakeholders listed below.

Sincerely,

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Members, State Water Resources Control Board

Secretary Matt Rodriguez, California Environmental Protection Agency

Director Carroll Mortenson, CalRecycle

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