

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI

MAYOR

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

BOARD OF PUBLIC WORKS MEMBERS

KEVIN JAMES
PRESIDENT

MONICA RODRIGUEZ
VICE PRESIDENT

MATT SZABO
PRESIDENT PRO TEMPORE

MICHAEL R. DAVIS
COMMISSIONER

BARBARA ROMERO
COMMISSIONER

BUREAU OF SANITATION

ENRIQUE C. ZALDIVAR
DIRECTOR

TRACI J. MINAMIDE
CHIEF OPERATING OFFICER

VAROUJ S. ABKIAN
ADEL H. HAGEKHALIL
ALEXANDER E. HELOU
ASSISTANT DIRECTORS

LISA B. MOWERY
CHIEF FINANCIAL OFFICER

1149 SOUTH BROADWAY, 9TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-2210
FAX: (213) 485-2979
WWW.LACITYSAN.ORG

March 2, 2015

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



COMMENTS ON DRAFT EIR FOR GENERAL ORDER FOR COMPOSTING OPERATIONS

LA Sanitation (LASAN) appreciated the opportunity to comment on the State Water Resources Control Board's Proposed General Waste Discharge Requirements for Composting Operations (Draft Order) and related Draft Environmental Impact Report (DEIR) released for public review and comments on January 13, 2015.

LASAN is responsible for managing municipal solid waste collected from more than 750,000 households. Residents are provided with three bins, including blue for recyclables, Green for yard trimmings and black for non-recyclable materials. Some residents, upon request, are provided with brown bins for horse manure collection. With many successful landfill diversion programs, including greenwaste processing, the City of Los Angeles (City) has reached a landfill diversion rate of 76.4%.

LASAN collects an average of 1800 tons per day of residential yard trimmings. The majority of the material (approximately 80%) is delivered to private contractors for processing and delivery to end users, but up to 380 tons per day is processed through two Bureau operated facilities: the Harbor Mulching Facility, which processes up to 80 tons per day of green trimmings originating in the San Pedro/Harbor and West Los Angeles area; and the Lopez Canyon Environmental Center located in Lake View Terrace, which processes up to 300 tons per day of green trimmings (100 tons per week of horse manure from the Valley collection districts and up to 150 tons per day of bulky brush from commercial tree trimmers). All collected greenwaste is processed and reused as mulch and compost by farmers, nonprofit organizations and residents. None of our green waste is used as an alternative daily cover at landfills. LASAN also owns and operates the Griffith Park Composting Facility where dropped leaves, lawn clippings, and trimmings from acres of the Park are mixed with zoo manure and biosolids and composted. The final compost product is then used in Griffith Park, thus completing the full cycle of recycling.

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

Recyclable and made from recycled waste



Based on our review of the DEIR and the Draft Order dated January 6, 2015, we have the following comments:

A. DRAFT EIR

1. We believe there will be a consequential economic impact. The Economic Analysis in the EIR states that there will be an inconsequential impact on the composting sector by implementation of the new Order. Existing composting operations such as LASAN will potentially need to construct new catchment ponds lined with a 40 mil geomembrane, and install pan Lysimeters. Operationally, technical staff will be required to perform quarterly inspections, monthly lysimeter checks, quarterly sampling, laboratory and field analysis of pH, Oxygen, and Dissolved Solids, and an Annual Monitoring report. These are operational and capital expenditures that will create economic barriers, which will inhibit growth in the public and private compost sector.
2. Besides the economic impact stated above, we agree with all the other remaining DEIR findings.

B. DRAFT ORDER:

1. Application Process:
 - a) Section 37 exempts those facilities that operate under its own individual WDRs. We recommend that existing facilities that have been in operation for over 5 years and have individual permits with no violations, be grandfathered in and be exempt in perpetuity. Existing facilities that are covered by a CalRecycle Solid Waste Permit or a waste discharge requirements issued by a Regional Water Quality Control Board or the State Water Resources Control Board are required to monitor for possible groundwater contamination. Groundwater contamination from these facilities (if detected) would require remediation.
 - b) Section 49b requires the design and operation of detention ponds to contain and reuse wastewater and storm water. This requirement creates an impediment on facilities with limited space availability especially on landfills where construction of detention ponds is prohibited. We recommend that only liquid released from the composting piles be collected in detention ponds during dry weather and appropriately discharged. During wet weather and episodes of heavy storm where the detention pond(s) capacity is reached, allowance must be made for surface water discharge.

2. Prohibitions:

Prohibition 9 excludes the use of biosolids as an additive or amendment with no explanation. This prohibition creates some confusion as to the quantitative limitations of using biosolids as feedstock since the definitions of Additive and Amendment state in part, that they shall not be considered as feedstock.

C. DEFINITIONS:

3. Chipping and Grindings:

Chipping and Grinding Facilities and Operations - Facilities or operational areas that do not produce compost, but mechanically reduce the size or otherwise engage in the handling of "green material." Each load of "green material" must be removed from the site within 48-hours from receipt, unless the Discharger has received written permission from the Local Enforcement Agency allowing the "green material" to remain onsite for up to 7 days.

This definition is not practical. There must be sufficient material available on site to efficiently chip the material (thus minimizing emissions due to frequent start-up of grinding equipment). We recommend that the 48 hour limit be changed to 7 days.

4. Depth to Groundwater:

The vertical distance measured, in feet, from the ground surface to the first encountered groundwater.

The vertical distance should be allowed to be determined by interpolation using existing well information rather than measured, which would require actual drilling.

Again, we appreciate the opportunity to comment on the proposed General Order and DEIR. If you need additional information or would like to discuss these comments further, please do not hesitate to contact Khalil M. Gharios, P.E., SRPCD Manager at (213) 485-2210.

Sincerely,



ENRIQUE C. ZALDIVAR, Director
LA Sanitation

c: Alex Helou, LASAN
Nichole Bernson, CD 12
Greg Good, Mayor's office
Rosalia Rojo, LASAN
John Hamilton, LASAN
David Thompson, LEA