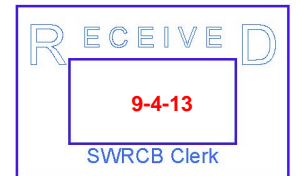




LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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GAIL FARBER, CHAIR
MARGARET CLARK, VICE - CHAIR

September 4, 2013



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Dear Ms. Townsend:

COMMENT LETTER – CEQA – COMPOSTING GENERAL ORDER NOP

The Los Angeles County Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board) Notice of Preparation (NOP) and Notice of Public Scoping Meeting, Environmental Impact Report for General Waste Discharge Requirements for Composting Operations (Order), which was initially released for public review and comments on July 19, 2013. The Task Force recognizes and commends the State Water Board's efforts to adopt general waste discharge requirements for composting operations in California for use by the Regional Water Quality Control Boards at their discretion.

Based on our review of the draft working concepts of the Order dated August 16, 2013, we have the following comments:

General

- Recommend incorporating measures to insure that the proposed Order would be consistent with the Clean Air Act and Clean Water Act requirements under the purview of other State, regional, special districts (such as sanitation and flood control districts), and local jurisdictions. As an example, since the Air Quality Management Districts and Air Pollution Control Districts will play a regulatory and enforcement role in monitoring any odor complaints, it is imperative that their input also be incorporated into this process.
- Recommend there be a clear distinction in the definitions between "feedstock" and "finished compost."
- Recommend measuring quantities by mass rather than by volume. This reduces the subjective nature of converting volume quantities as proposed to mass quantities using a bulk density factor. Bulk densities will vary at different facilities and with different load combinations.

- All pilot facilities should have clear parameters and requirements regarding the duration of the pilot program. It is recommended that once the facility's pilot permit expires the appropriate Local Enforcement Agency must then re-evaluate the effectiveness of the pilot program, and the owner/operator must then reapply for a permanent permit.
- Recommend using the previously established State Water Board hydraulic conductivity of 1×10^{-6} cm/s or less on all graded surfaces on site OR justify the adequacy of hydraulic conductivity of 1×10^{-5} cm/s considering that feedstock are not limited to green materials only. Compost operations should be required to have emergency inspections, in addition to their annual inspection, after disasters to determine the integrity of the all liners, berms, vessels, and drainage systems for all tiers.
- Recommend that both the draft programmatic Environmental Impact Report and the draft Order address issues regarding ponding water with respect to vectors, odor, and treatment of runoff. Deaths resulting from the infection of both the West Nile and the Hanta Virus have been recorded in California as recent as the summer of 2012 and 2013.

In addition to the comments provided above, we recommend the State Water Board find mechanisms to ensure that chipping and grinding operations would also be subject to similar levels of regulations as composting facilities.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Ms. Jeanine Townsend
September 4, 2013
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We appreciate your consideration our comments and look forward to working with you in developing an effective statewide order for composting facilities. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste management Task Force and
Council Member, City of Rosemead

VVT:ts

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cc: Mr. Matthew Rodriquez, Secretary, CalEPA
Ms. Felicia Marcus, Chair, SWRCB
State Water Resources Control Board (Thomas Howard, Lisa Babcock, Scott Couch,
Brianna Bergen)
CalRecycle (Caroll Mortensen, Ken DaRosa, Mark De Bie, Howard Levenson,
Brenda Smyth, Robert Holmes, Georgianne Turner)
California Air Resources Board (Mary Nichols)
California Department of Food and Agriculture (Annette Jones)
South Coast Air Quality Management District (Mohsen Nazemi)
Antelope Valley Air Quality Management District (Eldon Heaston)
Each Member of the Los Angeles County Integrated Waste Management Task Force