



## NORTHERN DISTRICT

June 14, 2019



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Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**RE: Comment Letter – CEQA - Composting General Order NOP**

Dear State Water Resources Control Board,

The California Refuse Recycling Council (CRRC), Northern District is a trade association representing 34 solid waste collection and recycling companies across Northern California. Many of our members are engaged in organics management, including composting. CRRC members continue to support the organic waste reduction goals of SB 1383 by expanding facilities, building new infrastructure, and processing more organics. Nevertheless, a myriad of regulatory barriers and growing costs have made this effort exceptionally challenging.

CRRC members engaged considerably in the original stakeholder process to adopt the General Order and address water quality protection at composting facilities with a more streamlined permitting process. They have since invested millions to come into compliance with the General Order, achieving more organics diversion from California landfills and playing a critical role in advancing environmental health efforts. CRRC Northern District supports the standards of the General Order in order to protect water quality at composting facilities.

We appreciate the opportunity to comment on the Supplemental Environmental Impact Report (SEIR) and the proposal to amend the General Waste Discharge Requirements for Composting Operations (General Order). It is critical that any General Order amendments continue to protect water quality at new and existing compost facilities, regardless of the site of the facility.

Composting, whether occurring on an agricultural site or a commercial site, may pose a groundwater risk if not managed correctly. We strongly support all composting sites be held to the same water quality standards. We offer the following comments regarding the proposed amendments to the Agricultural Composting exemption.

- Unlimited transfer of agricultural materials, such as manure, into sites with no limitations on the size of the facility, and which may not have the standards outlined in the General Order, poses a potential groundwater risk. At a minimum, these facilities should be no larger than the Tier 1 limit of 25,000 cubic yards.

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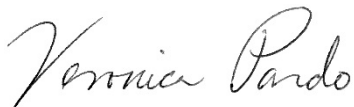
Phone: 916-444-CRRC (2772) | Fax: 916-442-0623 | [www.crrcnorth.org](http://www.crrcnorth.org)  
Affiliate of West Coast Refuse & Recycling Coalition (WCRCR)

- Expanding the export limit five-fold, from 1000 to 5000 cubic yards, may disrupt the market and commercial viability of commercial composters, especially as we work to meet the ambitious goals of SB 1383 and manage 20 million additional tons of organic waste annually. We support the initial limit of 1000 cubic yards.
- We remain concerned and seek details on what is meant by expanding the exemption to include “non-agricultural sites.” How is this defined and how will it be managed, especially with unlimited transfer as proposed?

The regulatory process to draft and adopt the original General Order was rigorous and driven by the need to protect water quality. The compost industry invested enormously in achieving these standards and continues to manage substantial costs as we work to build the infrastructure to divert 20 million additional organic waste tons annually by 2025. The sheer volume of this effort underscores the necessity of the General Order, as existing infrastructure is expanded, and new facilities are built.

We look forward to working with you to uphold an Agricultural Composting exemption that meets the necessary standards to protect water quality while managing organics to reduce our state’s methane emissions. Please do not hesitate to reach out to our governmental affairs team with any questions.

Sincerely,



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