



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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GAIL FARBER, CHAIR
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September 11, 2012

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

Dear Ms. Townsend:

**COMMENTS ON THE DRAFT WATER QUALITY ORDER NO. DWQ-2012-XXXX
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS
FOR THE DISCHARGE OF WASTES AT COMPOST MANAGEMENT UNITS**

The Los Angeles County Integrated Waste Management Task Force (Task Force) appreciates the opportunity to provide the following comments on the State Water Resources Control Board's (SWRCB) Draft Water Quality Order No. DWQ-2012-XXXX, Statewide General Waste Discharge Requirements for the Discharge of Wastes at Compost Management Units (CMUs), dated August 6, 2012 (Order):

- **Findings, Threshold Volume, A.4.d (page 2)** – To be consistent with the State Department of Resources Recycling and Recovery's (CalRecycle) numeric thresholds, it has been indicated that the SWRCB will use a value of 12,500 cubic yards for total volume of "any combination of feedstocks, additives, amendments, active or stabilized compost as the numeric threshold used as part of the tier assessment under this Order." Has the SWRCB conducted any scientific studies to ensure protection of water quality using the said threshold?
- **Findings, Delegation of Authority, A.25 (page 8)** – The proposal needs to be expanded to clearly define the terms "modification" and "revision."
- **Findings, General Discharge Specifications, C.1 (page 10)** – Please provide information on criteria used, and technical evaluations conducted by the SWRCB in establishing the "additives" threshold limit of 30%.
- **Findings, General Discharge Specifications, C.7 (page 11)** – It is recommended that samplings be reported in accordance with the Reporting Requirements specified in Section I.3 and/or Section I.5 of the Order, as appropriate.

- **Findings, Prohibitions, D.1c (page 12)** – According to Attachment A of the proposed Order, “wastewater refers collectively to leachate, washwater, and/or process stormwater.” The prohibition/discussion on “liquid wastes” needs to be revised to be consistent with the definition of “wastewater” as listed in Attachment A.
- **Findings, Prohibitions, D.1.e (page 12)** – The term, “Municipal solid waste,” needs to be defined here or in Appendix A of the proposed Order.
- **Findings, Design Specifications, Tier 1, E.1 (pages 13-15)** – As proposed, a volume threshold limit of 12,500 cubic yards of feedstocks has been established for “Tier 1” of any CMU. The 12,500 cubic yards of feedstocks is comparable to the size of a football field where feedstocks have been stored to a depth of approximately six feet. Considering that a compost facility may incorporate one or many CMUs and ensure surface and groundwater quality, it is recommended that working surfaces of containment structures be designed to provide for a hydraulic conductivity of 1×10^{-6} cm/s or less.
- **Findings, Design Specifications, Tier 3, E.3 (pages 17 to 19)** – As proposed, Tier 3 CMU Dischargers proposing to use feedstocks specified in Findings No. A-4.a. of the proposed Order must advocate, among other things, that “existing containment structures and/or current management practices at the CMU are equally protective of the waters of the state, as those specified for Tier 2 CMUs...(emphasis added).” We strongly recommend that the word “advocate” be revised to “substantiate through engineering and technical evaluations.” Otherwise, we recommend using a hydraulic conductivity of 1×10^{-6} cm/s or less on all graded surfaces on site and containment structures.
- **Findings, Site Conditions and Maintenance Requirements, G.1 (page 19)** – In addition to regular inspections, it is recommended that the Discharger also be required to conduct emergency inspections of CMUs after disaster events to evaluate the integrity of liners, berms, vessels, and drainage systems for all tiers.
- **Findings, Reporting Requirements, I.1.a & b (page 20)** – The term “reasonable timeframe” needs to be defined. We recommend a time period such as 30 days within which the Discharger must furnish the required information.
- **Attachment A, Definitions (page iii)** – “Composting” is being defined as “the process in which solid materials are decomposed in the presence of oxygen under controlled (emphasis added) conditions...” This definition conflicts with Public Resource Code 40116.1, which states “composting means the controlled or uncontrolled (emphasis added) biological decomposition of organic wastes.”

- **Monitoring and Reporting Program, B.2, Wastewater Detention Pond Monitoring (pages 4 and 5)** – We recommend that the monitoring program also include measures to avoid potential problems associated with ponding water such as vectors and odors, as well as discuss any treatments of runoff.

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

Pursuant to the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended) and Chapter 3.67 of the Los Angeles County Code, 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.

We appreciate the SWRCB's consideration of 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

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cc: Mr. Matt Rodriquez, Secretary, CalEPA
Mr. Charles Hoppin, Chair, State Water Resources Control Board
State Water Resources Control Board (Thomas Howard, Lisa Babcock, Scott Couch
and Roger Mitchell)
CalRecycle (Caroll Mortensen, Mark Leary, Howard Levenson and Brenda Smyth)
California Air Resources Board (Mary Nichols)
California Department of Food and Agriculture (Annete Whitford)
Each Member of the Los Angeles County Integrated Waste Management Task Force