

**Kerry Elliott - Centralized digester WDR**

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**From:** Paul Martin <paulwud@callatg.com>  
**To:** 'David Sholes' <dsholes@waterboards.ca.gov>  
**Date:** 04/11/2011 5:28 PM  
**Subject:** Centralized digester WDR

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Hi David –

From my reading of the WDR it appears that a couple of things cause me questions.

- (1) Is there no allowance for the digested solids to go to uses besides land application? I envision an opportunity, albeit some time down the road; that this kind of material could go to a biomass plant of some kind, burner, gasifier, etc. This could be an on-site operation, which would seem to be allowed, but may equally be somewhere off-site. Is there provision to handle this?
- (2) It also appears that there is a prohibition to applying the digested product to any land other than dairy land. Even the dairy Order allows for off-site use on non-dairy cropland. Maybe I read it incorrectly, but can you please clarify for me?

Will read further, but these are my current questions.

Thanks –

Paul