

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 22/23/24 September 2010**

**Response to Written Comments for County Sanitation Districts of Los Angeles County,
Westlake Farms Composting Facility
Kings County
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 22/23/24 September 2010, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting waste discharge requirements for construction and operation of a 177.5-acre municipal sewage sludge (biosolids) composting facility. This document contains responses to comments received from interested parties regarding the proposed Order circulated on 12 July 2010. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by noon on 13 August 2010 to receive full consideration. Comments were received by the due date from:

1. County Sanitation Districts of Los Angeles County

The comments are summarized below, followed by Central Valley Water Board staff responses.

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

COMMENT 1: Stormwater regulations do not apply to the proposed facility because it does not drain to a water of the United States.

RESPONSE: Finding No. 18 has been revised to read:

“State Water Resources Control Board Order No. 97-03-DWQ, National Pollutant Discharges Elimination System (NPDES), General Permit No. CAS000001, specifies waste discharge requirements for discharges of stormwater associated with industrial activities, excluding construction activities, and requiring submission of a Notice of Intent by industries to be covered under the permit. Waste disposal for storage and treatment, including composting facilities, is considered an industrial activity requiring submission of a Notice of Intent for coverage under the General Permit if stormwater is to be discharged off-site to jurisdictional waters of the United States.

To be consistent with State and federal law regarding stormwater, the Discharger needs to either:

- a. Comply with the State Water Resources Control Board Order No. 97-03-DWQ, NPDES, General Permit No. CAS000001 (General Permit), or;
- b. Comply with an individual Order issued pursuant to the CWC, or;

- c. Provide sufficient evidence that all stormwater will be retained without discharge from land owned or controlled by the Discharger. This evidence may be provided by submitting a *Notice of Non-Applicability* form associated with the General Permit.

The Discharger submitted a Notice of Non-Applicability dated 15 July 2010.”

COMMENT 2: The surface impoundment will not need to be sampled because it will not contain water long enough to be of concern.

RESPONSE: The surface impoundment sampling requirement in the Monitoring and Reporting Program has been revised to read:

“At any time during a semiannual monitoring period, if water is present in a storm water surface impoundment for longer than 14 days, the water shall be sampled and analyzed for total concentrations of metals listed in Title 22 CCR §66261.24(a)(2)(A). Samples do not need to be obtained more often than once during any semiannual monitoring period.”

COMMENT 3: The sampling frequency for constituents of concern is stated to be every five years, but Table II of the Monitoring and Reporting Program indicate a semiannual sampling frequency.

RESPONSE: The “semiannual” sampling frequency for the constituents of concern was a typographical error and has been changed to “every 5 years” on Table II of the Monitoring and Reporting Program.