



JOINT STATE OFFICE

March 2, 2015



VIA E-MAIL & U.S. POST

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

RE: GENERAL ORDER FOR COMPOSTING OPERATIONS

Dear Ms. Townsend,

The California Refuse Recycling Council (CRRC) is a trade association of haulers, processors, recyclers, and composters with members throughout California. Our members have been engaged in organics processing and composting for years, and strongly support the State's goal to recycle, compost, or reduce 75 percent of solid waste in landfills by 2020.

The CRRC appreciates the opportunity to comment on the California General Waste Discharge Requirements for Composting Operations (General Order) for composting facilities and the Draft Environmental Impact Report (EIR). We were in attendance at the State Water Resources Control Board (SWRCB) public workshop on February 13, 2015, and since the workshop have had the opportunity to meet privately with SWRCB staff.

As part of a larger coalition effort, CRRC would like to provide Water Board staff with workable technical language and recommendations in the following areas of concern as the next iteration of the General Order is drafted.

- **Alternative Requirements and Specifications for Pond Installation** – the size of ponds required are excessively stringent and economically prohibitive
- **Additive and Amendment Definitions and Tier Limits** – we are particularly concerned as definitions and limits pertain to the use of anaerobic digestate
- **Food Material Definition** – definition is unclear and must support other regulatory definitions as they relate to the management of food waste in California
- **Compliance Schedule Timeline** – we are concerned that the compliance timeline does not take into account the full capital and operational costs the General Order would impose

Ultimately, we remained concerned that the General Order is cost-prohibitive, especially at a time when growth in our sector is so crucial to meet State greenhouse gas reduction and waste diversion

1121 L Street, Suite 505 | Sacramento, California 95814

Phone: 916-444-CRRC (2772) Fax: 916-442-0623 www.crrcstate.org

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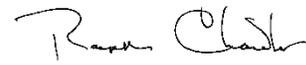
goals. We are eager to continue this dialogue with you, along with other coalition stakeholders. We would like to see the General Order developed along with the Regional Water Boards and harmonized with the policy objectives of CalRecycle, especially as they pertain to the new compostable material handling regulations.

We thank the SWRCB and staff for the opportunity to provide recommendations to the proposed General Order, as well as the opportunity to meet privately with staff to clarify several issues. We look forward to continuing to work with you, and other stakeholders, to finalize workable regulations that meet superior organics management goals in our State.

Sincerely,



KATHRYN LYNCH
Regulatory Affairs
lynch@lynchlobby.com



RALPH CHANDLER
Regulatory Affairs
rca@ralphchandler.com

CC: Director Caroll Mortenson, CalRecycle