



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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Public Workshop (8/27/12)  
Compost Order  
Deadline: 9/12/12 by 12 noon

September 12, 2012

Mr. Roger Mitchell, P.G.

VIA ELECTRONIC MAIL

Engineering Geologist  
Division of Water Quality  
State Water Resources Control Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123-4340



Subject: State Water Resources Control Board Tentative General Waste Discharge Requirements at Compost Management Units under No. DWQ-2012-XXXX

Dear Mr. Mitchell:

The California Association of Sanitation Agencies (CASA) is pleased to submit comments on the Tentative General Waste Discharge Requirements at Compost Management Units (CMUs) currently under consideration for adoption. CASA represents more than ninety percent (90%) of the sewered population of California. CASA has long been a proactive leader on wastewater treatment, recycled water, air quality, biosolids management, and climate change mitigation issues. Many of CASA's members manage their biosolids via composting as regulated by individual NPDES permits and WDRs in accordance with federal, state, and local regulations. CASA's comments target statewide concerns and request clarification regarding the applicability of the proposed General Order to CMUs with individual permits and WDRs.

The proposed General Order is unclear as to whether CMUs composting biosolids under existing individual permits or WDRs are exempted. CASA believes they should be exempt and requests that this be made explicitly clear. The projects authorized by individual permits and WDRs are only issued after thorough site specific CEQA review and environmental and public health evaluation. Such facilities should not now be subject to duplicative coverage under this Order given the extent of the evaluation already performed in issuing those permits, and the actions needed to achieve compliance with them.

Please let me know if you have any questions or need further clarification. Your consideration of this request is respectfully appreciated.

Sincerely,

Greg Kester  
Biosolids Program Manager  
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cc: Johnny Gonzales – SWRCB Biosolids Coordinator  
Roberta Larson, Executive Director – CASA