

September 7, 2012



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

**RE: General Waste Discharge Requirements for the Discharge of Wastes at Compost Management Units (CMUs) – Draft Statewide Order**

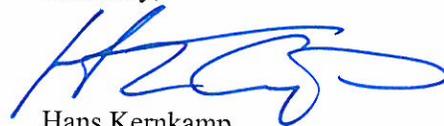
Dear Ms. Townsend:

The Riverside County Waste Management Department (RCWMD) has reviewed the draft Statewide Order (Order) and offers the following comments for consideration:

- As currently proposed in the Order, when a new/existing CMU already regulated by a WDR enrolls as a Tier 3 facility, a NOI and accompanying technical report would be required. It is recommended that the technical report requirement be waived, provided the technical and environmental information contained in the facility's current WDR is valid and adequate.
- The Order does not clearly address how its stormwater control requirements would interface with those under the National Pollutant Discharge Elimination System (NPDES) permit program for the CMUs.
- The numerous monitoring, reporting, and notification timelines are excessive, making implementation and compliance difficult to achieve. The Order should streamline these requirements for ease of understanding and implementation.

We appreciate the opportunity to participate in drafting the Order. Should you have any questions regarding the above comments, please contact Mr. Sung Key Ma of my planning staff at (951) 486-3283 or [sma@co.riverside.ca.us](mailto:sma@co.riverside.ca.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "Hans Kernkamp".

Hans Kernkamp  
General Manager-Chief Engineer

HWK:JRM:RR:SKM/skm

cc: Roger Mitchell, San Diego Regional Water Quality Control Board (via email)  
Ryan Ross/Sung Key Ma, RCWMD

PD 125853v2