



WESTERN PLACER
WASTE MANAGEMENT AUTHORITY

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

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September 12, 2012

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



RE: DRAFT GENERAL WASTE DISCHARGE REQUIREMENTS FOR THE DISCHARGE OF WASTES AT COMPOST MANAGEMENT UNITS

Dear Ms. Townsend:

Western Placer Waste Management Authority (Authority) staff has reviewed the California State Water Resources Control Board's (Water Board) 2012 Draft General Waste Discharge Requirements for the Discharge of Wastes at Compost Management Units (WDR) released for public comment in August 2012.

The Authority is a regional agency comprised of Placer County and the cities of Lincoln, Rocklin and Roseville. The Authority provides recycling and waste disposal services to these communities as well as the cities of Auburn and Colfax and Town of Loomis. The Authority owns and operates a Materials Recovery Facility (MRF) designed to separate, process and market recyclable materials removed from the municipal solid waste stream. The residual waste is disposed in the adjacent Western Regional Sanitary Landfill (WRSL), also owned and operated by the Authority. The Authority's facilities also include a green waste composting operation, and thus would be significantly negatively impacted by the draft WDR, as follows:

- At a time when public agencies are continuing to experience negative effects from the economic recession, the added compliance measures identified in the draft WDR would place additional undue financial burden on the Authority. The Authority has great concern whether the potential capital and operating costs associated with the WDR would be commensurate with the potential environmental benefit; many of the potential increased costs would be administrative and would not result in a direct improvement to water quality. The Authority requests the Water Board conduct cost-benefit analysis identifying the need for this WDR in addition to existing regulations governing composting operations.
- The draft WDR duplicates many of the monitoring and reporting requirements of the stormwater regulatory process. As currently written in the WDR, Findings A.4.b.iv and 12

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appear inconsistent. Finding A.4.b.iv implies that composting conducted at facilities issued a Water Board permit (e.g. Industrial General Permit) will be conditionally exempt from the requirements of the Order while Finding 12 states that some compost management units may be required to obtain coverage under both this Order and the General Storm Water Permit. The Authority requests that the Water Board clarify whether composting facilities such as the Authority's, which are co-located with a MRF or landfill and already report under Order 97-09-DWQ, are exempt from this Order.

- Finally, the Authority requests the Water Board include in the WDR a conditional exemption for facilities that do not discharge compost leachate, similar to the Draft General Industrial Storm Water Permit's No Exposure Certification.

We respectfully request that the Water Board consider these concerns before adopting the WDR as currently drafted.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. L. Zimmerman', written over a horizontal line.

William L. Zimmerman, P.E.
Deputy Executive Director