



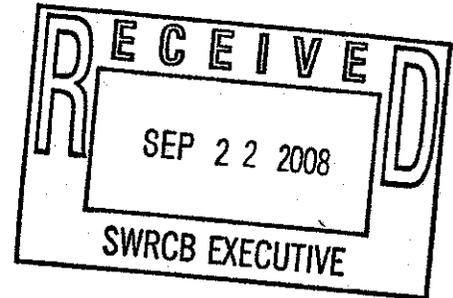
Public Comment
San Diego-Conditional Waiver
Deadline: 9/22/08 by 12 noon

CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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September 21, 2008

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



Subject: Comment Letter – San Diego – Revised Conditional Waivers of Waste Discharge Requirements

The California Association of Sanitation Agencies (CASA) is pleased to provide comments on the proposed revisions of conditional waivers of Waste Discharge Requirements in the San Diego Region. CASA represents more than ninety percent of the sewered population of California and has been a leader in shaping state and federal legislation on wastewater and biosolids management for many years.

CASA has concerns over restrictions and prohibitions relative to sewage sludge being introduced into compost operations for animal waste, green waste, and combinations thereof. Specifically compost operations outlined in Chapter 4 Attachment A in Table 4-4, sections 3d, 4f, 5c, and 8b and in Appendix D Table D-1 in the same numbered sections prohibit the introduction of sewage sludge into compost facilities or the use of the finished product unless it is demonstrated that there will be no potential adverse affect on water quality. This would appear to be in direct conflict with the State Water Board's General Order for biosolids and the Integrated Waste Boards policy on biosolids compost operations. Such compost operations and use are already regulated under NPDES permits, WDR's, and/or CIWMB permits. Numerous co-composting operations are in operation in California and produce an exceptional product that is much sought after by the farming and landscaping industries. The compost is also routinely used on golf courses.

Research has been exhaustive at Universities across the nation and has documented the tremendous benefits that biosolids and biosolids compost provide to soils and crops. Recycling biosolids compost to land enhances soil and crop production. Improvements such as increased soil tilth, moisture retention, and soil fertility are realized through the addition of organic matter and valuable nutrients such as nitrogen and phosphorus, as well as other constituents vital for plant health. The improved moisture retention realized through land application of biosolids and biosolids compost provides a critical benefit to water scarce regions of the US, such as in California. Agricultural application of compost also replenishes depleted carbon reserves in soil and reduces our society's carbon footprint. Many California soils including those in the San Diego Region would benefit from these additions of organic matter and nutrients provided by biosolids compost as opposed to inorganic fertilizer. The United States Environmental Protection Agency developed risk and technologically based regulations for the land application of biosolids, which have been mimicked and refined by the State Water Board as published in their 2004 General Order.

CASA respectfully requests that the State Board approve the WDR revisions only if they are modified to delete the references to "sewage sludge". The documentation has already been provided and articulated in the General Order that if managed properly there will be no adverse affect on water quality. It would be an onerous requirement if it had to be documented on a case by case basis by anyone wishing to co-compost with animal waste or green waste.

Please feel free to contact me at 916-844-5262 or at gkester@casaweb.org for any further clarification or with any questions.

Sincerely,

Greg Kester
Biosolids Program Manager

Ensuring Clean Water For California