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County of Fresno

**DEPARTMENT OF PUBLIC HEALTH
EDWARD L. MORENO, M.D., M.P.H.
DIRECTOR-HEALTH OFFICER**

October 20, 2010

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Mr. David Sholes, Senior Engineering Geologist
California Regional Water Quality Control Board
1685 E Street
Fresno, California 93706-2007

Dear Mr. Sholes:

Subject: Tentative Waste Discharge Requirements General Order for Dairies with Manure Anaerobic Digester or Co-Digester Facilities

The Fresno County Department of Public Health, Environmental Health Division has received the Notice for the subject Tentative Order, and offers the following comment.

Prohibition #18 in the Tentative Order prohibits all Dischargers from using mammalian tissue in a co-digester. Solid waste regulations classify dairy manure anaerobic digester and co-digester facilities as composting facilities if compostable feedstock is being handled. Title 14 California Code of Regulations, Section 17855.2 prohibits the composting of mammalian tissue, except when from the food service industry, grocery stores, or residential food scrap collection, or as a part of a research composting operation. Our office has received a proposal for two dairy manure anaerobic co-digesters to be built using food byproducts as a secondary feedstock that might include food waste scraps containing mammalian tissue. Will the operator/Discharger be in conflict with prohibition #18 if the solid waste regulations allow exceptions for mammalian tissue in a composting operation?

Thank you for the opportunity to comment on the Tentative Order. If you have any questions regarding the comment in this letter, please contact me at (559) 445-3271.

Sincerely,

Hoa Gip, R.E.H.S.
Environmental Health Specialist
Environmental Health Division

HG/sja

Enclosure

cc: Glenn Allen, Supervising Environmental Health Specialist

Dedicated to Public Health

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