

Roger Mitchell - windrow moisture

From: Cold Creek Compost <coldcreek@willitsonline.com>
To: RMitchell@waterboards.ca.gov
Date: 11/18/2011 2:37 PM
Subject: windrow moisture

Roger,

You asked how we manage our windrows for moisture. The answer is as follows:

The material we compost is first laid out in windrows and remains in those windrows for about two weeks, turned about every second day. During the rainy season we generally do not add any water, relying on rain for the necessary moisture. During the dry time of year we add during the first couple of turns as much water as the material will hold, and continue to add water while the material remains in the windrowed condition, as it remains a challenge to maintain optimal moisture conditions during that time of year.

In regards to the interesting windrow management technique you described at the last meeting, it probably would, if properly implemented, reduce the amount of runoff from a compost pad. But I question whether it would be worth the trouble and additional expense. Obviously a good portion of the composting material would have to be kept at less than optimal moisture conditions, so the technique would require more pad area because of the longer time required to achieve a finished product. It could be that the additional pad required would offset any reduction in runoff from the original pad.

I do not see how such a technique could possibly be a substitute for an impermeable pad. There would still be leachate generated between the windrows from spilled material on the ground and from the windrows themselves. Then one must not forget the leachate generated from watering the windrows during the dry season. Remember that all compost when properly moistened generates some leachate.

In regards to the proposed fourth tier; it is not necessary and for the sake of simplicity alone I do not think one should be added. The purpose of the proposed order is to protect water quality and it makes no sense to allow a facility to pollute because it might pollute less than another. I say might because 12,500 yards is a lot of material, about the size of one of our aerated static piles. I know how much leachate one of those piles is capable of producing, and it is quite a considerable amount.

Again, I feel that chip & grinds and agricultural operations need to be included in the order with the exemption set at 500 to 600 yards of material on site for all. If a facility cannot afford to be engaged in an activity that will pollute the water – then it should not be conducting such activity.

As for the message that I continue to hear from greenwaste composters – that greenwaste leachate is somehow benign and of no concern, I think you now know better and that greenwaste composters are actually the most able to afford to keep the water clean.

Another argument that I continue to hear is that if it becomes more expensive to compost, materials will be driven to less expensive and perhaps less desirable means of disposal. The answer to that problem is to regulate those less desirable means – not to give composters a competitive advantage by allowing them to pollute. Such a regressive solution would not be good for the environment or the

industry.

I know I've given you a bit more than you asked for, but hope you will seriously consider my comments when crafting the final order.

Martin Mileck

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