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Carpinteria SD
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City of Barstow
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City of Carlsbad
City of Chula Vista
City of Corona W&P
City of Coronado DPS
City of Culver City
City of Downey
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City of Oxnard
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City of Santa Monica
City of Sierra Madre
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City of Ventura
City of Vista
County of San Bernardino W/S
County of San Diego
Crescenta Valley WD
Crestline San. District
Eastern Municipal WD
El Toro Water District
Elsinore Valley MWD
Encina WA JPA
Fairbanks Ranch CSD
Fallbrook PUD

September 13, 2012

Mr. Roger Mitchell, P.G.
Engineering Geologist
Division of Water Quality
State Water Resources Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

SUBJECT: COMMENT LETTER—SWRCB TENTATIVE GENERAL WASTE DISCHARGE REQUIREMENTS AT COMPOST MANAGEMENT UNITS UNDER NO. DWQ-2012-XXXX

Dear Mr. Mitchell:

The Southern California Alliance of Publicly Owned Treatment Works, or SCAP as we are commonly called, is pleased to provide comments on the Tentative General Waste Discharge Requirements at Compost Management Units (CMUs) currently under consideration for adoption.

SCAP represents 85 public wastewater agencies that provide essential water and wastewater treatment to nearly nineteen million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. We provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as reclaimed water and renewable energy.

Several of SCAP's members manage their biosolids utilizing composting and are regulated by individual NPDES permits and WDRs in accordance with federal, state and local regulations. SCAP's comments are intended to address our members' concerns and request clarification regarding the applicability of the proposed General Order to CMUs with individual permits and WDRs.

Specifically, it is unclear whether the proposed General Order language exempts those CMUs composting biosolids that are operating under existing individual permits or WDRs. As you are aware, composting projects authorized by individual permits and WDRs undergo thorough site specific CEQA reviews and environmental and public health evaluations. In light of these rigorous evaluations and the actions needed to achieve compliance with them,

Fallbrook PUD
Goleta Sanitary District
Goleta West SD
Inland Empire Utilities Agency
Irvine Ranch WD
Laguna County San District
Lake Arrowhead CSD
Las Virgenes MWD
Leucadia WW District
Los Angeles County DPW
Los Angeles County Sanitation Districts
Metro Wastewater JPA
Metropolitan WD of Southern CA
Montecito Sanitary District
Moulton Niguel WD
Ojai Valley Sanitary District
Olivenhain MWD
Orange County Sanitation District
Orange County Water District
Otay Water District
Ramona Municipal WD
Rancho California WD
Rancho Santa Fe CSD
Rubidoux CSD
San Elijo JPA
Santa Margarita WD
South Coast Water District
South Orange County WWA
Vallecitos WD
Valley Center Municipal WD
Valley Sanitary District
Victor Valley WWRA
West Basin MWD
Western Municipal Water District
Whispering Palm CSD

SCAP contends that such facilities should not be subject to duplicative coverage under this proposed General Order and we respectfully request that the Order include language to address this important clarification.

We very much appreciate your consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "John Pastore". The signature is written in a cursive style with a large, looped initial "J" and a distinct "P".

John Pastore, Executive Director

cc: Enrique Zaldivar, President SCAP