



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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GAIL FARBER, CHAIR
MARGARET CLARK, VICE - CHAIR

June 15, 2015

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

Dear Ms. Townsend:

**PROPOSED GENERAL WASTE DISCHARGE REQUIREMENT FOR COMPOSTING
OPERATION DATED MAY 29, 2015**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board) Notice of Availability (NOA), Notice of Public Workshop, and Notice of Public Meeting, Compost Fact Sheet, Draft Environmental Impact Report and Proposed General Waste Discharge Requirements for Composting Operations (Draft Order), which was released for public review and comments on January 13, 2015. The Task Force provided comments for the State Water Board's consideration during the official commenting period (see enclosed letter dated February 19, 2015). Upon review of the revised documents dated May 29, 2015, we noticed that the revised Draft Order has failed to address the concerns expressed by the Task Force. We are concerned with the failure of the Draft Order to provide any response to comments raised by the Task Force. This is of major concern considering the U.S Clean Water Act standards and the very strict requirements that are imposed on jurisdictions in Los Angeles County by California Regional Water Quality Control Board, Los Angeles Region.

We appreciate your consideration of our attached comments as they relate to the Draft Order and look forward to working with you in developing an effective statewide order for composting facilities. Additionally, we would appreciate your acknowledgement, response, or objection to our concerns which would be of great interest to jurisdictions in Los Angeles County as well as those throughout the state. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or at (909) 592-1147.

Ms. Jeanine Townsend
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Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor, City of Rosemead

KV:

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Enclosures

cc: Mr. Matthew Rodriguez, Secretary, CalEPA
Ms. Felicia Marcus, Chair, SWRCB
State Water Resources Control Board (Thomas Howard, Lisa Babcock, Scott Couch,
Brianna Bergen)
Los Angeles Regional Water Quality Control Board (Charles Stringer)
Each Member of the Los Angeles County Integrated Waste Management Task Force