

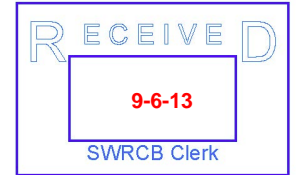
RESOURCE MANAGEMENT AGENCY

Planning Division

Kimberly L. Prillhart  
Director

# county of ventura

September 6, 2013



State Water Resources Control Board  
Attn: Jeanine Townsend, Clerk to the Board  
P.O. Box 100  
Sacramento, CA 95812-2000

E-mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Comments on the NOP for an EIR for the General Waste Discharge Requirements for Composting Operations

Dear Ms. Townsend:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,

Tricia Maier, Manager  
Planning Programs Section

Attachments

County RMA Reference Number 13-020





**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
PLANNING AND REGULATORY DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Tom Wolfington, Permit Manager – (805) 654-2061

**MEMORANDUM**

DATE: September 4, 2013

TO: Laura Hocking, RMA/Planning Technician

FROM: Tom Wolfington, P.E., Permit Manager *TW*

SUBJECT: RMA 13-020, General Waste Discharge Requirements for Composting Operations, SWRCB NOP EIR

Pursuant to your request, this office has reviewed the subject Notice of Preparation (NOP) of Environmental Impact Report (EIR) package.

**PROJECT DESCRIPTION**

To protect ground and surface water quality, the State Water Board proposes to adopt general waste discharge requirements that would provide coverage for composting operations in the State of California for use by the Regional Water Quality Control Boards (Regional Water Board). It would be at the discretion of each Regional Water Board whether to apply the General Waste Discharge Requirements for Composting Operations (Order) to facilities in their region. The Order would apply to all areas used for the receipt, processing, and storage for the conversion of certain eligible organic materials into a compost product. The Order will include conditions that would address appropriate water quality protection measures at existing and proposed composting operations that seek coverage under the Order. The construction of new composting operations and the expansion of existing composting operations would be regulated by local land use authorities; this Order would not permit the actual construction of any new facilities or the expansion of existing facilities.

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

It is noted that the draft requirements specify control measures for runoff from a 25-year peak storm event. The Ventura County Watershed Protection District typically considers impacts from a 100-year (1-percent chance) event for design and protection purposes. It is suggested that language be incorporated into the composting requirements to explain the State Water Board's position on control measures for the 100-year (1-percent chance) runoff event. It could be helpful to have a statement indicating whether this is beyond the intended scope of the regulations, or that consideration of such additional requirements is deferred to local land use authorities.

**END OF TEXT**