
From: patrickm@hydrosagritech.com
Sent: Wednesday, December 03, 2014 5:08 PM
To: Compost Transfer Regs
Cc: Chris Ott
Subject: CALRECYCLE'S PROPOSED REGULATION TEXT AMENDING TITLE 14 AND 27 OF THE CCR - COMPOSTABLE MATERIALS/TRANSFER PROCESSING REGULATIONS
Attachments: CalRecycle Letter.docx

Mr. Decio,

Attached is a comment on the proposed regulation that seeks to expand the exemption for POTWs to privately owned water treatment systems that meet certain conditions.

We look forward to a discussion on this issue.

Thank you for your consideration.

Sincerely,

Pat

Patrick McLafferty
Hydros Agritech, Inc.
(916) 225-6065 Mobile
www.hydrosagritech.com





December 3, 2014

Mr. Ken Decio
Senior Integrated Waste Management Specialist
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812-4025

Re: CALRECYCLE'S PROPOSED REGULATION TEXT AMENDING TITLE 14 AND 27 OF THE CCR -
COMPOSTABLE MATERIALS/TRANSFER PROCESSING REGULATIONS DATED SEPTEMBER 2014

Dear Mr. Decio:

Our firm designs water treatment and resource recovery systems of agriculture. The system produces Title 22 water for discharge reuse or recycling and is regulated under the Porter-Cologne Act, US Clean Water Act the regulations of the state and regional water quality control boards and their permitting processes. These laws address all elements of the treatment and discharge process and the systems are designed and operated to maintain strict quality controls of all treatment processes.

A component of the Hydros process and system is the use of anaerobic digestion of food and or animal waste. The system is distinguished from typical AD projects however because water treatment to Title 22 standards is a principal design parameter.

Section 17403.1. (a) (8) of the proposed regulation largely, if not completely, exempts publically owned water treatment facilities (POTWs). Hydros's systems appear to meet or exceed a higher tier of requirements, being under the requirements of the regional water quality control boards, than those proposed. Hydros suggests that privately owned water treatment systems that treat water from agricultural sources to Title 22 standards be exempted. Rigorous permitting, sampling, inspection, record keeping and reporting, are inherent in the NPDES process and offer necessary and appropriate levels of control and oversight to protect the public.

Hydros would like to engage in a conversation with the department to craft specific exemption language that ensures needed public protection.

Sincerely,

Patrick McLafferty
Principal