

## MEMORANDUM

**To:** Tom Howard  
Executive Director  
State Water Resources Control Board

**Date:** December 9, 2011

Caroll Mortensen  
Director



**From:** \_\_\_\_\_  
DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY (CalRecycle)

**Subject:** **PERMITTING OPERATIONS AT PUBLICLY OWNED TREATMENT WORKS (POTWS) THAT ACCEPT HAULED WASTE FAT AND OIL**

Thank you for the December 6, 2011 memo regarding the permitting of operations at POTWs that accept hauled waste fats, oils, and grease (FOG) and inject this waste into anaerobic digesters.

We agree with your staff's recommendation for the Regional Water Quality Control Boards to place a standard provision in NPDES permits that requires POTWs to develop and implement standard operating procedures for FOG acceptance and digestion operations. CalRecycle is in the process of revising the regulations, and will take into account this approach in our effort to further reduce regulatory overlap with cross media issues between our agencies.

Please feel free to contact me at (916) 322-4032 or [Caroll.Mortensen@calrecycle.ca.gov](mailto:Caroll.Mortensen@calrecycle.ca.gov) to further discuss this issue.