

From: [Rick Moore](#)
To: [Hartzell, Marty@Waterboards](mailto:Hartzell.Marty@Waterboards.ca.gov)
Subject: FW: Northern Recycling Compost Facility in Zamora
Date: Friday, May 01, 2015 1:50:21 PM

Hi Marty,

I just sent this to Amy; meant to copy you, too.

Thank you,

Rick Moore

From: Rick Moore
Sent: Friday, May 01, 2015 1:48 PM
To: 'Amy.Ha@Waterboards.ca.gov'
Cc: 'Greg Kelley'; Neil Edgar
Subject: Northern Recycling Compost Facility in Zamora

Amy Ha, PE

Water Resources Control Engineer
Title 27 Permitting and Mining Unit

Central Valley Regional Water Quality Control Board

11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Dear Ms. Ha,

Thank you for the opportunity to comment on the Tentative Waste Discharge Requirements for the Northern Recycling Compost Facility in Zamora.

When the ROWD was initially prepared for the facility, the Draft General WDRs for Compost Facilities had a requirement for working pad permeability of 10-6 cm/s. This value was presented in the ROWD to match up with the Draft WDRs under the assumption that a proposal less stringent than what was tentatively being required in the Draft General WDRs would not be acceptable. Since then the Draft General WDRs have evolved, and the version that appears to be poised for adoption requires only 10-5 cm/s. Therefore, it is requested that the requirement for Northern Recycling be revised to a working pad permeability of 10-5 cm/s.

Additionally, the Tentative Northern Recycling WDRs have a sunset date for food waste acceptance for the pilot project of 1 December 2015. Northern Recycling would like to continue this pilot project until 2020 (if allowed by the Yolo Solano Air Quality Management District) to optimize the treatment of food waste/green waste blends using positive aeration with a carbonaceous layer. The focus of the pilot project has recently changed from negative to positive aeration, along with an extension of the project.

Thank you for consideration of this input.

Sincerely,

Rick Moore



Rick Moore

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