Humboldt County
Department of
Health&Human
Services

Environmental Health
Melissa Martel, Director
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phone: (707) 445-6215 | fax: (707) 441-5699

July 3, 2013 (via email)

Hank Brenard Environmental Consultants, FPC
1508 Main St
Fortuna CA 95540

Subject: **Within-vessel Biosolids Compost Operation**
1680 Samoa Boulevard, Arcata CA APN 021-201-005, 007, 008
Potential Change in Operations – Mixed Biosolids Feedstock

Dear Mr. Brenard,

As per our recent phone conversation and site visit, the Department of Health and Human Services, Division of Environmental Health Local Enforcement Agency (LEA) understands that you are considering accepting biosolids mixed with green waste (mixed biosolids) from the Elk River Wastewater Treatment Plant operated by the City of Eureka. This material, if accepted, would be used as another feedstock for your in-vessel biosolids/green material compost operation as described in your October 23, 2012 and November 13, 2012 letters. You informed us then and the LEA agreed in a letter of January 4, 2013 that the proposed operation would not be subject to compostable material handling requirements of the California Code of Regulations (CCR) Title 14 § 17854 if it complies with the following four exclusions found in § 17855:

1. Composting and bulk composted material will total less than 50 cubic yards (CCR T14 17855a8)
2. Vermicomposting (CCR T14 17855a2)
3. Each bag of composted material will be no larger than 5 cubic yards (CCR T14 17855a7)
4. All feedstock (including biosolids) stored on site will be handled so as to preclude its reaching temperatures of 122 degrees Fahrenheit or above (CCR T14 17855a5J)

The receipt, storage and processing of mixed biosolids was not included in the description of your proposed operation and may not meet the fourth exclusion. Depending on the percentage of green material in the mixed biosolids, it could heat up as it dries out and exceed 122 degrees F.

Prior to receipt of this material, please provide the following information to the LEA in writing:

1. The number of vessels and the total composting capacity of each vessel.
2. The total volume on site of composting and bulk composted material.
3. The volume of biosolids in cubic yards now in storage at the facility.

4. The time needed to go from feedstock to finished bulk or bagged compost.
5. The leachate storage capacity since sewer connection has not been achieved.
6. The status of the proposed water and sewer connections.

Provide the following information on the mixed biosolids stored at the Elk River WWTP:

1. The percentage of green material in the mixture.
2. All temperature readings recorded by City of Eureka staff
3. The estimated water content of the mixed biosolids.
4. How the feedstock, if received, will be handled to preclude its reaching temperatures of 122 degrees Fahrenheit or above.

If the LEA determines that the new feedstock will meet exclusion #4 above, provide the following in an update to the description of your operation:

1. The overall amount of mixed biosolids you plan to take and the estimated delivery schedule (e.g., yards/week for how many weeks).
2. The hauler and the type of bin/vehicle that the material will be hauled in.
3. The total storage capacity that would be available for the mixed biosolids, which we understand must be stored separately from the pure biosolids.
4. The process needed to complete the composting. (E.g., will you need to send the compost to Wes Green for screening before placing it in the worm boxes?). Provide an overall description of the entire process.

Thank you for your cooperation on the process. We look forward to further communication with you on this issue. You may contact me at 707-268-2224 or hhill@co.humboldt.ca.us with any questions.

Sincerely,

Harriet Hill

Harriet Hill, REHS
Environmental Health Specialist II
LEA Program Manager

e: Bruce Gehrke, City of Eureka
David Spinosa, Land Use Program, DEH
John Loane, CalRecycle
Charles Reed, NCRWQCB
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