·PELLEGRINI GROUP·

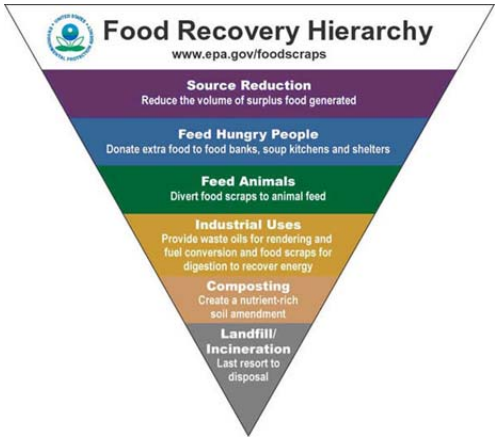
February 17, 2014

Ms. Caroll Mortensen
CalRecycle
1001 I Street
Sacramento, CA 95814

Dear Ms. Mortensen:

RE: Comments on the Proposed New Grant Program for GHG Reductions from Organics on implementing the Federal EPA Food Recovery Hierarchy

The Pellegrini Group is a family of independent hauling and processing companies located throughout the Bay Area which consists of Alameda County Industries, Garden City Sanitation, Livermore Sanitation, Mission Trail Waste Systems, and Peninsula Sanitary Service. The Pellegrini Group strongly supports the use of cap and trade revenues for GHG reductions from organic waste with a priority of implementing the Federal EPA Food Recovery Hierarchy. We recognize and appreciate your leadership with Scott Smithline on the AB 32 Scoping Plan Update and the most recent Budget Change Proposal for the $30 million grant GHG Emission Reductions through Recycling and Composting.



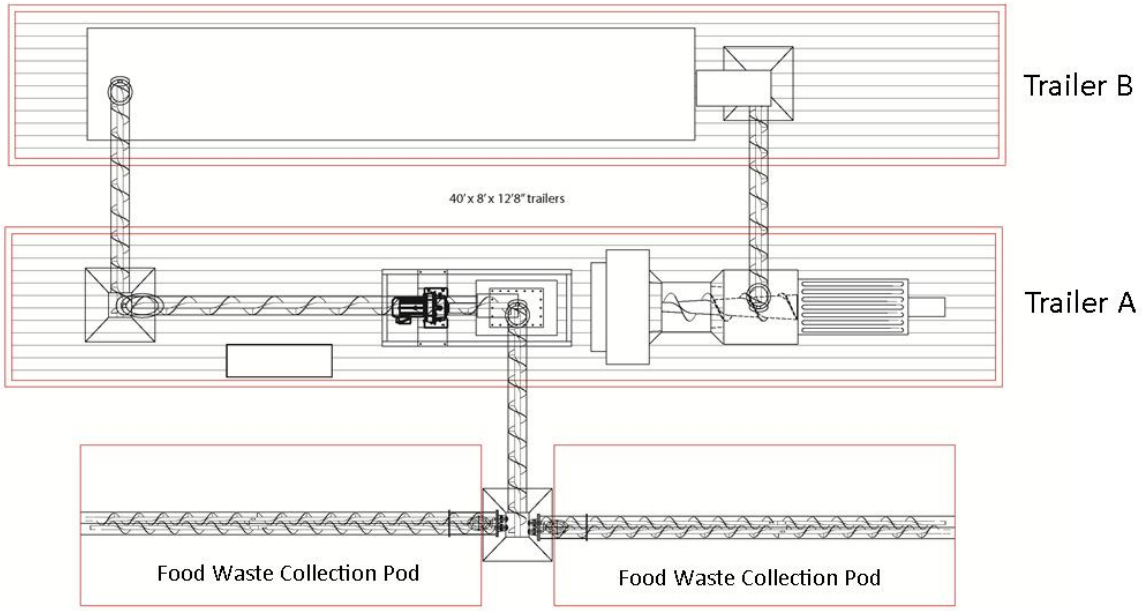
We understand that food waste dehydrators and liquefiers unless coupled with additional composting or digestion may not be eligible for funding as some of those project may not be able to demonstrate a safe and secure market. We also understand the concept that food waste prevention projects, when partnered, that rescues edible food from being waste normally destined to landfills and results in increased food distribution to people is an eligible project. The Pellegrini Group would like to extend that concept to include animal feed derived from post-consumer food waste.

The Federal EPA Food Recovery Hierarchy is noted where source reduction is followed by feeding hungry people and then feeding animals. Industrial uses such as anaerobic digestion and composting follows next with landfilling and incineration last. Post-consumer, or secondary, food waste processing equipment when coupled with dehydrators can provide safe and excellent animal feed. Post-consumer food waste occurs after source reduction and feeding hungry people, as post-consumer food waste is not a viable option for either of those two higher hierarchy options.

We understand the grant could be used for expansion of facilities to turn food waste into value-added products. The Pellegrini Group would locate the first pilot facility at our Mission Trail Waste Systems facility which we plan to replicate at our other facilities and throughout California.

The expansion of our facility includes the installation of secondary food processing equipment, which is a mobile, trailer-mounted system consisting of a slow-speed shredder and screw press. The post-consumer food waste is first conveyed, using an enclosed screw conveyer into the slow-speed shredder, where it is pulverized into a wet pulp. The pulp is then delivered via enclosed screw conveyor into a secondary trailer-mounted holding tank, along with all residual liquids from the process. The pulp material is conveyed to a screw press, located on the primary trailer with the shredder, where it is extruded to remove solid residue and excess water. The residual liquid and clean pulp material is conveyed into a separate, sealed container for delivery to an appropriate, permitted receiving facility – initially either a compost facility or an anaerobic digestion facility. We are working on a food dehydrator system to safely produce animal feed from this post-consumer food waste feedstock. The residual overs fraction of the food waste is expelled from the screw press into a covered container for delivery to a permitted composting facility or, if needed landfill.

The trailer-mounted food processing equipment is presented below:



Post-consumer Food waste processing equipment: Trailer-mounted processing equipment (Trailer A) and storage container (Trailer B). All food waste contents of system are transferred directly into food processing equipment and storage containers via covered conveyors.

The Pellegrini Group strongly believes that eligible projects should include post-consumer food waste processing equipment coupled with food waste dehydrators and additional programs to produce safe animal feed in concert with the Federal RPA Food Recovery Hierarchy.

We support the need to fund shovel-ready CEQA certified projects. We also support the maximum funding award amount of $3 million. There are plenty of smaller-scale CEQA ready projects that spread the investment around the state and can afford the best return on the investment to deploy the resources that build upon the infrastructure in place today.

Should you have any questions, please contact me at (650) 814-9532.

Sincerely yours;

Lou Pellegrini, Jr.
Pellegrini Group

Cc: Scott Smithline, CalRecycle Policy Director