

# Orange County Sanitation District

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July 14, 2015

Via Electronic Mail

CalRecycle  
[compost.transfer.regs@calrecycle.ca.gov](mailto:compost.transfer.regs@calrecycle.ca.gov)

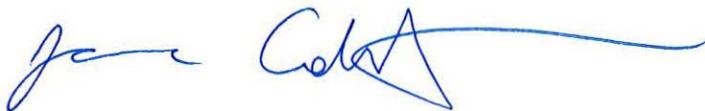
SUBJECT: Comments on Proposed Revisions to Title 14 and Title 27 of the  
California Code of Regulations

In response to the proposed revisions to Title 14 and Title 27 of the California Code of Regulations, the Orange County Sanitation District (OCSD) would like to take this opportunity to provide comments. OCSD is responsible for safely collecting, treating, recycling, and disposing of the wastewater generated by 2.5 million people living in central and northwest Orange County, California. OCSD has a 25-member governing board comprised of one County Supervisor, 20 City Council members, two Sanitary District and two Water District representatives within a 471 square mile service area.

The acceptance of hauled-in organic waste such as Fats, Oils, and Grease (FOG), food waste (source separated, etc.), vegetative food waste (cannery, food processing etc.), and others for anaerobic digestion at Publicly Owned Treatment Works (POTWs) is a steadily increasing practice, and it is an important management option for this valuable waste stream. Moving forward, this practice will be an integral component of POTWs serving as key partners in achieving at least five significant state objectives by 2020: (1) to provide 33% of the state's energy needs from renewable sources; (2) to recycle 75% of the solid waste generated in the state; (3) to achieve 1990 levels of carbon dioxide equivalent emissions; (4) to reduce the carbon intensity of transportation fuel by 10%; and, (5) to help meet the Governor's Healthy Soils Initiative program.

OCSD is able to further four of these five objectives directly by receiving food waste into our digesters. That is truly an amazing synergy to achieve State mandates and improve our environment. The revisions made by CalRecycle effectively address comments that were previously submitted by the California Association of Sanitation Agencies (CASA). We appreciate CalRecycle's responsiveness and the collaborative process used in the advancement of the proposed regulations. We now urge rapid adoption of the proposed regulations as currently drafted.

Thank you again and please do not hesitate to contact my staff, Tom Meregillano, with any questions or comments at [tmeregillano@ocsd.com](mailto:tmeregillano@ocsd.com) or at (714)593-7457.



James Colston  
Environmental Compliance Manager

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