

July 14, 2015

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

VIA ELECTRONIC MAIL

Ken Decio  
Waste Permitting, Compliance, and Mitigation Division  
CalRecycle  
P.O. Box 4025  
Sacramento, CA 95812

Dear Mr. Decio:

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

The East Bay Municipal Utility District (EBMUD) supports CalRecycle's proposed compostable materials and transfer/processing regulations. EBMUD has been a national leader in recycling trucked-in organics with anaerobic digestion at a publicly-owned treatment works (POTW). EBMUD has successfully received and anaerobically digested solid food wastes, grease trap wastes, and a variety of other anaerobically digestible organics for over 13 years. EBMUD started working closely with CalRecycle long before receiving any organic trucked-in wastes, to ensure a safe and environmentally protective anaerobic digestion operation. It has been a long and collaborative partnership.

EBMUD's organics digestion operation is a very clean and efficient way to recycle digestible organics locally to where these wastes are generated. Along with being a leader in anaerobically digesting trucked-in organic wastes, EBMUD has been a leader in the water and wastewater treatment industry for 91 years and 64 years, respectively—with regulatory compliance always being a primary objective. EBMUD applauds CalRecycle's collaborative approach in reviewing its current regulations, discussing options for revision, and then implementing positive changes that further promote waste recycling while protecting public and environmental health.

California is pursuing 75% diversion of materials from disposal. POTWs are in a unique position to provide local recycling of anaerobically digestible organics, a significant portion of waste still going to landfills and usually generated in close proximity to a POTW. POTWs have been regulated primarily by the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCB) for many years. EBMUD supports the proposed revisions, which prevent regulatory overlap for the receiving, handling, and anaerobically digesting presorted, preprocessed, and trucked-in solid organic waste at a POTW.

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We would like to express our sincere appreciation for the long and productive partnership EBMUD has had with CalRecycle over the many years we have worked on these issues together, and we look forward to our future collaborations.

Thank you very much,

A handwritten signature in black ink, appearing to read "Donald Gray", with a large, stylized flourish at the end.

DONALD GRAY  
East Bay Municipal Utility District

cc: Mark de Bie – CalRecycle  
Bob Holmes – CalRecycle  
Johnny Gonzales – State Water Resources Control Board  
Dr. Douglas Hepper  
Greg Kester – CASA