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Company: Waste Less Living, Inc.

Date: 7/14/15

RE: CalRecycle's Compostable Materials, Transfer/Processing Rulemaking.

This correspondence is in response to the request for public comment on CalRecycle's Compostable Materials, Transfer/Processing Rulemaking. We submitted initial comments on 5/5/15 and appreciate the 15 day extension.

Please do consider the following comments in your rulemaking efforts as it will have a direct impact on our innovative business model that strives to recover compostable products from the waste stream and close the loop on its disposal through composting and not landfilling. Other similar businesses are coming on-line to target uniquely manufactured compostable products like tableware and diapers and other film packaging. Please consider the following:

General. Please consider including and defining the term for "organic" and include in the definition reference to "compostable products with ASTM D6400 certification.

General. Please consider including reference language to compostable certification of products (i.e., ASTM D6400) as feedstock (Item 19).

General. "Food scraps," (food material as currently defined) along with other "organic (compostable) material", by the general populace and businesses including waste haulers are perceived to be a key component to "solid waste." "Food scraps" and "organic/compostable material" need to be clearly defined as a "resource" and input to the manufacturing of compost NOT a waste item in need of landfill disposal. Consider excluding "food material" and "organic/compostable material" from solid waste definition.

Item (19), (21), (26). We acknowledge and agree with the omission of the term "waste/solid waste" from the "feedstock (19)," "green material (21)," and "mixed material (26)" definitions. This should be consistent with "food material" Item (20) below.

Item (20) "Food Material" – As with the above definitions, consider removing the word "waste" from the definition for consistency and accurate messaging such that the material is valued more as a "resource" and not "waste" material.

Section 17854. Item (5) Please consider including an exclusion for activities that involve recovering source separated organics/compostable materials at the source of generation and prior to disposal into the solid waste stream for direct transport to a composting facility.

Section 17854. Omitted Item (8) Please consider reinstating the "within vessel composting process activities with less than 50 cubic yard capacity" as an exclusion. There has been much commercial success with this size system and they have proven worthy of its application at this scale. It can serve

our cities well into the future to remove such regulatory barriers as it would incentivize cities and businesses to develop local processing capabilities.

Section 1789.5 Initially, in-vessel digestion activities with less than 100 cy on-site capacity was included in the rulemaking increasing the capacity from 50 – 100cy. It is now omitted. What is the rationale for the omission of in-vessel systems altogether at this juncture when the environmental benefits of such systems are undisputable ? The removal of such an activity is a clear disincentive for this type of technology to be applied in the marketplace. Please consider adding back this exclusion as it would help diversify opportunities for organics processing at the local level.