



**WESTERN PLACER**  
WASTE MANAGEMENT AUTHORITY

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KEN GREHM, EXECUTIVE DIRECTOR

July 7, 2015

SENT VIA EMAIL

Mr. Ken Decio  
Waste Permitting, Compliance and Mitigation Division  
California Department of Resources Recycling and Recovery  
P.O. Box 4025  
Sacramento, CA 95812-4025

**SUBJECT: CHANGES TO PROPOSED COMPOSTABLE MATERIALS,  
TRANSFER/PROCESSING REGULATIONS**

Dear Mr. Decio:

The Western Placer Waste Management Authority (WPWMA) appreciates the opportunity to comment on the most recent changes to the above proposed regulation.

The WPWMA is a regional agency comprised of Placer County and the cities of Roseville, Rocklin and Lincoln providing recycling and waste disposal services to these communities as well as to the cities of Auburn and Colfax and the Town of Loomis. The WPWMA owns and operates a materials recovery facility, greenwaste composting operation, and the only active landfill in Placer County.

The WPWMA respectfully submits the following comment regarding Section 17863.4(f)(3) Odor Impact Minimization Plan and Nuisances:

On page 60 of the proposed regulation the word *public* was removed from the term *public nuisance*, potentially implying that the EA could issue a Notice and Order in the event of a *nuisance* rather than a *public nuisance*. The WPWMA assumes this revision was made for consistency with Section 17852 of the proposed regulation. Nuisance as defined in the proposed regulation has the same definition as a public nuisance as defined in Section 3480 of the CA Civil Code, i.e. "affects at the same time an entire community, neighborhood or any considerable number of persons". The WPWMA recommends that the regulation maintain use of the term *public nuisance* to avoid potential confusion and maintain consistency with the Civil Code.

Sincerely,

Eric Oddo, PE  
Environmental Engineering Program Manager

***RECYCLING AND DISPOSAL MADE EASY***

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