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July 14, 2015

## ELECTRONIC MAIL

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

Dear Mr. Decio:

### **LA SANITATION'S COMMENTS ON CALRECYCLE'S PROPOSED REGULATION AMENDING TITLES 14 & 17 OF THE CALIFORNIA CODE OF REGULATIONS - COMPOSTABLE MATERIALS/TRANSFER PROCESSING**

LA Sanitation (LASAN) appreciates the opportunity to provide comments on CalRecycle's Proposed Compostable Materials, Transfer/Processing Rulemaking dated June 29, 2015.

LASAN is responsible for managing municipal solid waste collected from more than 750,000 households. Residents are provided with three bins, including blue for recyclables (other than yard trimmings), green for yard trimmings, and black for non-recyclable materials. With many successful landfill diversion programs, including greenwaste processing, the City of Los Angeles (City) was certified by the University of California, Los Angeles to have achieved 76.4% landfill diversion rate.

LASAN has been both a collector and processor of green materials for over 50 years, and our comments are based on our operational and processing experience.

LASAN collects an average of 1,800 tons per day (tpd) of residential yard trimmings. The majority of the material (approximately 80%) is delivered to private contractors for processing and delivery to end users. Over 380 tpd of green materials is processed through two LASAN operated facilities: the Harbor Mulching Facility, which processes up to 80 tpd of green trimmings originating in the San Pedro/Harbor and West Los Angeles area; and the Lopez Canyon Environmental Center located in Lake View Terrace, which processes up to 300 tpd of green trimmings (100 tons per week of horse

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manure from the Valley collection districts and up to 150 tpd of bulky brush from commercial tree trimmers). All collected greenwaste is processed and reused as mulch and compost by farmers, nonprofit organizations and residents. It should be noted that **none of LASAN's collected and processed green material is used as an alternative daily cover at landfills.** LASAN also owns and operates the Griffith Park Composting Facility where dropped leaves, lawn clippings, and trimmings from acres of the Park are mixed with zoo manure and biosolids and composted. The final compost product is used in Griffith Park, thus completing the full cycle of recycling.

LASAN is committed to achieving zero waste with targets of 90% landfill diversion by 2025 and 95% by 2035. However, Section 17868.5 (a) of the proposed draft language will result to our curbside green waste program resorting to landfilling as it is technically infeasible to meet.

As we have indicated to CalRecycle staff, it is hard to meet the 1% contamination limit on the curbside green waste material as we do not control how materials are received. LASAN has several outreach programs such as an ambassador program and other educational programs educating residents on how to properly dispose their waste. However, as indicated previously by CalRecycle staff, it is hard to have an effective educational program that limits contamination to 1%. Furthermore, there are concerns about the methodology on how contamination is proposed to be measured by CalRecycle.

As we have indicated in our December 2014 letter, we recommend that this section be amended to:

**§ 17868.5. Green Material and Vegetative Food Material Processing Requirements.**

Green material, as defined in section 17852(a)(21), and vegetative food material, as defined in section 17852(a)(20)(A), must satisfy the following requirements:

(a) The feedstock shall undergo load checking to ensure that physical contaminants ***are no greater than 10% of total weight. However, if the load is found to include physical contaminants that exceed 10 percent by weight of the entire load, it then must be taken to a full solid waste permit facility for processing.*** Load checking shall include both visual observation of incoming waste loads and load sorting to quantify the percentage of physical contaminants and detect receipt of unacceptable feedstock (e.g. feedstock that does not meet the definition of green material or vegetative food material).

Furthermore, CalRecycle should focus on the back end of the process and LASAN does not have any issues meeting to proposed limits delineated in Section 17868.3.1 (Compost shall not contain more than 0.5% by dry weight of physical contaminants greater than 4 millimeters; no more than 20% by dry weight of this 0.5% shall be film plastic greater than 4 millimeters).

It is essential that we continue to operate our sustainable practice of collecting green waste from our residents and converting them into free mulch, TOPGRO™ Soil Amendment & TOPGRO™ Premium Soil Amendment products, which benefits our residents, other City departments, farmers, schools, non-profit organizations, and businesses.

We look forward to working with CalRecycle as we move towards achieving our zero waste goals as well as contributing to the state's AB 341 mandate.

KEN DECIO  
July 14, 2015  
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If you need additional information or would like to discuss further these comments, please do not hesitate to contact me at (213)-485-2210 or Alexander E. Helou, Assistant Director, at (213) 485-2210.

Sincerely,



ENRIQUE C. ZALDIVAR, Director  
LA Sanitation

AEH/ECZ:kg

- c: Greg Good, Mayor's Office
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