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Company: Waste Less Living, Inc.

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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. Thank you for the opportunity.

I am the founder and president of Waste Less Living, a local zero-waste consulting and composting service provider in the City of Pasadena. Please do consider the following comments in your rulemaking efforts as it will have a direct impact on our ability to continue to offer our services in the City of Pasadena. Please consider the following:

1. Remove any reference of "waste" to "food" ie. (20) "Food Material"

"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.

2. Include **small to medium in-vessel composting systems** as an **Excluded Activity** that can process between <1 cy to 20 cy of organic material a day , an amount that is significantly below the notification threshold of 5,000 cy. There are on-site in-vessel composting systems that are appropriate for restaurants, schools, universities, hotels and hospitals that could benefit from these smaller systems (Somat, BioGreen 360, Xact Systems BioReactor, HotRot).

3. Municipalities are **deferring** to the CA Public Resources Code (CA PRC) for their own definition of solid waste. The CA PRC under section 40191 (a) includes the terms "putrescible solids, paper, ashes, manure, vegetable and animal solid" which ARE compostable and organic material. It appears that CalRecycle does NOT list "solid waste" in its glossary of definitions either. Please consider including a definition for "solid waste" and to consider the following:

"Solid waste is defined as any pre-or post-consumer non-recyclable or non-compostable discarded material for landfill disposal and having no other resource value in the marketplace."

4. Neither the CA PRC (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=40001-41000&file=40100-40201>) or CalRecycle (<http://www.calrecycle.ca.gov/LGCentral/Glossary/>) define what "biodegradable," or "putrescible" is in their glossary listing. If the "solid waste" definition is to be redefined to exclude

organic material and other compostable material, then these terms need to be clearly and accurately defined and consistent across regulatory entities.

Please consider the inclusion of the following terms and suggested definitions:

“putrescible waste” – “includes any organic material that is NOT in the process of being properly composted resulting in rapid microbial decomposition causing nuisances such as that of odors, vectors, gases or other offensive conditions.

“biodegradable” – the biological breakdown of material into very small and distinguishable parts by microorganisms such as bacteria and fungi. Biodegradable is not the same as compostable.

Please consider further defining the following term:

“compostable material” – any organic material and/or bio-product meeting the ASTM D6400 standard for compostability and capable of biodegrading and ultimately disintegrating into carbon dioxide, water, inorganic compounds and biomass (aka soil) at a rate similar to paper and which contains no toxic residue. The original organic material being processed is indistinguishable after composting and is an input to making compost.

Please consider including the following term and definition:

“in-vessel systems” - “a process in which compostable material is enclosed in a drum, silo, bin, tunnel, reactor, or other container for the purpose of producing compost, maintained under uniform conditions of temperature and moisture where air-borne emissions are controlled” – Title 14 CCR, Division 7, Chapter 3.1, Section 17852

“organic” – any material of, relating to, or derived from living matter.