
From: Norma McDonald <Norma.McDonald@ows.be>
Sent: Wednesday, May 06, 2015 11:24 AM
To: Compost Transfer Regs
Subject: Comments on Proposed Regulations for Compostable Materials

Dear Mr. Decio,

This provides comment on the proposed regulations for compostable materials, specifically Title 14, Natural Resources-- Division 7, CIWMB, Chapter 3.1, Section 17852, the definition "(26) "Mixed Solid Waste" means any material that is part of the municipal solid waste stream, and is mixed with or contains non-organics, processed industrial materials, or plastics. A feedstock that is not separated or contains 1.0% or more physical contaminants by weight is mixed solid waste."

We strongly urge modification of the 1% limit on physical contaminants from this definition as it will effectively render all source separated household organics as mixed solid waste, as well as all other venues where the waste is collected with any consumer interaction. Even in localities with well-established source separated collection systems, a contamination rate of 2-3% is considered exceptionally clean and the best achievable anywhere in the world. We could find no other reference in the proposed regulations that would prevent source separated organics containing 1% or more physical contaminants from coming under this definition. The definition as currently expressed will also preclude composting of vast quantities of soiled, non-recyclable coated papers - the very item illustrated as compostable on consumer educational materials.

Based on our experience in over 35 countries over the last 27 years doing waste audits, running anaerobic digestion and composting facilities, we strongly urge this definition be modified to state "(26) "Mixed Solid Waste" means any material that is part of the municipal solid waste stream, and is mixed with or contains non-organics, processed industrial materials, or plastics. A feedstock that is not separated or contains 15.0% or more physical contaminants by weight is mixed solid waste."

Sincerely,

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