

Submitted by Email: [compost.transfer.regs@calrecycle.ca.gov](mailto:compost.transfer.regs@calrecycle.ca.gov)

May 6, 2015

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:

I am providing the following comment in response to the California Department of Resources Recycling and Recovery (Department) 15-day Comment Period regarding the “Notice of Changes to Proposed Compostable Materials, Transfer/Processing Regulations” that amend California Code of Regulations, Title 14, Division 7, Chapters 1, 3, 3.1 and 5 and create Chapter 3.2; and, to amend Title 27, Appendix 1.

I have spent over 35 year career in the food processing industry – retiring after 10 years as the Engineering Manager at Del Monte’s Modesto Food Processing Facility.

I have reviewed the changes the Department has made to the original proposal and appreciate that Stanislaus County’s Food Processing By-Product Use Program – which I was integrally involved in developing with Stanislaus County’s Environmental Health Department and the Central Valley Water Quality Control Board – will be recognized and excluded from the land application requirements for compostable materials and compost. It makes sense in times of limited resources to not impose redundant regulations on activities already regulated by your sister agency.

I would make one comment to your proposed definition of “Agricultural By-Product Material.” While the majority of this type of material is generated or separated at food processing facilities, it is possible that the some post harvest generation or separation can occur in the field. Other than being generated or separated in the field, the material is exactly the same as the material generated at a food processing facility. I believe the definition should be amended to include material generated or separated in the field.

Please don’t hesitate to contact me if I can provide any additional information regarding the food processing industry or the handling of food processing by-product.

Sincerely,

Jim Mortensen