

STANISLAUS COUNTY FOOD PROCESSING BY-PRODUCTS RE-USE COMMITTEE

Submitted by Email: 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:

We are providing the following comments 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. We are submitting the comments as the Stanislaus County Food Processing By-Products Re-Use Committee whose membership represents food processors, food by-product re-use sites, and haulers of food by-products.

The Department has responded to our primary comments with amendments to the original proposal to include a definition of "Agricultural By-Product" Material at § 17852. (a)(4.5) and excluded land applications of the same at § 17852. (a)(24.5)(B)(4) if the application is regulated by an order of the State Water Quality Resources Control Board or Regional Water Quality Resources Control Boards.

The amendments recognize that Stanislaus County's Food Processing By-Product Use Program has and will continue to adequately regulate land application of food processing by-product without unnecessary and duplicative regulatory oversight due to the Department's rules rightly directed at land application of compostable materials or compost.

If the Stanislaus County Food Processing By-Products Re-Use Committee can provide any additional information about our program to the Department please do not hesitate to get in contact.

Sincerely,

Martin Reyes, Chair
Stanislaus County Food Processing By-Products Re-Use Committee

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