



Del Monte Foods, Inc.
Cultivating Good Food for a Better Life

May 4, 2015

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

SUBJECT: Proposed Compostable Materials, Transfer/Processing Regulations

Dear Mr. Decio:

Del Monte Foods, Inc. (Del Monte) has reviewed the proposed changes to the Compostable Materials, Transfer/ Processing Regulations issued for public comment on April 21, 2015, and appreciates many of the changes that CalRecycle have made to the second draft of the proposed rule. We also appreciate CalRecycle's efforts in working closely with the food processing industry in crafting the second draft of the rule.

Del Monte requests that CalRecycle closely consider all of the permit comments offered by the California League of Food Processors in their letter dated May 4, 2015. Further, Del Monte requests that CalRecycle expand Chapter 3.1, Article 2, Section 17855, Item (a) (5) to list the following activities as excluded activities for compostable materials handling permitting if:

(K) the activity is part of a food processing facility and is used to temporarily store, process, and/or transfer agricultural by-product materials not used in the production of compost; or

(L) the activity is part of an authorized State Water Resources Control Board, Regional Water Quality Control Board, and/or County permitted agricultural by-products materials land spreading operation or program.

We think it is terribly important that the above exclusion activity language be listed in the new rule for clarity. Note that under no circumstances are we advocating that food processors should be allowed to store, process, and/or transfer compostable materials in a manner creating nuisance conditions.

Please keep in mind that strict federal and state food safety rules generally do not allow food processors to poorly manage compostable materials that may quickly spoil creating nuisance conditions (flies, rodents, odors, etc.).

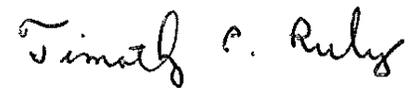
Be aware that it is standard practice in the food processing industry to move/ transfer agricultural by-products from plant to management site as quickly as possible to avoid the creation of nuisance conditions and any food safety issues.

The recycling of food processing by-products on land is a long-established, scientifically proven sound process that is good for the environment. The Stanislaus County's Food Process Residue Use Program is a good example of government and industry working together to sustain agriculture and the food processing industry and protect the environment. Del Monte looks forward to working with CalRecycle to continue to promote the sound reuse and recycling of all types of organic materials generated in the state.

We appreciate your consideration of our comments. If you have any questions, please do not hesitate to contact me at tim.ruby@delmonte.com or at (925) 949-0432.

Sincerely,

DEL MONTE FOODS, INC.

Handwritten signature of Timothy P. Ruby in black ink.

Timothy P. Ruby
Environmental Water Manager

cc: Rob Neenan, California League of Food Processors
Jenifer Carlson, Manufacturers of the Central Valley