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**From:** White, Chuck <cwhite1@wm.com>  
**Sent:** Thursday, May 14, 2015 11:51 AM  
**To:** Compost Transfer Regs; Decio, Ken@CalRecycle  
**Cc:** Dan Noble; Veronica Pardo  
**Subject:** RE: WM Comments on Compostable Material Regulation 15-day Comment Period

Ken Decio and CalRecycle Compost Regulatory Unit –

Waste Management sent in a cover letter last week supporting the comments of the California Refuse & Recycling Council (CRRC) and the Association of Compost Producers (ACP). WM is a member of both organizations. Unfortunately, upon further review, WM must take exception to full support of the letters that the ACP sent to CalRecycle about the proposed changes to compost regulations.

The ACP letter proposes that Chipping & Grinding facilities be held to the same material testing protocols and standards (i.e., heavy metals, etc.) as full Compost facilities. We do not believe this is appropriate. We simply do not believe that green waste chipping and grinding operations should be held to the same standards. For example, while WM's chipping and grinding operations are typically able to meet 0.1 percent contamination by product weight requirement imposed by Ventura County, WM has certainly not suggested that these standards are appropriate for composting operations. Because of the nature of composting processes, achieving this standard for compost materials is simply not appropriate. Similarly, applying compost test procedures for metals and other parameters for composting are simply not appropriate.

Testing per the parameters required by full Compost facilities takes several days, if not weeks to complete. A Chip & Grind facility must be able to move material offsite quickly to prevent it from entering an anaerobic condition – frequently within 24 hours of the operations. At some of WM green waste C&G facilities, we are **required** to move material within 24 hours of receipt. As such, the ACP's proposed testing standards would be impossible to achieve. We hope that ACP's position on this matter is simply due to a misunderstanding of chipping and grinding operations and regulatory requirements which are different than composting. We hope that efforts to impose identical standards are not and attempt to benefit composters through imposing impossible disadvantages on chip and grind operations.,

We incorporated ACP's comments by reference in our letter to CalRecycle. I wish to make clear that while we generally support ACP's comments on composting operations we strongly disagree with ACP's position on Chip and Grind operations. CalRecycle must make sure that Chip & Grind facilities can continue to operate and not be burdened by inappropriate standards that are difficult, if not impossible, to meet. Alternative testing requirement for Chip & Grind facilities should be part of the final regulations.

WM trusts it is not too late to make this distinction. Please let me know if you have any questions or require further information.

Sincerely --

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**From:** White, Chuck  
**Sent:** Wednesday, May 06, 2015 3:53 PM  
**To:** compost.transfer.regs@calrecycle.ca.gov  
**Cc:** Dan Noble; Veronica Pardo  
**Subject:** WM Comments on Compostable Material Regulation 15-day Comment Period

Please accept the attached comments for WM on the proposed regulations.

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