

San Luis Obispo County Integrated Waste Management Authority

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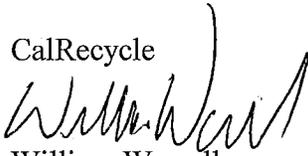
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May 6, 2015

To: CalRecycle

From: William Worrell

Subject: Proposed Compost Regulations

The San Luis Obispo County Integrated Waste Management Authority (IWMA) would like to comment on the proposed definitions of Facilities in Section 17896.2 (16), Section 17896.2 (19) and Section 17896.2 (15).

The proposed definitions include an average daily limit. Having an average daily limit and maximum weekly limit could cause confusion. For example, a medium volume facility that operates 7 days per week could receive more than 100 tons on a single day, as long as the average daily is less than 100 tons and the maximum weekly tonnage is under 700 tons. So instead of having an average daily tonnage and a maximum weekly tonnage, keep the maximum weekly tonnage and limit the daily intake to the daily receiving and storage design capacity.

The proposed definitions could also lead to confusion in that they contain an average daily minimum and maximum tonnage. For example:

1. If you have a large volume facility and during the winter it receives less than an average of 100 tons per day and 700 tons per week, according to the definition it is no longer a large volume facility.
2. You could have a situation where you are permitting a new facility that will initially receive less than 15 tons per day and 105 tons per week. However over the next 5 years you know you will be receiving more than that quantity, so you want to be permitted as a medium volume facility, yet you don't meet the proposed definition of a medium volume facility.

The IWMA respectfully requests that the proposed definitions in Section 17896.2 (16), Section 17896.2 (19) and Section 17896.2 (15) be changed to the following to address the above issues. These changes provide clarification and do not change the intent of the proposed regulations.

(16) "Limited Volume In-vessel Digestion Operation" means an operation that receives less than 105 tons (or 420 cubicyards) per week of solid waste for digestion in an in-vessel digester. Additionally, the operation shall not exceed the solid waste daily receiving and storage capacity limitations of the general design of the facility (whichever is less).

(19) "Medium Volume In-vessel Digestion Facility" means a facility that receives less than 700 tons (or 2,800 cubic yards) per week of solid waste for digestion in an in-vessel digester. Additionally, the facility shall not exceed the solid waste daily receiving and storage capacity limitations of the general design of the facility(whichever is less).

(15) "Large Volume In-vessel Digestion Facility" means a facility that receives solid waste for digestion in an in-vessel digester. The facility shall not exceed the solid waste daily receiving and storage capacity limitations of the general design of the facility.