



**sonoma county**  
DEPARTMENT OF HEALTH SERVICES  
PUBLIC HEALTH DIVISION

Rita Scardaci, PHN, MPH – Director  
Ellen Bauer, PhD, MPP – Division Director

December 5, 2014

Mr. Ken Decio  
Senior Integrated Waste Management Specialist  
Department of Resources and Recovery  
1001 I Street  
P.O. Box 4025  
Sacramento, CA 95812-4025

RE: CalRecycle Proposed Regulation Text for California Code of Regulations Title 14

Dear Mr. Decio,

In September 2014, the Proposed Regulation Text became available for review and comment. The Local Enforcement Agency for Sonoma County would like to submit the following comments for review and consideration:

1) 17868.5 (a) Green Material and Vegetative Food Material Processing Requirements

Comment: The regulation to meet the 1% contaminant requirement should allow a short time frame for sorting in addition to load checking. Curbside green cans often have greater than 1% contamination that present difficulty for the operators in meeting the requirement. In addition, 1% contamination on inbound feedstock is difficult to assess. We support the new regulations that propose limits to the percentage of contamination in the end product to 0.1% thereby achieving a clean, viable compost product.

2) The Sonoma County LEA is supportive of a phased approach to meeting the 0.1% contaminant limits in compost products proposed by the California Compost Coalition.

3) 17852 (a) (15) (D) Definitions: "Disposal of compostable material"

Comment: Biosolids require additional feed stocks and handling to meet the definition of active compost. As defined in the regulations, permits would not be required for biosolids field spreading activities. Biosolids are often stored at locations other than POTWs in accordance with land use regulation. The regulations are not clear concerning storage of biosolids at a non-Publicly Owned Treatment Plant site. We suggest that 17855 Excluded Activities (a) (5) (B) be revised to add language "...or other sites as approved by land use planning."

4) 17852. Definitions (a)(20)(A) "Vegetative Food Material"

Comment: This definition states: "...no salts, preservatives, fats, or oils or adulterants shall be added." Additional testing methodology is needed for the EA to assess levels of salts, preservatives, fats in incoming vegetative food material feedstock.

Thank you for your assistance. Please contact me at (707) 565-6534, [jennifer.lyle@sonoma-county.org](mailto:jennifer.lyle@sonoma-county.org) or Leslye Choate at (707) 565- 6546, [Leslye.choate@sonoma-county.org](mailto:Leslye.choate@sonoma-county.org) if you should have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Lyle".

Jennifer Lyle  
Environmental Health Specialist III  
Local Enforcement Agency

C: Christine Sosko, Director of Environmental Health  
Leslye Choate, Interim Environmental Health Program Manager