



December 5, 2014

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

Via E-mail: compost.transfer.regs@calrecycle.ca.gov

Subject: Comments on the Proposed Revisions to Existing Title 14 and Title 27 Regulations Regarding Compostable Materials, Transfer/Processing

Dear Mr. Decio,

This letter is in response to the request for comments on the proposed revisions to the existing Title 14 and Title 27 regulations regarding compostable materials and transfer/processing. Recology would like to thank you and your staff for taking on the important task of revising the State's composting regulations to address the evolving markets, technologies, and policies surrounding the waste reduction and recycling industry.

First, Recology is in support of the comprehensive approach to compost odor standards and complaints CalRecycle staff has developed.

Second, Recology is concerned over the proposed contamination limit for finished compost. The proposed revisions would impose a 0.1% contamination limit on all finished compost products. Recology finds this standard to be unrealistic and unachievable. While we do agree with establishing a contamination limit for finished product, we propose a more reasonable contamination limit of 0.5%, which is a limit that is already widely used and accepted. CalRecycle, at its September 25, 2014 workshop, agreed that many other countries implement a contamination limit of 0.5%. Recology contends that a 0.1% contamination limit on finished compost would be near impossible to meet and would impose too great a cost on the producer. It is likely this will have the unintended effect of decreasing compost production state-wide, which would, in turn, negatively impact California's goal under Assembly Bill 341 of achieving 75% recycling by 2020.

Finally, the existing regulations propose a 1.0% contamination limit for green material. Recology recommends that both green material and food material to be used as compost feedstock be held to a 3.0% contamination limit.

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Thank you for the opportunity to comment. We look forward to continuing to work with CalRecycle on these regulatory revisions. If you have any questions, please do not hesitate to contact me at 415-875-1245 or emerrill@recology.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Merrill". The signature is written in a cursive, flowing style.

Erin Merrill
Environmental Planning Manager
Environment and Planning