

**CSS**

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

**Re: Proposed Regulations for Compostable Materials, Transfer/Processing**

Dear Mr. Decio:

California Safe Soils (CSS) is pleased to submit its comments to CalRecycle's proposed Compostable Materials, Transfer Processing regulations. As you may be aware CSS provides a unique full-cycle fresh food processing system that we believe will be instrumental in our state's efforts to attain the recycling goal of 75% waste diversion from landfills as well as California's efforts to attain its greenhouse gas (GHG) reduction goals.

The CSS process utilizes an aerobic, enzymatic digestion technology that is uniquely different from existing organic composting techniques and alternative digestive processes. Through this process CSS is able to harness the full capabilities and benefits of the unsold food and drastically reduce the potential risks of harboring pathogens while maintaining significant benefits to soil organisms.

CSS has the following comments to the proposed regulations:

1. CalRecycle is to be commended for its efforts to further refine its regulations as they pertain to new and emerging technologies for in-vessel digestion of organics.
2. CSS appreciates the attempts to clarify the regulatory jurisdictional authority over food material processing that is required to be handled pursuant to California Food and Agricultural Code regulations.
3. In order to clarify regulatory jurisdictional authority, CSS recommends the addition of the definition of "Renderer" to section 17896.2 that corresponds to Food and Agricultural Code section 19213 as follows:

**19213. "Rendering" means all recycling, processing, and conversion**

**of animal and fish materials and carcasses and inedible kitchen grease into fats, oils, proteins, and other products that are used in the animal, poultry, and pet food industries and other industries.**

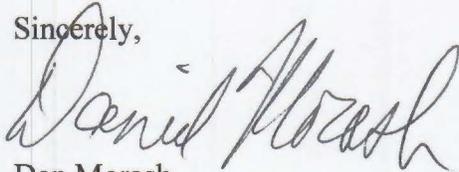
4. And then in Section 17896.6, CSS recommends a Renderer exclusion to this Excluded Activities section as follows:

**All in-vessel fresh food digestion processes that are permitted and regulated under the California Department of Food and Agriculture Code qualify as an excluded activity under this section.**

We believe this language will clarify any ongoing regulatory jurisdictional uncertainties pertaining to permitting in-vessel fresh food digestion processes.

Thank you for your consideration of our comments and CSS looks forward to continuing to work with CalRecycle in achieving its organics recycling goals.

Sincerely,



Dan Morash

cc. Susan Markie, Robert Holmes  
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