
From: Shikari Nakagawa-Ota <sota@ph.lacounty.gov>
Sent: Friday, December 05, 2014 4:02 PM
To: Compost Transfer Regs
Cc: Shikari Nakagawa-Ota; Gerardo Villalobos; Pete Oda
Subject: CALRECYCLE'S PROPOSED COMPOSTABLE MATERIALS/TRANSFER PROCESSING REGULATIONS DATED SEPTEMBER 2014

Dear Mr. Decio:

The Solid Waste Management Program, acting as a Local Enforcement Agency (LEA), appreciates the opportunity to comment on CalRecycle's regulatory revisions to Title 14 and 27 of the California Code of Regulations, dated September 2014.

The LEA reviewed the proposed regulations and would like to offer the following comments:

1. Page 8 Line 29 - Section 17852(a)(13.5)

In order to ensure operator's compliance with this specific requirement, please include a sentence to read "verification of compliance with this section must be provided to the EA upon request".

2. Page 8 Line 29 – Section 17852(a)(13.5)

Please explain why the digestate may only be handled at a facility that has obtained a Compostable Materials Handling Facility Permit and why the digestate cannot be handled at a Compostable Handling Operation sites such as Green Material Composting Operation or Biosolids Composting Operations at POTW.

3. Page 9 Line 49 - Section 17852(a)(21)

We recommend paper products be removed as a feedstock. It will be very difficult for the LEA to quantify and determine the 1% contamination by weight. Please define the term "paper products" if it will be handled as a feedstock.

4. Page 10 Line 4 – Section 17852(a)(24.5)(A)

It states the compostable material does not contain more than 0.1 % by weight of physical contaminants greater than 4 millimeters. Please explain how it can be quantified and if training and appropriate tools will be available for the LEA. Please clarify if the weight is based on wet or dry physical contaminants.

5. Page 10 Line 24 and 24 -

Do CalRecycle and CDFA have a protocol/procedure or MOU regarding the arrangement on the agronomically beneficial land application? If this material is agronomically beneficial, will a jurisdictional area that brings in the material get diversion credit?

6. Page 10 Line 55 - Section 17852(a)(27.5)(B)

Please define the term "entire community".

7. Page 11 Line 30-34 - Section 17852(a)(38.5)

We recommend paper products be removed as a feedstock.

8. Page 27 Line 57 - Section 17896.2(9)

We recommend the same tonnage limits applied to the Distribution Center In-Vessel Digestion Operation as used for In-Vessel Digestion Operations and Facilities.

9. Page 28 Line 1 - Section 17896.2(9)

For consistency, "putrescible material" mentioned in this section should be changed to "putrescible waste".

10. We recommend Enforcement Agency Notification Form (CIWMB 169) be revised as well.

The LEA appreciates your consideration of our comments and look forward to working with you. Should you have any questions, please contact me at (626) 430-5540.

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