



A Tradition of Stewardship  
A Commitment to Service

Planning, Building & Environmental Services

1195 Third Street, Suite 210  
Napa, CA 94559  
www.countyofnapa.org

David Morrison  
Director

December 5, 2014

Ken Decio  
Department of Resources Recycling and Recovery  
1001 I Street  
P.O. Box 4025  
Sacramento, CA 95812-4025

RE: Draft Regulatory Revision to Title 14 and 27.

Dear Mr. Decio,

Napa County has reviewed the draft regulations and we thank you for the work of preparing the proposed changes to benefit all stakeholders.

**Section 17868.3.1 – Physical Contamination Limits.**

It will be very difficult for the EA to verify contamination limits that are 0.1% by weight. This places the EA in a position that analytical is the only way, with no onsite discretion, to determine “contamination” prior to compost being sold or removed. Physical contamination and should be related to environmental, health, and safety (EHS). Currently, the load check process and identification of incoming feedstocks is when the EHS process of verifying no hazardous materials etc. are including in the incoming material. In my opinion, the material on the back end, in which the proposed physical contamination of 0.1% would be verified, is more focused on compost quality. True compost quality should managed by industry. In past meetings, it appeared that most contamination issues were related to land application. If land application is one of the main areas in which contamination is a problem, have the low (0.1-1.0%) contamination limits placed in the Land Application section of the regulations.

Recommendation:

- Verification of physical contamination limits at point where compost is sold or removed from site no lower than 1.0% by 2017 with agreed upon analytical test methods. Give the EA more discretion when to apply the analytical testing (EHS vs. compost quality)
- Verification of physical contamination limits at point of land application at 0.5% by 2017 with agreed upon analytical test methods.

**Section 17852 (38.5) – Definition of Vegetative Food Material Composting Facility.**

To make this facility effective in operations, permitting, and enforcement, I think the feedstocks should be limited to vegetative food material and paper products for Registration Permits. The feedstocks should not include manure. The Registration Permit could be problematic if manure (and its possible

runoff and odor issues) were allowed with startup of operations with limited “approval”, CEQA or Conditional Use Permit, and up to 12,500 cu yds on site. The manure feedstock would be more appropriate for the Full Permit over 12,500 cu yds.

Recommendation: Remove manure from the list of feedstock within the Vegetative Food Material Compostable Facilities – Registration. (Leave in for Full Permit)

Thank you for the opportunity to comment.

*Greg Pirie*

Greg Pirie, REHS  
Solid Waste Local Enforcement Agency  
Environmental Health Division  
Napa County Planning, Building, and Environmental Services