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Sent: Friday, December 05, 2014 2:24 PM
To: Holmes, Robert@CalRecycle; Decio, Ken@CalRecycle
Cc: Greg Schirle (gschirle@smcgov.org); Pirie Greg (greg.pirie@countyofnapa.org)
Subject: comments for the compost reg package.

Dear CalRecycle,

I would like to take this opportunity to express a few points of concern for your consideration regarding the compostable materials regulation package as follows:

1. As I have stated during the last regulation package over a decade ago, some of the metals contamination levels allowed are still too high, especially the lead and copper. And why is molybdenum still removed? I realize these are still modeled after old standards for sewage sludge established at the federal level, but they are woefully higher than what should be allowed into our backyards, crop lands and water ways. The new Water Board standards pending for composting facilities will hopefully supersede the compost requirements when they are adopted, because as soon as compost at these levels enters the waters of the state, they would be considered a water contamination source and a stormwater violation.
2. I like the improved and clarified definition of disposal, in order to prevent any further massive stockpiles from occurring, such as the Grimsley case in Hollister.
3. I further take issue with the method to limit the amount of manmade contaminants in compost product, which I agree is a necessary thing in concept. However, the approach is for practical purposes very hard to implement and needs better explanations. Many things do not make a lot of sense and lack clarity. There should be a specific testing standard outlined, that answers things like minimum sample size, methodology used to analyze, and 0.1% relative to what? the entire sample, or that which doesn't pass the 4mm screen. Will the sample be dried first before weight determinations? If the sorting and search for contaminants under a microscope requires a water rinse, will the contaminants pulled out be dried again? As discussed, can there be the creation of a set of standardized vials? Even this will be a problem, because many contaminants are coated with silt and dust and do not become visible until rinsed in water.
4. On this same subject of contaminant levels, you may be missing the mark of the true concern. Just because a contaminant is less than 4 mm sieved, it will not be counted. However, the smaller the particle, the more readily it will be taken up into the life cycles of the biosphere. This size issue could easily lead to the operators grinding their products to below 4 mm and off it goes. So what really is the goal? It seems that this standard as described is more intended to prevent merely a visual impact or litter control. It is awful to see a field peppered with flakes of plastic after compost is applied. But is it so bad to see a few glints of glass? No! There is no physical safety hazard from <1/4" small chunks of silica sand, one of the basic elements of the earth anyhow. Agreed, it is manmade, but what is its true harm to the environment? Plastic is much worse. Iron and metal objects are usually not harmful either, since they oxidize into their elements and are taken up by plants and soil ecosystems. I believe many so-called manmade things should not be lumped in with paper, plastics and toxic remnants if they truly do not harm the environment. Such things as tiny pieces of silica glass, small metal items like nuts and bolts, that will rust away, etc, what is the harm when applied to increase production of a field of hay, cotton, or applied to a freeway median? These things as an inevitable part of compost, would be used against the industry you've worked so hard to promote

5. Finally, I see a big problem with the tier sizes for the things like wood chipping and grinding. The notification tier for chip & grind should be <20 tons notification, 20 to 100 tons registration, and 100+ full permit. Not <200 TPD as a notification.

That's what I would like to have you consider.

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