



December 5, 2014

Mr. Ken Decio
Senior Integrated Waste Management Specialist
Department of Resources Recycling and Recovery
1001 I Street
PO Box 4025
Sacramento, CA 95812-4025
Fax: (916) 319-7244
Email: compost.transfer.regs@calrecycle.ca.gov

Dear Mr. Decio:

Re: CalRecycle Draft Regulatory Revisions to Title 14 and 27 Regarding Compostable Materials Handling and Transfer/Processing

Dear Ken:

We appreciate the opportunity to comment on CalRecycle's proposed Title 14 and 27 revisions regarding Compostable Materials Handling and Transfer/Processing Regulations. We commend and support CalRecycle in its efforts to update the existing regulations regarding compostable materials and transfer/processing facilities in order to address the changing nature of organic waste handling throughout California, as well as safely enable the needed growth in diversion of this waste stream to meet the 75% Initiative, Strategic Directive 6.1, and other sustainability goals of the state.

For over 30 years, Marin Sanitary Service has collected green waste from our residential customers. In 2010, we started co-collecting green waste with food scraps from our residential customers and have added the collection of food waste only from our commercial customers. We take pride in collecting and delivering virtually contaminant free feedstock to our composter and anaerobic digester. With that said, we firmly believe that proposed contamination limits are too impractical given current and foreseeable compost market conditions and available technologies; and we anticipate that the consequences will be deleterious.

These limits will not help promote the recycling of organic material and will result in higher costs for both the collection and processing of the materials. These limitations may also result in increased landfilling of organics, not less. This will impair the directives to remove/divert approximately 10 million tons of organics from landfills over the next decade. The composting

1050 Andersen Drive, San Rafael, CA 94901
San Rafael, CA 94912 ■ (415) 456-2601 ■ Fax (415) 456-7595
www.marinsanitary.com





marketing will have a hard time competing against cheaper, synthetic chemical fertilizers. We do not feel this is the direction CalRecycle wants to move in.

The addition of food waste and other compostables such as food soiled paper and compostable plastics, will significantly impact the demands on organics processing and composting companies. Organic material that is virtually contaminant free is achievable but will take years of concerted outreach, education, and will require significant technology improvements and processing efficiency to eliminate all of the contamination. This will result in higher collection and processing costs which will increase the rates paid by customers.

While we would prefer that CalRecycle continue to allow market forces to dictate the level of physical contaminants, we are supportive of a phased-in standard that allows time for jurisdictions and operators to adjust to the potential cost increases projected in your economic analysis. The proposed 0.1% limit on physical contaminants may be achievable for green material but it is unrealistic for co-collected green waste and food waste.

Marin Sanitary Service has a long-standing commitment to composting and organics recycling. Since food is a primary contributor to greenhouse gas emissions, we are working in earnest to ensure it does not end up in a landfill. The environmental benefits of compost are well-known and wide ranging with respect to soil health, water quality and quantity, and greenhouse gas reductions. We look forward to the adoption of sensible regulations that will allow our company to continue providing these beneficial services to our jurisdictions. We support the structure that is proposed by the California Compost Coalition whereby in 2020 clean green facilities will meet the .1% and mixed materials .5% contaminant limits.

Thank you for allowing us to give comment on these critical regulations.

Sincerely,

Handwritten signature of Patty Garbarino in black ink.

Patty Garbarino
President
Marin Sanitary Services
Marin Recycling & Resource Recovery

Handwritten signature of Kimberly Scheibly in black ink.

Kimberly Scheibly
Municipal Contracts & Communications Manager

