
From: Gordon Shackelford <jgshackelford@cox.net>
Sent: Friday, December 05, 2014 3:53 PM
To: Compost Transfer Regs
Cc: gshackelford@mail.sdsu.edu
Subject: Response to CA Code of Reg. Amendments: Compostable Materials

Dec. 5, 2014

Gordon L. Shackelford
9716 Red Pony Lane
El Cajon, CA. 92021

Re: Amendments to CA Code of Regulation: Compostable Materials:
Title 14 Div. 7 Chap. 3.1 Art. 1
Title 14 Div. 7 Chap. 3 Art. 6
Title 27 Div. 2 Chap.4 Art. 2

To whom it may concern:

I am a past Chairman of the Lakeside Community Planning Group, an elected group that advises the County of San Diego on land use matters. I served of the LCPG for 20 years. I also have experience with air flow and plume modeling. First, as the College of Sciences (SDSU) Project Manager for a proposed Biomass (green waste) Cogeneration Project on campus and the drafter of the air quality section of the city of "San Diego's Quality of Life Board's Review of the SANDER Trash to Energy Project." This study was done by a team from UCSD and SDSU.

Along State Route 67, there are several green waste chipping and one composting facility. The odor problems are large, pervasive and persistent. This problem has existed for years having done great harm to our community. Enforcement to control odor has been ineffective. The problem seems to be that either sufficient regulations do not exist to solve the problems or the concentration of green waste facilities in this area make it impossible to determine which one or ones is causing the odors.

Within the very short time since I became aware specific changes in the Articles listed above, I have not found underlined/strikeout versions of the articles on your web site. I don't have the time, before the comment deadline, to set existing and proposed article copies side by side to find your revisions. So, will only be able to make these two recommendations:

1. Send someone to smell the odor problems due to green waste recycling and composting along SR 67 not of Lakeside, CA. 92040. Then review your regulations to see what is needed to resolve this type of odor problem.
2. Composting facilities that are regarded as small are, as I understand it, are subject to a ministerial approval process, meaning they, for most practical purposes, they must be approved. This needs to be changed to consider locations in valleys, nearby homes, etc. I would suggest to visit to the site of a proposed 400 cyclic yard per day composting facility at the EverGreen Nursery of Flynn Springs Road in El Cajon (part of the Lakeside planning Area).

Gordon Shackelford, Physics Lecturer Emeritus