
From: Sloan, Lisa [mailto:Lisa.Sloan@sbcphd.org]
Sent: Friday, December 05, 2014 3:19 PM
To: Decio, Ken@CalRecycle
Cc: Ohiosumua, Dianne@CalRecycle
Subject: Compostable Materials Draft Regulations

Hi Ken,

Please find below my comments on the proposed "Revision of existing Title 14 and Title 27 regulations regarding compostable materials, transfer/processing, permit application form, and permit exemptions."

1. The title of the code should indicate the current name of the CalRecycle agency: "California Code of Regulations Title 14. Natural Resources Division 7. California Integrated Waste Management Board **Chapter 1. General Provisions**"
2. The definition of Agricultural Material should be expanded to include manure derived from the boarding and training of animals that may not be used as a food source. Otherwise, such manure would not be eligible to be composted except at the level of a full compostable materials handling facility permit, even though the handling of horse manure, for example, may not impose the level of environmental nuisance as other materials needed to be processed under a full compostable materials handling facility permit. Suggested language follows:
(5) "Agricultural Material" means waste material of plant or animal origin, which results directly from the conduct of agriculture, animal husbandry, horticulture, aquaculture, ~~silviculture~~, vermiculture, viticulture and similar activities undertaken for the production of food or fiber for human or animal consumption or use ~~production and processing of farm, ranch, agricultural, horticultural, aquacultural, silvicultural, floricultural, vermicultural, or viticultural products~~, which is separated at the point of generation, and which contains no other solid waste. With the exception of grape pomace, agricultural material has not been processed except at its point of generation and has not been processed in a way that alters its essential character as a waste resulting from the production of food or fiber for human or animal consumption or use. Material that is defined in this section 17852 as "food material" or "vegetative food material" is not agricultural material. Agricultural material includes, ~~including~~ but is not limited to, horse and other animal manures, orchard and vineyard prunings, grape pomace, and crop residues.

Please consider this message as a formal comment letter, unless these issues have already been addressed elsewhere.

Regards,

Lisa

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