



WASTE CONNECTIONS, INC.
Connect with the Future®

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

Dear Mr. Decio:

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

Dear Ken:

Waste Connections Inc. (WCI) thanks you for the opportunity to comment on CalRecycle's proposed Title 14 and 27 revisions regarding Compostable Materials Handling and Transfer/Processing Regulations. In addition we have appreciated the effort CalRecycle has undertaken to share the information with the industry through informal workshops and meetings conducted to date.

We have reviewed the Consolidated Draft Regulation Text, released originally on October 30, 2013, that has been provided for this Proposed Rulemaking, in addition to the corresponding Initial Statement of Reasons and Standardized Regulatory Impact Assessment (ISOR). We are generally supportive of the draft language. However, we have significant concerns about certain key issues and are hopeful that our comments will result in revisions to the proposed text prior to the conclusion of this formal rulemaking process.

1. A proposed 0.1% contamination level (glass, plastic, metal) by weight for compost product.

By comparison Washington State, per WAC 173-350-220, Physical contaminant shall not exceed 1% by weight total and not to exceed .25% film plastic by weight. WCI would like to ask for the rational and justification for the .1% contamination limit. We believe the 1% contamination level is achievable and ultimately markets drive the acceptable physical contaminants in finished compost. Our biggest concern as more feedstocks are forced into the compost stream i.e. "biodegradable service ware" and foodwaste a larger percentage of contamination will ensue. If feedstocks are controlled contamination will be controlled.

2. 17863.41 Odor Best Management Practice Feasibility Report (a)

WCI would ask that the words consecutive and chronic be defined. The Olympic Clean Air Agency requires complaints to be formal; signed by the complainant not anonymous, must be five form several individuals and within a designated time period of 12 months. In addition the violation can not be attributed to a start up/ shut down or to a malfunction of an operating system at the facility. Section (1) how will odor severity be determined? Some individuals may find Christmas trees malodorous while others find it pleasant.

3. 17852 (a)(24.5)(A)(4)Compostable Material shall not exceed an average of 12 inches

WCI believes compostable material should be applied at agronomic rates supported by field data not the 12 inches in total, accumulated depth sited in the draft rule.

WCI looks forward to speaking to you about these comments if you should have any questions. We wish to partner with you as we look forward to a future which allows for continued industry growth, provides a level playing field with competitive operations, and set standards that are reachable, yet still provides reasonable protection of the public health, safety, and the environment.

Sincerely

Jody L Snyder

Jody L Snyder
Director of Regulatory and Governmental Services