

From: dmiles@b2etech.com [mailto:dmiles@b2etech.com]

Sent: Monday, June 17, 2013 5:18 PM

To: Climate Change CalRecycle

Cc: David Miles

Subject: Input re AD & Composting Draft

Teri,

We (Back2Earth Technologies) are investigating the conversion of food waste to bio-plastic resin, specifically PolyHydroxyAlkanoate (PHA). Our bench testing will lead to commercial scale (100 tons per day) processing using AD.

Suggestion: (Short Term, Page 9) Because permitting steps are intricate and irregular, we suggest

CA form a single permitting unit to capture all related issues. This is not a new idea, but please

let us add our name to the chorus.

In addition, we will be retrofitting / upgrading existing AD facilities. Suggestion: create a related permit track to upgrade permits on existing AD facilities.

Question: There are other commercial grade products we intend to make from food waste using AD. They include several long-chain acids as well as a road salt material.

Because the draft document describes methane production from food waste, what are agency officials to use as permit guidelines?

There needs to be a regulatory provision to evaluate proposals for using AD in pursuit of products other than methane production.

I will attend your session in Sacramento on June 18 and will introduce myself to you.

Best Regards,

David Miles

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