



GAIL FARBER, CHAIR
MARGARET CLARK, VICE-CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

February 23, 2012

Mr. Ken Dicio
Senior Integrated Waste Management Specialist
Department of Resources Recycling and Recovery
1001 I Street
PO Box 4025
Sacramento, CA 95812-4025

Dear Mr. Dicio:

**CALRECYCLE'S INFORMAL WORKSHOP ON DRAFT REGULATORY REVISIONS
TO TITLE 14 AND 27 REGARDING COMPOSTABLE MATERIALS AND
PROCESSING FACILITIES-PROPOSED DEFINITIONS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on CalRecycle's Title 14 and 27 Regulatory Issues regarding composting activities and its Informal Workshop conducted on February 9, 2012 (enclosed). The Task Force commends and supports CalRecycle in its efforts to streamline the existing regulations regarding compostable materials and transfer/processing facilities. Regarding issues Nos. 1 and 2 discussed during the workshop (enclosed), the Task Force has reviewed the subject Regulatory Issues and would like to offer the following definitions:

Food Material definition, "Food Material" means material of plant or animal origin that contains of essential body of nutrients that are consumable by animal and human (excluding drugs and medicine), is separated from solid waste stream , and that does not meet the definition of "agricultural material."

Food Waste definition, "Food Waste" means food material (raw or cooked) that is discarded or lost uneaten or intended or required to be discarded. The food waste may come from residences and commercial establishments such as grocery stores, restaurants, produce stands, institutional cafeterias and kitchens.

Contaminant definition, "Contaminant" means any impairment of the quality of the air, waters of the state and composting pile which creates a hazard to the public health through poisoning or through the spread of disease.

Mulch definition, "Mulch" means any organic matter such as leaves, straw, or peat being used for the purpose of protective ground cover to prevent evaporation of moisture, freezing of roots, and the growth of weeds.

Beneficial Use definition, "Beneficial Use" means using solid waste not already defined as recyclable material by CalRecycle to make a product or as an effective substitute for materials use in a commercial product and specific utilization of a solid by-product as a source, that constitutes reuse rather than disposal, does not adversely affect human health or the environment, and is approved by CalRecycle.

Pursuant to the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended) and Chapter 3.67 of the Los Angeles County Code, the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

We appreciate you considering our comments and look forward to working with you in developing an effective statewide order for composting facilities. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste management Task Force and
Council Member, City of Rosemead

WT:

P:\epub\ENGPLAN\TASK FORCE\Letters\Calrecycle Title 14 and 27 Comments 02-21-2012.doc

Enc. (1)

cc: CalRecycle (Caroll Mortensen, Director; Mark Leary; Howard Levenson; Brenda Smyth)
State Water Resources Control Board (Charles Hoppin, Chair; Thomas Howard;

Mr. Ken Dicio
February 23, 2012
Page 3

Lisa Babcock; Roger Mitchell)
California State Association of Counties
League of California Cities
League of California Cities, Los Angeles County Division
Southern California Association of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each Member of the Los Angeles County Integrated Waste Management Task Force
and Facility & Plan Review Subcommittee