

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

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September 20, 2016

Ms. Margaret Clark, Vice-Chair  
Los Angeles County  
Solid Waste Management Committee/  
Integrated Waste Management Task Force  
Alhambra, CA 91803-1331

**SUBJECT: Land Application of Compostable Materials**

Dear Ms. Clark:

We are responding to your August 15, 2016 letter regarding the land application requirements for compostable materials. We have consulted with State Water Resources Control Board (SWRCB) staff, and the following responses are provided to you on behalf of CalRecycle and SWRCB staff.

In response to your comment regarding time and temperature requirements of Title 14, California Code of Regulations (14 CCR), composting facilities will continue to be required to meet the time and temperature requirements. The regulations do not require a demonstration that material has been subject to time and temperature requirements if it has been processed at a chip and grind facility or is unprocessed. However, all material applied to land will need to be below the maximum metal and pathogen levels found in 14 CCR section 17852(a)(24.5)(A)(2) and (3).

Regarding potential impacts associated with GHG emissions, odors, and water quality, prior to the new regulations, there were no limits imposed by CalRecycle on the amount of material that could be applied to land. The regulations establish measures for quality, thickness, and application frequency to be used to determine when material is being disposed. The regulations do not limit the authority of the Regional Water Quality Control Boards to address potential water quality issues. Local requirements can be more stringent than the regulations.

Relative to enforcement of Section 17868.3.1 requirements, CalRecycle staff is developing a sampling and analysis methodology to determine the percentage of physical contaminants in compostable material. The methodology will be provided to Local Enforcement Agencies to utilize when evaluating compliance with the requirements.



If you have any further questions or comments, please contact Martin Perez at 916.323.0834 or at [Martin.Perez@calrecycle.ca.gov](mailto:Martin.Perez@calrecycle.ca.gov).

Sincerely,



Mark de Bie, Deputy Director  
Waste Permitting, Compliance, and Mitigation Division

cc: Scott Smithline, CalRecycle  
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