



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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CalRecycle

[compost.transfer.regs@calrecycle.ca.gov](mailto:compost.transfer.regs@calrecycle.ca.gov)

Via Electronic Mail

Subject: Comments on Proposed Revisions to Title 14 and Title 27 of the California Code of Regulations

To Whom It May Concern:

The California Association of Sanitation Agencies (CASA) is supportive of the revised proposed regulations for in-vessel digestion and composting. CASA is a statewide association of municipalities, special districts, and joint powers agencies that represent more than ninety percent (90%) of the sewered population of California. CASA has long been a proactive leader on wastewater treatment, recycled water, air quality, biosolids management, renewable energy, and climate change mitigation issues. CASA has appreciated working with CalRecycle these past years to resolve this regulatory jurisdiction issue and generally concurs with the recommended approach and revisions made since the release of the October 10, 2014 draft regulations. The acceptance of hauled-in organic waste such as Fats, Oils, and Grease (FOG), food waste (source separated, etc.), vegetative food waste (cannery, food processing etc.), and others for anaerobic digestion at Publicly Owned Treatment Works (POTWs) is a steadily increasing practice, and an important management option for this valuable waste stream. Moving forward, this practice will be an integral component of, and POTWs a key partner in, achieving at least five significant state objectives by 2020: (1) to provide 33% of the state's energy needs from renewable sources; (2) to recycle 75% of the solid waste generated in the state; (3) to achieve 1990 levels of carbon dioxide equivalent emissions; (4) to reduce the carbon intensity of transportation fuel by 10%; and, (5) the Governor's Healthy Soils initiative.

We believe that the revisions made by CalRecycle effectively address comments we have previously submitted (12/5/14 and 5/6/15). We appreciate the agencies' responsiveness and the collaborative process used in the advancement of the proposed regulations. We now urge rapid adoption of the proposed regulations as currently drafted.

Thank you again and please don't hesitate to contact me with any questions or comments at [gkester@casaweb.org](mailto:gkester@casaweb.org) or at 916-844-5262.

Sincerely,

Greg Kester

Director of Renewable Resource Programs