

---

**From:** Decio, Ken@CalRecycle  
**Sent:** Tuesday, May 05, 2015 3:17 PM  
**To:** Compost Transfer Regs  
**Subject:** FW: Compostable Materials Draft Regulations

---

**From:** Sloan, Lisa [mailto:Lisa.Sloan@sbcphd.org]  
**Sent:** Tuesday, May 05, 2015 3:11 PM  
**To:** Decio, Ken@CalRecycle  
**Cc:** Ohiosumua, Dianne@CalRecycle; Solum, Dana; Brummond, David  
**Subject:** Compostable Materials Draft Regulations

Hi Ken,

Regarding: Compostable Materials, Transfer/Processing Rulemaking released for 15-day written comments on April 21, 2015.

Please find below my written comments:

1. Contaminant sampling requirements in 17862.1 for a chipping and grinding operation or facility should be left to the discretion of the LEA.
2. Contaminant sampling requirements in 17868.3.1 for a compostable material handling operation or facility should be left to the discretion of the LEA.
3. In-Vessel Digestion Operations and Facilities, page 47. 17896.58 Sampling requirements. This section may be difficult to observe given restricted storage space issues, depending upon the facility. Besides, if the material is destined for disposal, why is sampling of the digestate required.
4. In the case of product destined for disposal, testing prescribed in § 17896.60. Pathogen Reduction may not be indicated.
5. This testing requirement in 17896.61. Physical Contamination Limits may not be necessary, especially for digestate intended as ADC or disposal.
6. Page 64 Application instructions numbering of Part 1. A, B, C.1 through 6 do not coordinate with numbering in the application form itself, which includes Part 1. A, B, C.1 through 5.
7. Pages 7, 10, Section 17852. The definition of agricultural material includes manure, yet green waste does not. However, green material activities are more restricted than agricultural material in terms of the tiers. Ag materials can be notification tier with unlimited storage on site, but green material composting is limited to 12,500 cy. Is there a public health and safety or permitting reason behind the fact that green materials does not include animal manure in the definition?

Please consider this message as a formal comment letter

Sincerely,

Lisa

*Lisa Sloan*  
*Senior Environmental Health Specialist*  
*Santa Barbara County Environmental Health Services*  
*225 Camino Del Remedio, Santa Barbara, CA 93110*  
[Lisa.Sloan@sbcphd.org](mailto:Lisa.Sloan@sbcphd.org)  
*(805) 681-4942*