

June 5, 2013

California Air Resources Board
California Climate Action Registry
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The Climate Registry

Thank you for the opportunity to comment on this first revision to the Organic Waste Composting Protocol (OWCP).

Page 4 of the proposed Version 1.1 of the OWCP, defines a waste stream as waste material from a specific facility (if commercial waste) or from a specific jurisdiction (if residential waste). On Page 24, there is reference to non-SSO (mixed) organics-rich MSW from a single MRF.

The references to a "specific facility" or "a single MRF" are too restrictive and don't necessarily reflect how solid waste may be managed. It is certainly possible for food waste rich material from targeted collection routes to be delivered directly to a compost facility without going to a MRF. In fact, in the case of an unprocessed waste stream, there is no need for it to go to a MRF; if it does go to a MRF it is simply for the purpose of transferring the food-rich material from collection to transfer trucks for hauling. The nature of the waste and the avoided landfill emissions are the same whether the material is hauled directly to a compost facility, transferred to transfer trucks at a MRF or at a simple transfer station.

Regarding the proposed methodology for on-site waste characterization of organic-rich non-SSO MSW requires that 4 samples of 200 pounds each be hand sorted for every sampling event. The requirement to sort 800 lbs. of mixed MSW per sorting event is very onerous. That amount of material is very burdensome to sort through. Sorting four 100 lbs. samples from a load of waste is sufficient.

Again, thank you for the opportunity to provide comments.

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