



**ASSOCIATION OF  
COMPOST  
PRODUCERS**  
"We Build Healthy Soil"



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Robert Cave  
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RE : Comments on REGULATION 13 CLIMATE POLLUTANTS RULE 2 ORGANIC  
MATERIAL HANDLING AND COMPOSTING OPERATIONS (Rule 13-2)

Dear Robert Cave,

Association of Compost Producers ACP is a non-profit trade association founded in 1995, and now has over 100 public agency and private company compost producer members in California. The ACP members, who manufacture and sell compost throughout California, explicitly state in our mission that we are "dedicated to increasing the quality, value and amount of compost being produced and used in California. We do this by promoting activities and regulations that build healthy soil, benefiting people and the environment."

ACP members have a long and deep history in managing VOC and NOx emissions arising from their compost facilities and operations. In fact, we lead a project on this subject in the Central Valley funded by the San Joaquin Valley Air Pollution Control District ([www.valleyair.org](http://www.valleyair.org)) through their Technology Advancement Program (TAP). The project information is at:

[http://www.valleyair.org/grant\\_programs/TAP/documents/C-15636-ACP/C-15636\\_ACP\\_FinalReport.pdf](http://www.valleyair.org/grant_programs/TAP/documents/C-15636-ACP/C-15636_ACP_FinalReport.pdf)

As shown in this link and on this report, ACP was the project contract organization, and Dan Noble, ACP ED, was the Project Manager, partnering with an experienced compost producer, Kevin Barnes, Solid Waste Director, City of Bakersfield, who conceived of the plan and initiated the project by recruiting the team and then being the operations manager for the duration of the project. We would expect to see the same or greater scientific and practical rigor being applied to this Rule making.

**Association of Compost Producers**

*"We Build Healthy Soil"*

To *avoid having to put all the compost facilities within buildings*, that project clearly demonstrated the efficacy of using aerated static piles (ASP) to effectively reduce VOC emissions from compost production (by 98% in our demonstration project, compared to turned windrows).

This approach, has been used for decades in the compost industry to control odors, and demonstrated to be applicable in California to control *both* VOC reduction directly *and* NOx reduction (by reducing onsite diesel emissions from excessive turning and loader use), as well as reducing the amount of water needed to keep piles moist. Since it was implemented at the City of Bakersfield facility, this approach has additionally been used by the City of Los Angeles, the County of Orange, a major Synagro facility near Taft, a San Diego County facility and more than three facilities in the Bay Area, and others within and outside of California.

Given our members' demonstrated experience in two California Air Districts (South Coast and Valley Air) demonstrating the efficacy of this approach, we feel that it is contraindicated for Bay Area AQMD to invent a new approach that will be *much more costly* and *likely less effective* than the methods that are being adopted throughout our State, in air sheds that have more severe air issues than the Bay Area will ever have.

Additionally, we agree point for point with the items outline in greater detail in the California Compost Coalition (CCC) comment letter on Rule 13-2. It is estimated that the cost of compost production, under this proposed draft new Rule 12, would be economically prohibitive to the organics recycling industry, and will increase the cost of organics recycling considerably. There are other proven technologies that could be used to control odors and VOC's from the material tipping areas, (especially if food scraps are included with the landscape material), rather than a building in composting operations that should be considered. Increased efficiency and practicality would control VOCs, all while lowering NOx from decreased diesel equipment use.

All that said, *ACP staff and experienced members stand ready to collaborate with BAAQMD staff* to achieve a practical balance between costs and controls, for the sake of the Bay Area public and our shared air quality. As a resident of North Bay, within the BAAQMD jurisdiction, I hope that the new rules don't result in simply sending the valuable organic resources over into the Central Valley Air District. We need quality compost to benefit our home watersheds on our local landscapes and farms. Not only would we lose this valuable product to neighboring watersheds, the extensive additional trucking that will result from your proposed rule will create new, increased, diesel emissions both in our District and our neighboring valley communities.

Thank you again for the opportunity to work with your Compost Rule team to optimize the benefits to all our land, ecosystems, watersheds *and* the air we breathe. Please enlist our industry knowledge in making this a Compost Rule we all can live with, socially, environmentally *and* financially.

Sincerely,



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