Summary of meetings between Greg Kester (CASA) and both the State Water Board and CalRecycle on the implementation of SB 1383 on March 9 – 10, 2022. For the meeting with CalRecycle the following issues were discussed:

- **RDRS reporting under SB 1383** - There are no new reporting requirements to the RDRS system. The only exception would be if a third party composter sends overs or any other material to a landfill (which I don’t believe any do). If that does occur, then the composter would need to determine the organic fraction of what is sent to the landfill and report it. Composters may see two additional fields in the reporting (it wasn’t completely clear). They would be 1. % of organics sent to landfills which would be entered as zero. And 2. Why is it zero – answer is that nothing was sent to a landfill.

- **Methods to appeal for additional technology and management options which could qualify as a reduction in landfill disposal**. CalRecycle has added application information on their website and ARB has a calculator to determine the reduction in GHG emissions due to the process. If you are considering submitting an application, please contact Victoria Ngo at Victoria.ngo@calrecycle.ca.gov and she can assist you. Both links are here:
  
  CalRecycle’s SB 1383 Article 2 page: [https://www.calrecycle.ca.gov/organics/slcp/recyclingfacilities/article2](https://www.calrecycle.ca.gov/organics/slcp/recyclingfacilities/article2)
  
  CARB’s SLCP Article 2 page: [https://ww2.arb.ca.gov/slcp-organic-waste-reduction](https://ww2.arb.ca.gov/slcp-organic-waste-reduction)

- **Compost permitting issues amid CAA restrictions** – CalRecycle is well aware of the issue of the need for offset credits for new facilities and the shortage of their availability and increasing cost (10 fold increase last year). They have been in discussion with CAPCOA, CARB, and the individual local air districts. They do not have any resolution yet but is anxious to work with us on this. I noted the UC Davis work done by Dr. Green speciating VOC emissions from compost and we agreed that perhaps a revision to the State Implementation Plan would be worth pursuing. This is largely a federal compliance issue so USEPA must approve it. We will continue to work on this.

- **Communication with local jurisdictions on biosolids ordinance restrictions** – CalRecycle has developed FAQs on this Article 9 provision and has sent it to every jurisdiction ([Frequently Asked Questions about Implementing SB 1383 (ca.gov)](https://www2.calrecycle.ca.gov/Docs/Web/119889)). They will be prioritizing counties on which to conduct a compliance assessment soon and will take input from us if there are counties with particular importance (Stanislaus, San Joaquin, Sutter). They are taking an educational approach similar to what I have proposed rather than the hammer approach. We will continue to work with them on this.

- **Protocols for seeking procurement credit for eligible products** – First they noted that targets are set for each City based on its population. Targets for Counties are the County population minus each City population so it applies to mainly unincorporated parts of the county. [https://www2.calrecycle.ca.gov/Docs/Web/119889](https://www2.calrecycle.ca.gov/Docs/Web/119889) In order for us to get additional products deemed eligible for procurement, it can be done as a regulatory fix
or a legislative one. I will work on both avenues and they understand this has proven difficult for many jurisdictions so additional products would be beneficial.

My meeting with the State Water Boards was not as productive. I was seeking direction on the recommended changes we submitted for the land application general order (attached). While revision is in the queue, it is very low on a long list of priorities. They estimate it will not occur for several years at least. Please let me know how problematic the GO is for you and we can determine whether there is a way to elevate its priority.

Please contact Greg Kester at gkester@casaweb.org if you have any questions or comments.