



NORTHERN CALIFORNIA RECYCLING ASSOCIATION

April 21, 2017

Karen Stern
Communications Manager
Waste Management
Northern California – Nevada Market Area
172 98th Avenue
Oakland, CA 94603

Re: Altamont Landfill Compostable Materials Handling Facility – Support

Dear Ms. Stern,

I am writing to express the support of the Northern California Recycling Association (NCRA) for the Altamont Landfill Compostable Materials Handling Facility (CMHF). The proposed Covered Aerated Static Pile (CASP) processing facility would be the first large-scale composting facility to operate in Alameda County. Establishing in-County composting capacity has been a goal of NCRA for decades. Currently, the materials that will be composted at the Altamont CMHF are trucked to Marin or San Joaquin counties for composting. The reduced transport miles and local source of nutrient rich compost will greatly reduce the current carbon footprint of Alameda County's organics.

The Altamont CMHF will also play an important role in reaching the goals of Alameda County's Mandatory Recycling Ordinance as well as state laws AB 32, AB 341, AB 1826 and SB 1383. According to CalRecycle, California needs 30 to 100 new organics facilities in order to reach its diversion goals. The Altamont Landfill CMHF will help to ensure that Northern California has sufficient processing capacity for the additional organics that will be recovered over the next decade to meet state and local goals.

NCRA is an association of recycling businesses, community groups, municipalities, and individuals committed to promoting, expanding, and institutionalizing recycling. Founded in 1978, NCRA is a nonprofit trade organization for recyclers with over 200 members. The overall purpose of our organization is to promote waste reduction, reuse, recycling, salvaging, and composting as vital tools for resource and energy conservation and as cost-effective, environmentally-sound methods of disposing of discarded materials. We support the creation of local recycling/composting jobs and markets, and the principle of managing discards as close to the point of generation as possible. Therefore we support the development of local composting facilities such as the Altamont CMHF.

NCRA believes the Altamont Landfill is an appropriate location for a composting facility. NCRA has previously supported the use of active and closed landfills for composting. However, because we are dedicated to maximum waste reduction, reuse, recycling, salvaging, and composting before allowing discarded materials to be landfilled or incinerated, we strongly encourage Waste Management to pursue compost feedstocks and operating practices at the Altamont CMHF that will result in high-quality compost sold for off-site use. We encourage Waste Management to avoid, to the extent possible, sending any materials accepted by the Altamont CMHF to landfill or biomass incineration plants, and to minimize the on-site "beneficial use" of organics at the

Altamont Landfill. In addition, Waste Management absolutely must avoid large-scale landfilling of organics separated for composting, such as recently occurred at Republic Services' West Contra Costa Sanitary Landfill Organic Materials Processing Facility in Richmond.

NCRA supports finding the "highest and best" use for discarded materials. The long-term success of the Altamont CMHF is dependent on its ability to produce a quality, marketable compost. We strongly encourage Waste Management to produce high quality (e.g. OMRI Listed and/or US Compost Council Seal of Testing Assurance certified) compost products at the Altamont CMHF, as you have at the Redwood Composting Facility.

The long-term viability of the Altamont CMHF is also contingent upon its ability to be a "good neighbor" and minimize odors and other potential negative impacts to the public and the environment. As you are aware, there have been other large-scale composting facilities in Northern California (e.g. Guadalupe Mines, Sonoma Compost) that have been shut down due to concerns from neighbors and regulators. Such incidents hurt the reputation of composting facilities in general, lead to increased regulation of an already highly regulated industry, and make it difficult to maintain existing composting facilities and permit new ones. In order to promote composting at Altamont and beyond, we strongly encourage Waste Management to follow industry best management practices, and to work in a collaborative, transparent way with regulators and neighboring jurisdictions, businesses and residents to mitigate any potential impacts or concerns.

NCRA has a representative on the four-member Altamont Community Monitoring Committee. We recommend that Waste Management utilize this existing, independent committee to monitor composting operations at the Altamont CMHF. This will help to maintain public confidence in the composting operation, which is crucial to its long-term survival.

In closing, NCRA commends Waste Management on making this necessary investment in local composting capacity. We offer the expertise of our members as a resource to help the Altamont CMHF be successful and to support our mutual goals.

Sincerely,

Laura McKaughan

Laura McKaughan
President
Northern California Recycling Association (NCRA)

Cc: Altamont Community Monitoring Committee
Alameda County Department of Environmental Health
Bay Area Air Quality Management District
San Francisco Bay Regional Water Quality Control Board
Stopwaste
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