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Empowering Zero Waste

3 August 2025

**From: Kim Eger, Senior Vice President
FoodService Sustainability Solutions, LLC**

To: Ecology Team

RE: WAC-173-350 Public Comment – Factoring in Dehydration technology to lower costs and increase participation in food waste composting

→ Public Comment – FSS Recommendation to Amend creating artificial costs and to increase the number of Compost sites in WA willing to accept food waste, if it's dehydrated

To Whom It May Concern:

FoodService Sustainability Solutions (FSS) is the manufacturer of commercial grade food waste dehydrator technology.

Our mission is to make environmental stewardship easier, less costly and more efficient when it comes to source separated organics (SSO) and polystyrene foam foodservice ware.

Our firm manufactures commercial grade dehydrators to process wasted food and non-edible organics on-site at the point-of-origin, where the organic waste is generated.

Dehydrated Food Waste (DFW), a feedstock that some refer to simply as "dehydrate", is fundamentally different in character than Wet Food Waste, because dehydrate is "shelf stable."

This means that, as long as it's stored in a dry location, (think, a bin with lid and latch), the dehydrate will not emit odors, nor begin to rot. This is because it's been dehydrated at temperatures between 165F and 195F for anywhere between 10 and 24 hours, depending on the size of the equipment. This distinction between Dry (dehydrate) and Wet food waste is critical to understand if you want to avoid creating unnecessary emissions due to unwarranted frequent collection, which puts more trucks on the road to haul material. Also, if you want to create space in the market for *more* Compost sites to receive dehydrated food waste, taking into account the unique properties of dehydrate will encourage more Compost sites to accept DFW, whereas if the legislation doesn't take into account the new technology and reward early adoptors, many Compost sites will skip the hassle and simply not take ANY food waste, based on limited experience and knowing about the headaches and odors associated with Wet Food Waste processing.

In the article I've uploaded, I cite Dr. Sally Brown a well-known expert who uses the term "shelf stable" when describing the most important attribute of dehydrated food waste. Understanding this feature of dehydrate is the key to understanding why the legislation, as it stands, is missing the mark. Currently, it is going to require innovative operators to incur extra (and unnecessary) hauling costs and it will

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discourage many Compost sites from even considering the idea of processing *any* food waste. Leaving the legislation as it is, will put more diesel, gas or other types of organics collection vehicles on the road to haul a material that is genuinely Not in need of frequent collection. Here's the section where Dr. Sally Brown mentions the term "shelf stable."

The pertinent quote attributed to Dr. Brown can be found in the uploaded *Poppy Seeds* magazine article, starting at the top of page 49. This magazine is a publication of the California School Nutrition Association (CSNA).

According to Dr. Sally Brown, Research Associate Professor at the University of Washington's School of Environmental and Forest Sciences and *BioCycle* Trailblazer and frequent contributor:

"Dehydration is a common tool to produce a shelf stable product. Instant mashed potatoes are just one example of shelf stable food. Commercial scale dehydrators for food scraps create a similar shelf stable product, with the exception being that it is not targeted for human consumption. Understanding the implications of this - for reduced collection frequency, reduced weight and greater flexibility for end uses is critical to the goals of SB 1383. It is likely the beginning of a new era in food scrap management with a number of home appliances under development or in market to do the same."

Granted, she was then referring to the glaring omission in California's SB-1383, but now Washington has a chance to **Lead on this issue and to achieve two Goals that no other state to date has managed:**

- 1) Reduce unnecessary hauls and allow dehydrated food waste to be collected 1xMonth or even 1xEvery-Other-Month (EOM)**
- 2) Encourage more Composters to accept dehydrated food waste (DFW), even if they would otherwise choose Not to accept any food waste at all; this will create more Compost sites receiving food waste and shorten distances to compost sites, as a result.**

The main reasons organic food scraps or source-separated-organics (SSO) have historically been required to be collected at least once a week (1xWk or 2xWk) or sometimes once every-other-week (EOW), depending on the state, is because during the natural decomposition process, organics quickly produce offensive odors and attract flies and nuisance pests. However, when one dehydrates material on-site and then keeps it in some form of dry storage, one has eliminated 70% to 80% of the mass (and weight) AND created a "shelf-stable" material that will remain stable so long as it's kept dry, for months or even years! While we understand the basis for usually wanting certain types of Wet materials removed at least 2xWk, it makes no sense if that material has been dehydrated. We would welcome a phone call or conference call to further explain our case.



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In addition to feeling dehydrated food waste should have a separate Standard that reflects its unique characteristics, we also think you should create a compromise option for some Compost locations to be licensed or permitted to receive dehydrated food waste. This would increase the number of locations willing to accept food waste, so long as it's dehydrated first. Many sites would otherwise choose to simply Not accept ANY source-separated-organics.

Many Composters are simply choosing Not to accept food scraps because they understand the odors and challenges of running an operation when Wet food waste is part of the equation. I could provide one example of a university in Washington that does not have a Compost site close enough to effectively divert their Organics away from the Landfill. The site closest to them, would consider taking in Dehydrated Food Waste (DFW) if there were a way to get permitted to only take in dehydrate, but still opt Not to accept Wet Food Waste.

When one adds dehydrate (a Nitrogen source) to one's Carbon (dried sticks or leaves, or wood chips), one can bypass the undesirable odor phase and reach thermophilic temperatures within 72 hours, from the microorganisms that are dormant in dehydrated food waste. I have worked with the U.S. Compost Council and participated in the weeklong Operator Training Workshops (CREF) with Cary Oshins, and used dehydrate in one of the piles that are built during that Training. The dehydrate is best when blended at a ratio of 1 bucket dehydrate, blended with 6 to 8 buckets of your Carbon source. Then, add water and mix. Within 72 hours we reached thermophilic temperatures and satisfactory oxygen levels.

Our ask is fairly simple: Please acknowledge that Dry dehydrate is fundamentally different and should not be required to be collected as frequently as is its next-of-kin, Wet Food Waste. Yes, it is food waste. No it does not warrant frequent collection.

FSS urges you to factor in the innovation that has already occurred with the dehydration technology now available and not ignore this exciting new way to decrease hauls required to divert food waste while encouraging more compost facilities to choose to accept this unique type of food scraps, even if they still opt Not to accept Wet Food Waste.

Thank you so much for your consideration. I am prepared to come meet with your team to further discuss, but do hope you can amend the legislation to account for the benefit dehydration technology can deliver, if only the legislation will not penalize users of such technology by treating them as if they were still generating Wet organics.

Thank you so much for your consideration.

Respectfully, *Kim D. Eger*

Kim D. Eger, Senior Vice President