

Restaurant 2 Garden (Joycelyn Chui)

Restaurant 2 Garden thanks the Washington State Department of Ecology (Ecology) for the opportunity to comment on the proposed code revision for Chapter 173-350 WAC – Solid Waste Handling Regulations, we respectfully requests Ecology to consider our hyperlocal composting initiative's comments.

On page 77, Table 220-A, rows 2 and 3, regarding "All organic feedstocks limited up to 20 percent food waste", we strongly advocate for the following:

1) Allow an exemption if the compost operation is fully enclosed, e.g., in-vessel composter that is designed to provide effective means to control rodents, insects, birds, and other vectors while achieving an effective aerobic decomposition environment with a proper carbon to nitrogen ratio and appropriately sized bio-filter.

2) Or to increase the upper limit of food waste to up to 50 percent if an in-vessel composter is used to compost organic feedstocks. As an in-vessel composter is designed to provide effective means to control rodents, insects, birds, and other vectors while achieving an effective aerobic decomposition environment with a proper carbon to nitrogen ratio and appropriately sized bio-filter.

Justification: we believe the 20 percent food waste limit will place an unreasonable restriction to operations that use in-vessel composters that is capable to manage more than 20 percent food waste at a given time and maintain proper operating standards aligned with desired vector control.

On page 77, Table 220-A, rows 1 and 2, regarding "All material must be generated on site", we strongly advocate for removing that specific requirement of the origin of the material as it would jeopardize community based composting initiatives, particularly those that operate in an urban setting where carbon materials are often NOT generated on site. For example, within a neighborhood, urban multifamily complex or food bank, urban business district.

Thank you for your consideration.

Best,

Joycelyn Chui