



1195 Third Street Suite 101, Napa, CA 94559  
707-253-4351 | [countyofnapa.org/recycling](http://countyofnapa.org/recycling)

June 16, 2021

Upper Valley Disposal & Recycling  
1285 Whitehall Lane  
St. Helena, CA 94574

Re: Letter\_JPA\_Accepted\_materials\_Compost\_6-9-2021

Dear Upper Valley Disposal & Recycling,

Upper Valley Waste Management Agency (UVWMA) acknowledges receipt of the letter from Upper Valley Disposal & Recycling (UVD&R) titled "Letter\_JPA\_Accepted\_materials\_Compost\_6-9-2021", which is included as an attachment to this letter.

UVD&R is the franchised hauler for UVWMA, currently under a 15-year evergreen contract signed by the UVWMA Board of Directors. UVWMA would like to thank UVD&R for their continued cooperation to provide the best service to residents and businesses up valley, while also providing a service that meets CalRecycle and local diversion goals.

UVWMA acknowledges that UVD&R's compost is certified organic by Organic Materials Review Institute (OMRI). However maintaining an OMRI certification is a choice by UVD&R and it is not required in the current agreement between UVD&R and UVWMA.

Senate Bill 1383 (SB 1383) requires that jurisdictions provide organic waste collection service to all residents and businesses. Organic waste is defined as "solid wastes containing material originated from living organisms and their metabolic waste products including, but not limited to, food, green material, landscape and pruning waste, organic textiles and carpets, lumber, wood, paper products, printing and writing paper, manure, biosolids, digestate, and sludges".

According to the CalRecycle SB 1383 FAQ on the CalRecycle website, addressing the question "What is the definition of the term 'break down'? What is the extent of the break down required for paper to be considered compostable"? CalRecycle states "There is no regulatory definition of 'break down.' CalRecycle uses the term break down once in the regulations in the definition of non-compostable paper. 'Non-compostable paper includes, but is not limited to, paper that is coated in a plastic material that will not break down in the composting process.' The term break down was intended to mean to fully break down from the original material into compost. If a material does not break down into compost during the composting process it is non-compostable. Non-compostable paper should not be collected for composting. However, SB 1383 does not limit organic waste recovery to only compostable organic waste. The law requires the state to divert 75 percent of all organic waste from landfills into recovery activities by 2025, which includes both compostable and non-compostable materials. Composting is not the only method of recovery. There are other means of recovering organic



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waste, including anaerobic digestion. Non-compostable paper may be collected and recovered with other paper material, rather than food waste and green waste, and sent to a paper recycler instead of being transformed into compost, biofuel, or electricity.”

CalRecycle has stated that it is optional whether jurisdictions allow compostable plastics in the collection stream via the green container and that a jurisdiction will not be found non-compliant with SB 1383 if they do not require all compostable plastics to be fully composted. However it is possible that in the future CalRecycle will require that jurisdictions find a way to divert compostable plastics, whether through the regular compost stream or another collection and processing method. UVMWA would also like to highlight that CalRecycle has not taken a formal stance on if paper products lined with compostable plastics are considered paper or compostable plastic. There may be a future need for UVD&R to accept a wider variety of organic materials, even if that creates a need for UVD&R to produce a non-organic certified compost product, possibly in addition to the certified organic compost product.

In an effort to align with the items accepted by service providers in the City of Napa and south Napa County as much as possible and meet SB 1383 requirements, UVWMA proposes that the following items are accepted in the compost stream for both businesses and residents. This list will be re-evaluated each fiscal year and if/when CalRecycle updates their list of organic materials that must be diverted from the landfill.

#### All Food

- All prepared, cooked & spoiled foods
- Bread
- Coffee grounds & loose tea
- Dairy products & cheese (no liquids)
- Eggs & eggshells
- Fruits & vegetables, including pits & shells
- Meat & poultry, including bones
- Pet food
- Rice, beans, grains & pasta
- Seafood & shellfish
- Solid fats & grease (no liquids)

#### Food-Soiled Paper

- Bamboo paper plates and bamboo cutlery
- Food-stained pizza boxes and paper bags
- Paper coffee filters
- Paper towels, napkins & tissues
- Tea bags
- Unlined paper take-out containers, unlined paper plates & other unlined paper products meant to contain food and/or drink



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#### Yard Waste / Other Organics

- Biodegradable Products Institute (BPI) certified compostable bags
- Branches & stems under 6" diameter
- Cotton balls & cotton swabs with paper stems
- Flowers & floral trimmings
- Leaves & grass
- Manure & animal bedding (No cat, dog, or human feces or kitty litter)
- Natural cork
- Non-synthetic hair, fur & feathers
- Sawdust, wooden chopsticks, toothpicks and clean (non-painted/treated) wood items under 36"

#### Not Accepted

- Aluminum foil & foil-lined food wrap
- Butcher paper
- Cat, dog & human feces, kitty litter
- Compostable or polylactic acid (PLA) plastic, with the exception of BPI certified compostable bags
- Foam or polystyrene
- Hazardous waste
- Liquids
- Paper products lined with compostable or PLA plastic
- Paper products lined with plastic
- Plastic bags
- Products coated with petroleum-derived waxes. This may include waxed cardboard, wax paper and other waxed products.
- Single use food ware that contains fluorinated chemicals (PFAS)
- Treated or painted wood
- Wipes, diapers & feminine products

Thank you,

Amanda Griffis

Staff, Upper Valley Waste Management Agency

CC: Steve Lederer, Upper Valley Waste Management Agency Manager

Upper Valley Waste Management Agency Board of Directors



June 9, 2021

Upper Valley Waste Management Agency  
Attn: Steve Lederer, Director & Amanda Griffis, Resource Specialist  
1195 3<sup>rd</sup> Street  
Napa, Ca. 94588

Dear Steve and Amanda,

We are finalizing outreach for the residential food scrap compost program and are working to get consensus on the acceptable materials. For the brochure and website, we would like to adhere to the following materials that are listed materials with OMRI, Organic Material Research Institute.

We are making one exception to the attached list of materials and are allowing compostable bags that carry the Biodegradable Products Institute's "compostable" symbol to be used in the collection program. Currently, this is the only compostable plastic we are comfortable accepting. Over time, as products become approved by OMRI, we would be willing to adapt and accept more materials. As a reminder, our compost is certified organic and has been for decades with OMRI and California Department of Food and Agriculture. Farmers in-particular demand the OMRI seal prior to purchasing compost for their crops.

We would like to remove paper cups from the current food soiled paper list. Almost all the paper cups on the market today are lined with thin plastics and some Dixie type cups will be wax lined. Wax paper and wax butcher paper would also be prohibited.

Please confirm that we agree on what materials should be accepted in both the commercial Food Scrap and Compost programs. See page 2 and 3 for uniform materials. We greatly appreciate our partnership and look forward to the roll out of these long-awaited programs; this will benefit our community for years to come.

Warm regards,

Christy Pestoni

A handwritten signature in blue ink that reads "Christy Pestoni". The signature is written in a cursive, flowing style.

Chief Operating Officer  
Christy@uvds.com

## What Can I Compost - Lots of Items!

### All Food

- Fruits & vegetables
- Seafood & shellfish
- Meat & poultry/bones
- Fats & grease
- Rice, beans & pasta
- All prepared & cooked foods
- Bread
- Dairy products/cheese
- Eggshells

### Food-Soiled Paper

- Paper towels, napkins, tissues
- Coffee grounds, filters & tea bags
- Paper take-out containers

### Yard Waste / Other Organics

- Leaves & grass
- Branches & stems
- Sawdust / non- painted wood
- Floral trimmings / holiday greenery
- Hair, fur & feathers

### Please NO

- Plastic bags, PLA “Compostable Plastics”
- Styrofoam, wax paper cups & products
- Aluminum foil/ foil-lined food wrap
- Wipes, diapers, feminine products
- Liquids
- Hazardous waste
- Cat & dog waste / cat litter

**Table 1:** Allowed and prohibited materials for use as Compost Feedstocks

Input	Type	Feedstock Examples	NOP Compliance
<b>Food Waste and Green Waste</b>	Greenwaste	Food residues, paper, food soiled paper (coffee filters, paper cups, plates), raw wood (sawdust, chips), stumps, prunings, bark, grass clippings	<p><b>NO:</b></p> <ul style="list-style-type: none"> <li>plastic utensils</li> <li>bioplastics</li> <li>Styrofoam</li> <li>plastic mulches</li> <li>materials recovered from mixed municipal solid waste</li> </ul>
	Food Processing Waste / AG Byproducts	Tomato puree, grape pomace, rice hulls, mushroom growing media; cannery wastes & cannery waste water	<b>NO</b> additives added after material becomes waste stream
	Aquatic plants	Seaweed, kelp; aquatic plants	<b>NO</b> synthetics unless allowed
	Processed Wood	Construction wood	<p><b>NO:</b></p> <ul style="list-style-type: none"> <li>painted, stained or treated wood</li> <li>plywood</li> <li>pressboard</li> </ul>
	Unprocessed Slaughter By-products	Skulls, bones, blood, flesh, urine, eggshells, whole eggs, feathers, hair, sea creatures	<b>NO</b> additives added after material becomes waste stream
<b>Manure</b>	Animal Manures	Animal manure with bedding, manure tea, urine	<p><b>NO:</b></p> <ul style="list-style-type: none"> <li>biosolids/sewage sludge</li> <li>manure ash</li> </ul>
<b>OTHER</b>	Mineral	Nonsynthetic limestone	<p><b>NO</b> synthetic calcium carbonate (beet lime, PCC), quicklime, sheetrock/drywall</p> <p><b>NO</b> glossy, colored or waxed paper products</p>
	Allowed synthetics	Newspaper, Paper with some recycled content, unwaxed cardboard  Aquatic plant extracts, Elemental sulfur, Humic acids, Lignin sulfonate, MgSO <sub>4</sub> , Micronutrients, Liquid fish products, Vitamins	<p>Additional Information:</p> <ul style="list-style-type: none"> <li>Extracted with potassium or sodium hydroxide only</li> <li>Lignin sulfonate allowed only as a chelating agent or dust suppressant</li> <li>Vitamins B1, C and E</li> </ul>
	Formulated/Processed Feedstocks (non-wastestream)	Fertilizers (bloodmeal, alfalfa meal), plant extracts, inoculants, odor controls (lime, ash)	<p><b>NO:</b></p> <ul style="list-style-type: none"> <li>kiln dust</li> <li>lye</li> <li>synthetic preservatives</li> <li>prohibited processing aids</li> </ul>
	Ash	Plant/animal ash, biochar	<p><b>NO:</b></p> <ul style="list-style-type: none"> <li>ash produced from treated or painted wood</li> <li>manure ash</li> </ul>
	Commercial/Industrial	Agricultural wastewater products, grease trap oils	<b>NO</b> nonagricultural industrial byproducts are prohibited unless explicitly allowed