



# Solid Waste Facilities

## Incinerator

708 8<sup>th</sup> Street NW  
PO Box 179  
Fosston, Minnesota 56542  
(218) 435-6501 Telephone  
(218) 435-6619 Fax  
ESA: [jon.steiner@co.polk.mn.us](mailto:jon.steiner@co.polk.mn.us)  
Facility Mgr: [ron.larson@co.polk.mn.us](mailto:ron.larson@co.polk.mn.us)

## Landfill

Located: Gentilly, Minnesota  
PO Box 179  
Fosston, Minnesota 56542  
(218) 281-5419  
Accountant: [julie.mathison@co.polk.mn.us](mailto:julie.mathison@co.polk.mn.us)  
Secretary: [debbie.kappedal@co.polk.mn.us](mailto:debbie.kappedal@co.polk.mn.us)

December 21, 2022

Mr. Nathan Reinbold  
2115 S. Jefferson St  
Alexandria, MN 56308

RE: Support for Amendment to MS 325E.046  
Transparency in Compostable Product Labeling

Dear Mr. Reinbold,

Polk County owns and operates a Source Separated Organic Material (SSOM) Compost Facility (MPCA Permit: SW-124). The SSOM Facility was permitted in 2017, and constructed in 2019. It is utilized by our Regional Partners – the Counties of Beltrami, Clearwater, Hubbard, Mahnommen, Norman and Polk.

Acceptance of questionable “compostable” materials has been a major concern for our Facility. The concern was so great that Polk refused to accept compostable products (utensils, plates, containers, bags, etc.) in SSOM loads from generators unless prior approval was granted from Polk. This created much frustration with commercial organics generators looking to use those types of products. However, several requests for approval were denied when the documentation provided by the generator failed to show the product was entirely composed of, or met the requirements of, ASTM D6400 or D6868. Many of the products denied acceptance contained many of the ‘buzz words’ or were carefully worded to imply they met the requirements for being compostable, but stopped short of stating the entire product met the ASTM D6400 or D6868 certification.

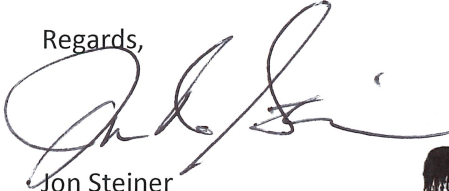
Polk and our Partner Counties support efforts to require clarity and transparency by mandating the labeling of any compostable products to be sold in Minnesota by any vendor, supplier or retail sales.

However, we do have concerns with the following provisions:

- 1) We believe the Statute should clearly state/indicate the product is made entirely with compliant ASTM D-6400 or D-6868 materials. (*questionable compostable materials often state they use some materials meeting 6400/6868, but not entirely made from those materials.*)
- 2) We don’t support a gradual “phase-in” approach to allow vendors or retailers to “phase-out” their inventories. The Statute should set a date by which it would be illegal to offer to sell, sell or use non-compliant products. (*Let them sell it in another State or throw it away. Delayed “phasing” only encourages the flooding of our facilities with these non-compostable products.*)
- 3) We don’t believe its necessary to give the MPCA or MN Attorney General powers they already have delegated to them. The issue is these entities have been reluctant to use those powers. We believe the liability should be placed on all parties (wholesaler, retailer and generator) for using non-compliant products, and enforcement is mandatory with annual report by enforcement entity of each complaint received, review of complaint and enforcement outcome.

By way of this letter, Polk and its Partner Counties involved in the SSOM Compost Facility declare their support for Statute modifications to require a clear and transparent labeling of compostable products to be sold or used in Minnesota.

Regards,



Jon Steiner  
Polk SWA



Garry Johanson  
Norman SWA



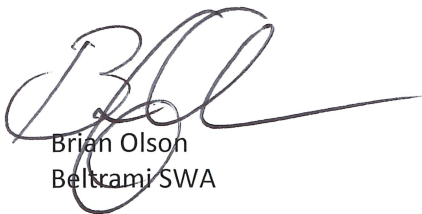
C.J. Holl  
Mahnomen SWA



Josh Holte  
Hubbard SWA



Dan Hecht  
Clearwater SWA



Brian Olson  
Beltrami SWA

