

RIVERSIDE COUNTY
SOLID WASTE MANAGEMENT ADVISORY COUNCIL

LTF COMPOST SUBCOMMITTEE

AGENDA

April 14, 2014
10:00 a.m. - 12:00 p.m.

Riverside County
Waste Management Department
14310 Frederick Street
Moreno Valley, CA 92553

ITEM

1. Call to Order and Self Introductions
2. Selection of Subcommittee Chairman
3. Approval of March 10, 2014 Meeting Minutes
4. Review of Composting Best Management Practices
5. Establishment of Financial Assurances Formula
6. Land Application of Ground Green Material
7. Setting of Schedule for Future Meeting Time & Place
8. Adjournment

**RIVERSIDE COUNTY
SOLID WASTE MANAGEMENT ADVISORY COUNCIL
LTF COMPOST SUBCOMMITTEE**

MINUTES

March 10, 2014

The following were present:

MEMBERS

PRESENT

Bruce Scott Farming Community
Greg Reyes Environmental Health/LEA
Ron Bray Riverside County Agriculture
Nick Young CDFA (Via Conference Call)

REPRESENTING

MEMBERS

ABSENT

Robert Magee 1st District Supervisor's Office
Dan Noble Association of Compost Producers
Gary Koontz Waste Haulers

REPRESENTING

County Staff

Hans Kernkamp Waste Management Department
Ryan Ross Waste Management Department
Joe McCann Waste Management Department
Lucy Gonzalez Waste Management Department

Representing

Guests/Interested Parties

Paul Ryan
Matthew Cotton
Chris Cunningham
Cindy Li

I. CALL TO ORDER AND SELF-INTRODUCTIONS (Note: Items I & II were discussed out of order).

The meeting was called to order at 10:15 a.m., with self-introductions.

II. Selection of Subcommittee Chairman

Hans Kernkamp advised the selection for Chairperson will be done at the next meeting when we have full membership.

III. Review of Composting Best Management Practices

Ryan Ross – distributed a draft list of Best Management Practices (BMPs) to the group. Mr. Ross said the BMPs are a result of the Board of Supervisors direction to County staff to ensure that composting operations will not negatively impact local residents and generate odors that were experienced at Cal Biomass. The BMPs were prepared by the Waste Management Department (WMD) in collaboration with Environmental Health (LEA). The BMPs were developed primarily based on AQMD and Water Board rules, Title 14 language, as well as common industry practices. The goal is to apply the BMPs towards all composting projects that come through the County for land-use entitlements. The BMPs would be applied as conditions of approval for a facility's Conditional Use Permit (CUP). This way the County Planning Department, as well as Code Enforcement, would have additional control over the operation of facilities. As it stands now, the LEA is the primary regulatory agency for compost facilities. The Water Board is involved, as well as AQMD, but with these BMPs, the County is added as an additional layer of oversight for composting facilities.

The subcommittee's focus of discussion was on the need for regulatory consistency with the BMPs as they relate to the South Coast Air Quality Management (AQMD) Rule 1133.3, Water Board, and Titles 14 and 27, with the goal of avoiding inconsistencies and conflicts with established and future composting regulations. The following were main points of discussion:

- Two interested parties (Mr. Ryan and Mr. Cotton) expressed concerns that the BMPs are limited to specific existing regulations and do not allow for flexibility if regulations change in the future. Mr. Cotton stated that at least three of the definitions in Title 14 are proposed to be changed within the next year and the BMPs should be written with enough generality to accommodate future regulatory changes. Waste Management Department staff will review the BMPs and provide a streamlined version for review at the next meeting.
- Two interested parties (Mr. Ryan and Mr. Cotton) expressed concerns about the applicability of the BMPs to composting facilities that receive EA Notification permits from the LEA, but fail to go through the entitlement process with County. Mr. Reyes stated that the LEA is required to issue EA Notification permits to applicants that meet the criteria and there is no requirement that the facilities obtain land-use approval (CUP) from the County before the LEA issues the permit; rather, the applicant must simply notify the local planning department. LEA notifies the Planning Department about the facilities. Planning and Code enforcement should be enforcing the County's land-use ordinance which requires the facilities to obtain land-use approvals, if appropriately located/zoned. Mr. Ryan requested that the Planning Department be invited to the next meeting to explain the process for enforcement.
- In response to concerns from Mr. Reyes regarding the Waste Management Department (WMD) being both a regulated party and a regulator (via enforcement of BMPs), Mr. Ross stated that WMD would not be regulating this process. County Planning and Code Enforcement will enforce the BMPs. WMD would be the party for administration of the agreements and bonds as part of a project complying with WMD's respective conditions of approval.

IV. Establishment of Financial Assurances Formula

- The subcommittee agreed in principal that a financial assurance formula would be equitable and effective. For the next meeting, sub-committee members and WMD staff will work on developing a formula that is specifically tied to storage capacity and feedstock composition.

V. Land Application of Ground Green Material

Mr. Scott and Mr. Ryan discussed problems associated with land application of green material. Private land owners are accepting large quantities of ground green material and spreading the material throughout their property, with the claim of being used for agricultural purposes. Often times this is not the case. Mr. Ryan stated that the regulatory community is starting to apply strict regulations, especially within the San Diego region. He offered to provide a copy of the Tentative General Discharge Requirements from commercial agriculture operations to the sub-committee for review and discussion at the next meeting.

Mr. Reyes distributed information regarding the Ventura County ordinance (Division 4, Chapter 7, Article 1, Section 4700 et seq.) and a current version of the proposed State regulations for land applications and CalRecycle's current ruling for discussion at the next meeting.

Mr. Ryan asked if other individuals can join the subcommittee. Mr. Kernkamp advised that the membership is limited to the seven members established by the Local Task Force (LTF), and other individuals can attend the meetings as an interested party.

VI. Setting of Schedule for Future Meeting Time & Place

The next meeting was scheduled for 10:00 a.m. on April 14, 2014 at the WMD Headquarters.

VII. Adjournment

Meeting adjourned at 12:20 p.m.

Composting Operations	Riverside County Best Management Practices
Applicability	The County BMPs shall be applied to all composting operations undergoing the entitlement process for a Conditional Use Permit (CUP), <u>Plot Plan, or other land-use entitlements.</u>
Feedstock (F)	1. Acceptable feedstock materials include: <ul style="list-style-type: none"> • Greenwaste as defined in <u>Title 14 CCR</u>, • Agricultural materials as defined in <u>Title 14 CCR</u>, • Food Material that meets the definitions in <u>Title 14 CCR</u>, • Manure as defined in <u>Title 14 CCR</u>, • Paper products • <u>Restaurant grease and oils</u> • <u>Digestate (if permissible under Title 14 CCR)</u>
Additives (Ad)	If applicable: <ol style="list-style-type: none"> 1. Mix additives with feedstock or active compost to create favorable composting conditions. 2. The amount of additives added shall be consistent with applicable regulatory requirements or prevailing industry standards 3. Additives do not include septage, biosolid, or compost feedstock. 4. Additives shall undergo random load-checking for physical contaminants and refuse.
Amendments (Am)	If applicable: <ol style="list-style-type: none"> 1. Add amendments to cured or stabilized compost to provide attributes for the products. 2. The amount of amendments added shall be consistent with applicable regulatory requirements or prevailing industry standards. 3. Amendments do not include septage, biosolid, or compost feedstock. 4. Amendments shall undergo random load-checking for physical contaminants and refuse.
Feedstock Preparation (FP)	<ol style="list-style-type: none"> 1. <u>Feedstock load-checking operations shall be conducted in accordance with the standards set forth in Title 14 CCR.</u> 2. <u>Removal of physical contaminants and refuse (overs/trash) shall be removed from the facility in accordance with Title 14 CCR, or within seven (7) days of screening, whichever date is sooner.</u> 3. <u>Greenwaste shall be processed/ground within the timeframes provided in Title 14 CCR.</u> 5. Foodwaste and manure shall be covered with ground greenwaste, or unscreened or screened compost within 3 hours of receipt and incorporated into an active pile within 48 hours of receipt to minimize odor generation and attraction to vectors. 6. <u>Incorporate wet or odiferous feedstock loads directly into actively composting windrows or aerated static piles, where practical.</u> 7. Mix odiferous feedstock materials with appropriate amount of bulking agent, high carbon amendments, or finished compost and then moisture conditioned to reduce odor releases. 8. Manure shall not exceed 20% by volume. 9. Restaurant grease and oils shall not exceed 5% by volume. 10. Application of restaurant grease and oils shall comply with the following standards: <ol style="list-style-type: none"> a. Apply to processed feedstock or an active window/pile at the time of receipt. b. Mix with processed feedstock prior to or during pile formation.

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Reject odiferous feedstock delivered to the facility, or follow procedures in FP 6 & 7.

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	<p>c. Once grease trap liquids have been applied to a windrow, the windrow will be turned immediately to incorporate the liquid into the windrow feedstock.</p> <p>d. At no time shall grease trap liquids will be stored onsite in tanks or ponds.</p> <p>e. Grease trap liquids will not be applied in a manner that results in ponding around the windrow/pile.</p> <p>f. No direct application to an active windrow that still has a compost cover for emissions control, as required by SCAQMD Rule 1133.3.</p> <p>g. Directly apply to an active windrow that no longer requires a compost cover, or to an active static pile that is aerated under negative pressure and uses an emissions control device, as required by SCAQMD Rule 1133.3.</p> <p>11. Grinding of odiferous feedstock materials should be accompanied with the application of misting water <u>or other odor control measures approved by the DEH/LEA.</u></p> <p>12. Feedstock composition must be adjusted to achieve a high carbon to nitrogen ratio (30:1), proper moisture contents, and good porosity, all of which are conducive to aerobic decomposition and odor minimization.</p> <p>13. Reduce material mixing activities in unfavorable weather conditions (stagnant air or windy) to minimize odor generation.</p>
Active Composting (AC)	<p>1. Static pile composting method is prohibited for facilities that will contain more than 5,000 cubic yards of material (including feedstock, additives, amendments, chipped/ground material, and compost) at any one time.</p> <p>2. Active composting shall be by means of either the windrow method, aerated static pile, extended aerated static pile, or an alternative technology approved by the LEA/DEH.</p> <p>3. Where feasible, the active composting pad location and windrow/pile configuration and orientation should be such that wind-driven off-site exposures of receptors to composting odors can be minimized.</p> <p>4. Daily monitoring of windrow moisture content and temperature shall be conducted to ensure continuous aerobic composting and detect overheating so as to avoid spontaneous combustion.</p> <p>5. All windrows and piles aerated with positive <u>or negative</u> pressures shall be covered with a layer of finished compost, <u>or other covering methods as approved by LEA/DEH,</u> immediately after windrow and/or pile formation.</p> <p>6. Moisture conditioning of active windrows and piles during the rainy season should be coordinated with weather forecasts. The composteer should use his best judgment on the degree of watering to be carried out when rainfall is forecasted. As a good practice, no moisture conditioning should be carried out during rainfall or when there is a 60% or greater chance of rainfall in the next day or two.</p> <p>7. When heavy or extended rainfalls are forecasted, the composteer should take the appropriate measures to protect active windrows and piles from saturation with water, including but are not limited to: cover windrows and piles with tarps; add dry feedstock or compost on top of windrows and piles; and increase positive drainage on side slopes of windrows and piles by making the slopes steeper or covering them with tarps.</p> <p><u>8. The active composting pad shall be graded and maintained to prevent ponding and transmit any free liquid laterally to containment structures on-site. The composting pad and containment structures shall be designed and constructed in compliance with all applicable water quality control regulations.</u></p> <p>9.</p> <p>10. All windrows shall be turned regularly to ensure continuous aerobic composting, or according to applicable regulatory requirements pertaining to achieving pathogen reduction and odor minimization standards.</p>

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	<p>11. Avoid windrow turning in unfavorable weather conditions.</p> <p>12. Where applicable, c construct smaller windrows to increase the surface to volume ratio, thus aeration efficiency.</p>	Deleted: c
Compost Curing (CC)	<p>1. Curing of compost shall be conducted away from the active composting area to avoid cross-contamination and facilitate separate odor monitoring.</p> <p>2. Curing compost that have temperature exceeding 122°F, or are seeping leachate, and/or emitting odors on a consistent basis shall be re-composted in the active composting area.</p> <p>3. Long-term storage of finished compost shall be limited to no greater than one year to avoid it becoming a fire hazard.</p> <p>4. Screen compost to facilitate aeration and expedite the curing process.</p> <p>5. Avoid screening of compost in unfavorable weather conditions, or apply misting water or other odor reducing measures, as approved by the LEA/DEH during screening to lessen odor emissions.</p>	Deleted: a
OIMP Implementation (OI)	<p>1. The facility shall have a designated full-time staff in charging of implementation of the facility's Odor Impact Minimization Plan (OIMP) and handling of odor complaints and investigations. This person shall also be responsible for regular reviewing and updating of the OIMP in pace with changes in composting operation or procedures.</p> <p>2. The composting staff shall be well acquainted with and adequately trained to implement the OIMP.</p> <p>3. If the facility receives an infraction (Area of Concern and/or Notice of Violation) during monthly inspections from the LEA/DEH involving odors, in addition to addressing the LEA/DEH, the operator shall submit a Report to the County's Planning and Waste Management Departments, documenting the source of the odor and both propose and implement mitigation measures which may include installation of wind barriers, such as contiguous tall vegetation, misting systems, or other odor reducing measures, to the County's satisfaction.</p> <p>4. If after 15 days of implementing mitigation measures, as stated in the Report submitted to the County Planning and Waste Management Department's, the odor issues have not been resolved, as verified by the LEA, the operator shall immediately remove the odiferous material offsite for disposal in accordance with all applicable local, State, and Federal laws, ordinances, and regulations.</p>	Deleted: dampen
Facility Maintenance (FM)	<p>1. On-site dust control shall use domestic water, non-potable reclaimed water, or dust suppressants, as identified in SCAQMD Rule 403,</p> <p>2. Site drainage design shall prevent run-on onto the active composting area, feedstock storage area, compost curing area, and finished compost storage area.</p> <p>3. Surface run-off from all compostable materials processing, treatment, and storage areas shall be contained on-site, in compliance with applicable water quality control regulations.</p> <p>4. All wastewater conveyance and containment facilities shall be periodically inspected to ensure performance and assess their capacity to attract vectors and generate odors and to effectively collect and contain wastewater.</p> <p>5. Use compost filter berms to filter stormwater entering the containment structure. The compost filters can be reintroduced back to the composting process.</p> <p>6. Re-circulate retained wastewater into the composting process.</p>	Deleted: either
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Financial Assurances

Within 12 months after approval or initiation of compost activities, whichever comes first, the applicant shall provide and maintain in force during the life of the permit a maintenance assurance, clean up/restoration bond, or other acceptable assurance, approved by the County. The Surety must be licensed in the State of California. The financial assurance shall provide maintenance assurance, restoration, clean up or environmental remediation to the compost site property or adjoining parcels in the event composting activities, or other related activities at the facility, cause environmental damage, or necessitates County assistance with environmental remediation or clean-up. The amount of the financial assurance shall be in the amount of one million USD (\$1,000,000 USD). All financial assurance instruments in place for the existing operation shall remain in force until such time that the new financial assurance instrument, described herein, is secured. In addition to the financial assurance instrument, the assurance of maintenance, restoration and remediation is required by the Applicant processing and filing a 'Maintenance, Restoration and Remediation Agreement' through the Riverside County Waste Management Department. The format of the financial assurance and the Maintenance, Restoration and Remediation Agreement must be approved by County Counsel.