



LEA  CIWMB
PARTNERSHIP CONFERENCE

OUTSTANDING CONNECTIONS

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Permit Changes- Reacting to Multiple Operations and Permits

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Napa Garbage Service Compost Facility and MRF

History:

1994 – Permit issued for Full Compost Facility

1996 – Permit issued for MRF

1996 – Permit Issue #1 – Why Separate MRF Permit

2004 – Permit Issue #2 – Compost Facility Violations /Permits



Napa Garbage Service Compost Facility and MRF

Site Specifics:

- One property. 2-full SWFP's
- One County Use Permit.
- Light Industrial – includes big box wine company buildings (majority of “whiners”)
- Odor issues



Compost Facility Specifics

- 200 TPD Incoming Material.
- Feedstock: Curbside Green, landscape, wood, limited grape pomace
- 10 acres
- Max 60,000 cu.yd material on site
- Estimate 80% of permitted compost area being used
- No major operational issues



MRF Facility Specifics

- 360 TPD
- Enclosed building - Semi-Dirty MRF
- Majority Construction-Demolition material
- MSW with less than 5% putrescibles
- Target drop boxes with high recyclables
- 7 acres



ISSUE #1

How to permit the MRF for select loads from commercial haulers with high recyclables?



ISSUE #1 – Permit MRF

- 1996
- Existing Compost Permit – Same property
- Incoming compost tonnage – near max
- Existing CUP
- Moderate odor issues
- No permit tiers. All full permits
- Majority of material will be C/D



ISSUE #1 – Permit MRF

Options:

- Incorporate into existing compost permit
- Separate MRF permit
- Split property into separate permitted boundaries



ISSUE #1 – Permit MRF

Benefit of single MRF Permit

- Identify TPD and traffic to the new MRF permit.
- Future revisions will occur (no odor discussions)

Benefit of not revising Compost Permit

- Increase TPD
- Odor issues
- Public



ISSUE #1 – Permit MRF

Well? What do you do ??



ISSUE #1 – Permit MRF

Well? What do you do ??

- Separate MRF SWFP
- MRF waste stream not controversial
- Avoid controversy of true or perceived odor impact
- Avoid increasing TPD of “compost” material
- Your budget revenue just increased!!



ISSUE #2 – Compost Violations TPD

Issue:

- Several consecutive months above permitted TPD incoming green material
- Consecutive violations noted
- Owner/Operator notified an NOV is coming
- NOV issued – May 2004



ISSUE #2 – Compost Violations TPD

Criteria/Factors:

- Ongoing Violations for TPD above Permitted Max
- Odor issues(known, but few complaints directed to the LEA)
- Currently have Permit Tiers, revised compost regs, new C/D regs
- Many regulatory options to address the problem
- Minimal site impacts with the increased tons received
- Surrounding community/business would react to increase in tonnage associated to “compost material”
- MRF Permit processing areas are full



ISSUE #2 – Compost Violations TPD

Criteria/Factors cont:

- City of Napa – new owner of facility
- May 2004 – contractor bidding to retain the hauling franchise and site operation contract
- Owner/Operator comes to LEA - “What can we do to address the problem” (real paraphrase – “Sir Gregory, we have a lot at stake, we need your expert wisdom to get out of this mess, need to save my bonus”)
- Contractor operator eventually loses hauling franchise and operation in October 2005.
- Waste streams at the facility may change within 1-year.
- Wood debris can be separated and taken off-site quickly



ISSUE #2 – Compost Violations TPD

Options: ?

How to get the extra tonnage “legal”?

What does the LEA “Recommend” the
owner/operator do?

Literal Options – Tier Confusion – Don't slip me a MICKEY:

Revise full-compost permit
Revise MRF Permit
Small Volume CDI (<25TPD)
Small Volume C/D Wood C&G
Emergency CDI processing
Medium Volume CDI
Medium Volume C/D Wood C&G
Large Volume CDI
Large Volume C&D Wood C&G
Limited Volume transfer Operation
Medium Volume Transfer Operation
Large Volume Transfer Operation
Small volume Green Material C&G
Medium Volume Green Material C&G

Large Volume Green Material C&G
Ag Material Compost Operation
Green Material Compost Operation
Green Material Compost Facility
Research Compost Operation
Ag Site , <1000 CY compost annually
14 Excluded operations

Viabile Options – Tier Confusion

Viabile Options:

- Revise full-compost permit
- EA Notification on or off existing compost/MRF Boundary for Chip & Grind operation
- EA Notification on or off existing compost/MRF Boundary for Small Volume C/D Wood Debris Operation (<200TPD)
- Revise MRF permit to incorporated wood processing.



EA Notification on or off existing Compost/MRF Boundary for Chip & Grind operation

- (10) "Chipping and Grinding Operations and Facilities" means an operation or facility, that does not produce compost, that mechanically reduces the size or otherwise engages in the handling, of compostable material and:
 - (A) The site does the following:
 - 1. The site handles **only material, excluding manure, allowed at a green material composting operation or facility** as set forth in section 17852(a)(22); and
 - 2. Each load of green material is **removed from the site within 48 hours** of receipt. The EA may allow a site to keep green material on-site for **up to 7 days** if the EA determines that the additional time does not increase the potential for violations of this Chapter.
 - (B) If the site fails to meet the definition of green material because it exceeds the contamination limits in section 17852(a)(21), the site shall be regulated as set forth in the Transfer/Processing Regulatory requirements (commencing at section 17400).
 - (C) If the site fails to meet the definition of this section because the green material remains on-site for a longer period of time than allowed, then the site shall be regulated as a compostable material handling operation or facility, as set forth in this Chapter.



EA Notification on or off existing Compost/MRF Boundary for Chip & Grind operation

- **18103.1 Filing Requirements.**

- (a) Any operator proposing to engage in solid waste handling pursuant to an EA **notification shall notify the EA of its intent to operate in writing prior to commencing operations.** This written notification shall be legible and include the following information:
 - (1) The name, address, and phone number of the proposed operation; the name, address, and phone number where the operator can be contacted if these differ from the operation site; and, the name, address, and phone number of the owner if these differ from the operator.
 - (2) The section in Chapters 3 or 3.1 of Division 7 of this Title authorizing eligibility for this tier and a description of the facility's operations, including but not limited to, volume and types of wastes/material handled, peak and annual loading, and hours of operation.
 - (3) **Documentation that the operator has notified the local planning department** with jurisdiction over the site of its intent to commence operations. Documentation may include, **proof of compliance with CEQA**, correspondence from the local planning department that compliance with the California Environmental Quality Act is not required for the operation to obtain local land use approval or written notice to the local planning department of the operator's intent to commence operations.
 - (4) A statement by the owner and operator certifying under penalty of perjury that the information which they have provided is true and accurate to the best of their knowledge and belief.



EA Notification on or off existing Compost/MRF Boundary for Chip & Grind operation

- If Small Volume Wood Debris C&G Operation: you must also.....
 - Submit Operations Plan with 19 requirements.



EA Notification on existing Compost Boundary for Chip & Grind Operation

Conclusion:

- EA Notification - Compost Chip & Grind
- Benefits.....



911 (burger) permit call

One day prior to permit approval

- Burger = Permit
- 911 caller = owner/operator
- Burger chef = LEA
- Burger joint = LEA office
- 911 Operator = CIWMB Staff
- Lettuce/Tomato/Cheese/Onion/BBQ Sauce = Permit Conditions.



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Thank you