

Research Composting Operations

Regulatory Process Challenges

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Purpose:

To help others anticipate and avoid some of the pitfalls the Humboldt County LEA has experienced with research compost operation proposals

Defined:

“Research Composting Operation” means a composting operation, that is operated for the purpose of gathering research information on composting.

CCR T14 Section 17852(a)(34)

Section 17862 (a) - (e)

- (a) < 5000 cy all materials at any one time shall comply with Notification requirements
- (b) In vessel may >5000 cy if EA authorizes
- (c) Requires the operator to provide a description of the research to be performed, research objectives, methodology/protocol to be employed, data to be gathered, analysis to be performed, how requirements will be met, and projected timeframe for completion of research.
- (d) EA reviews Notification every two years-- includes results and conclusions drawn from research
- (e) *Mammalian specific regs.....*

Research compost operations in SWIS database, September 2007:

Active: 7

Closed: 2

Planned: 1

Two Main Challenges:

1. Many proposals do not meet definition of a research compost operation
2. Lack of research results and conclusions for review

Humboldt County 2003 - 2006

Number of proffered research compost proposals: 10

Number of complete Notification packages: 2

Number that actually operated: 1

Number produced results and conclusions: 0

Is it authentic compost research?

- Market research
- Transportation feasibility research
- Urgent waste diversion
- Making an event more “green”
- An attempt to increase one’s Groovy Status in the community
- A way to avoid obtaining a Compostable Materials Handling Facility Permit

To avoid struggling with “faux research”:

1. Read carefully the few regulations dealing with research compost operations
2. Review them with the proposed operator
3. Rely on the proposed operator to demonstrate clearly that her/his project meets the definition of §17852(a)(34)

To avoid struggling with “faux research”:

4. Discuss the required report contents
5. Accept only a complete Notification package
5. Inquire about data collection and research progress during routine inspections
6. Send a reminder before the results and conclusions are due for review

Ending a Research project:

- Use Final Report to determine whether or not research is completed.
- Is operation in compliance with Notification requirements?

Options:

- Close site
- Continue research for another two year period
- Find in default of Notification