

Survey Conducted by the California Integrated Waste Management Board on Barriers to Siting and Expanding Organic Diversion Facilities

The California Integrated Waste Management Board (CIWMB) conducted an on-line survey in 2008 to identify barriers to siting and expanding organic diversion facilities. The survey ran from February 27, 2008 to March 10, 2008 and listed barriers organized under six barrier groups. Survey-takers were asked to rate the barriers within each group, using a scale of 1 to 5, where “5” meant a major or important barrier, and “1” meant a weak barrier or not a barrier. They were allowed to use the same number more than once in each group.

The survey barriers are listed below. At the end of the survey, respondents were asked to provide contact information and were also given the option to choose whether they wanted to receive future notices about the project, be contacted regarding the survey, or not be contacted at all. The survey was available online and also emailed to people who did not have Internet access.

1. Land Use/Planning Barriers - These are potential barriers to siting or expanding organic diversion facilities that relate to land-use planning
 - a. Competing land use interests (e.g., parks and open space versus organics facility)
 - b. New or expanded organics facility impacts to infrastructure (e.g., increase traffic, water use)
 - c. Community opposition (Not in My Backyard)
 - d. Lack of local government planning for increased organics processing capacity

Other Land Use/Planning barrier(s) not listed above (please rate each barrier added using a 1-5 rating for each):

2. Regulatory Barriers - Lack of coordination between regulatory agencies or specific regulations that make it difficult to site new organic diversion facilities and expand existing facilities
 - a. Inconsistencies and/or contradictory goals across regulatory agencies or specific regulations that make it difficult to site new organic diversion facilities and expand existing facilities
 - b. Regulations and ordinances are too restrictive
 - c. No centralized and recognized regulatory authority and advocate for organic diversion
 - d. Difficulty in understanding all aspects of regulatory requirements since they are located in different areas of the California Code of Regulations and inconsistent with one another
 - e. Interpretation of California Environmental Quality Act (CEQA) by agencies inhibits siting and expansion of organic diversion facilities
 - f. Current uncertainty of pending air district rules and regional water board regulations which could place additional burdens on operators if enacted

- g. The impact that unnecessary regulations put on the cost of developing a facility
- h. Facilities that handle multiple feedstocks face additional challenges in complying with regulatory requirements from various agencies
- i. Lack of consistent enforcement of odor issues creates a stigma on all facilities
- j. Lack of assistance to local governments to help them address compliance issues at facilities
- k. Existing regulatory structure does not recognize beneficial end uses of organics (e.g., agriculture versus commercial sales) and treats all facilities similarly

Other Regulatory barrier(s) not listed above (please rate each barrier added using a 1-5 rating for each):

3. Permitting Barriers - A variety of barriers exist in making it difficult to permit new organic diversion facilities or expand existing facilities
 - a. The existing permitting process does not take into consideration new technologies and new data/information
 - b. Permitting is currently based on regulatory definitions that change
 - c. Solid waste permitting is difficult for facilities that handle multiple feedstocks
 - d. Air regulations pose significant hurdles to permitting
 - e. Water regulations (waste discharge requirements) pose significant hurdles to permitting
 - f. The existing requirement that food waste composting have a full solid waste facility permit, rather than Enforcement Agency Notification, makes it difficult to site new facilities
 - g. Operators are hesitant to make changes at diversion facilities since they could face time-consuming and costly local, regional and state requirements
 - h. There is no agreed upon methodology for confirming claimed processing capacities at facilities

Other Permitting barrier(s) not listed above (please rate each barrier added using a 1-5 rating for each):

4. Research/Data Barriers - Organic diversion methods are not always based on sound scientific principles and a demonstration of protection of public health and the environment
 - a. There is a lack of communication on net environmental benefits of organic diversion
 - b. Decisions regarding air emissions and their effects are not fully understood
 - c. Lack of research coordination, peer review process, and a coordinated approach for sharing of organics diversion information leads to misinformation
 - d. Air emission test methods, data and interpretation have not been subjected to peer review or standardization
 - e. Data for specific feedstocks and handling is not available
 - f. Regulatory agencies (Air Resources Board, California Integrated Waste Management Board, Regional Water Quality Control Board, etc.) do not share data/information

- g. Impacts to worker health and safety is lacking
- h. No action center, or ombudsman, exists to facilitate research waivers on new technologies, such as biofuels
- i. Technology demonstrations are not performed at appropriate scales and evaluated objectively

Other Research/Data barrier(s) not listed above (please rate each barrier added using a 1-5 rating for each):

5. Information Barriers - A variety of barriers to siting organic diversion facilities exist which are related to informing stakeholders and the public.
 - a. Poor public perception and lack of trust prevents the public from supporting organic diversion in their communities
 - b. All stakeholders, including regulatory agencies and the general public, do not understand the full benefits and impacts inherent to organic diversion
 - c. There is a lack of understanding the benefits and challenges of organic conversion technologies and biofuels (e.g., hydrolysis, gasification, anaerobic digesting, biomass to energy, biodiesel, ethanol, etc.)
 - d. Proponents of organic waste diversion facilities do not understand the permitting process and are unable to help regulators obtain reliable and independent performance information
 - e. Lack of reliable, accurate, quantitative data relating to air emissions and benefits of composting in California

Other Information barrier(s) not listed above (please rate each barrier added using a 1-5 rating for each):

6. Economic Barriers - A variety of economic barriers exist that make it difficult to site and expand organic diversion facilities
 - a. Land/property prices too high
 - b. Tipping fee for waste disposal at a landfill is too low
 - c. Low cost availability of alternative daily cover
 - d. Compost price too low
 - e. Construction costs too high
 - f. Capital cost too high (cost of capital)
 - g. Publicly owned and operated facilities make private investment non-economical since public facilities have advantages that are not available to the private sector and can out-compete private facilities for processing capacity

Other Economic barrier(s) not listed above (please rate each barrier added using a 1-5 rating for each):

- Overall Rating of Barrier Groups - Please rate the following with the same 1 -5 scale (you can use the same number more than once):

1. Land Use/Planning Barriers
2. Regulatory Barriers
3. Permitting Barriers
4. Research/Data Barriers
5. Information Barriers
6. Economic Barriers