

US EPA ARCHIVE DOCUMENT

# Role of the Local Enforcement Agency at the Clean World Partners Anaerobic Digester Projects in Sacramento





The Sacramento County Environmental Management Department is certified as the Local Enforcement Agency (LEA) by the California Department of Resources, Recycling, and Recovery (Cal Recycle)



CalRecycle is responsible for ensuring that State solid waste management programs are carried out via the LEAs



The LEA is responsible for permitting and inspecting solid waste facilities in Sacramento County and for enforcing local and State laws and regulations pertaining to solid waste handling



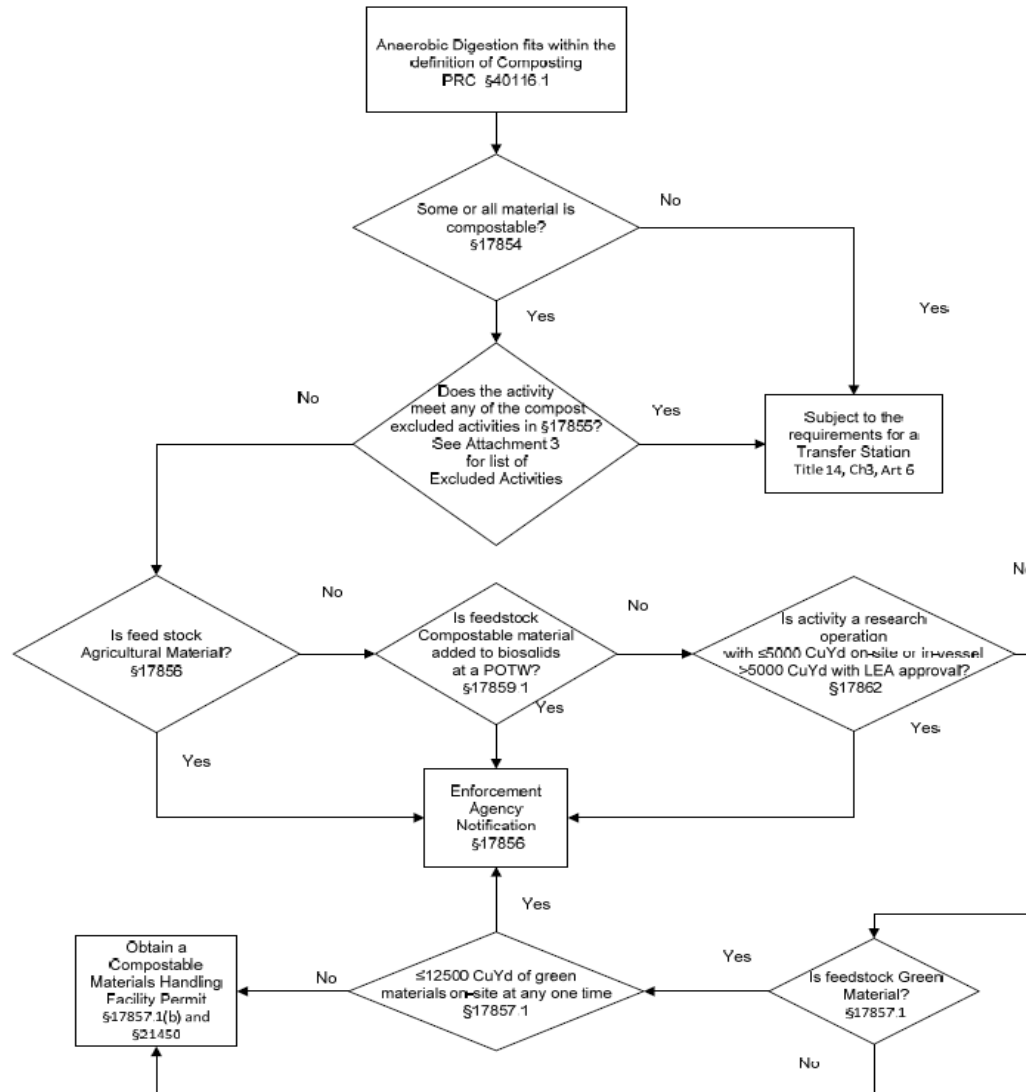
# Permitting an Anaerobic Digester

- Permit requirements are in the California Public Resources Code and Title 14 of the California Code of Regulations
- May be permitted either under the Transfer/Processing regulations or the Compostable Material Handling regulations in Title 14 (temperature & feedstock dependent)



- Determining the appropriate permit can be a confusing process for both regulators and operators

Decision Diagram for Anaerobic Digestion





## Tier Regulatory Placement for Anaerobic Digestion By Feedstock

TYPE OF FEEDSTOCK	EXCLUDED	EA NOTIFICATION	FULL PERMIT
BIOSOLIDS	STORAGE ON SITE AT A POTW	BIOSOLIDS ONLY SEPARATE FROM NORMAL TREATMENT AT A POTW	
GREEN MATERIAL	≤500 CU YDS ONSITE ≤1000 CU YDS GIVEN AWAY OR SOLD ANNUALLY	≤12, 500 CU YDS	>12,500 CU YDS, OR GREEN MATERIAL WITH OTHER WASTE INCLUDING FOOD
AGRICULTURAL MATERIAL (INCLUDES MANURE)	≤1000 CU YDS GIVEN AWAY OR SOLD ANNUALLY	ONLY AG MATERIAL	WHEN MIXED WITH OTHER WASTE INCLUDING FOOD
RESEARCH	<50 CU YDS	≤5000 CU YDS ON-SITE OR IN-VESSEL (>5000 CU YDS WITH LEA APPROVAL)	
FOOD WASTE	≤10 % FOOD WASTE, ONLY WITH GREEN MATERIAL ≤500 CU YDS, ON-SITE AND ≤1000 CU YARDS GIVEN AWAY OR SOLD ANNUALLY	ONLY WHEN ADDED TO THE TREATMENT OF BIOSOLIDS AT A POTW	ALL OTHER SITUATIONS

# Clean World Partners

## Anaerobic Digester Permit Tier

- Applied as a Research Composting Operation under the Notification tier
- The Notification tier is not subject to LEA discretion on permit conditions, CEQA review, or public review
- The research component of the project will be reviewed by the LEA after two years, at which time the facility may be required to obtain a full Solid Waste Facility Permit\*



\*Currently, composting food waste requires a full permit, but CalRecycle is reviewing the regulations for anaerobic digestion of food waste.



# Clean World Partners Anaerobic Digester Research Operation Application



- Submitted a research description, a site-specific Odor Impact Mitigation Plan, and a notice of intent to commence operations to the LEA
- Currently subject to quarterly inspections to ensure compliance with the State Minimum Standards



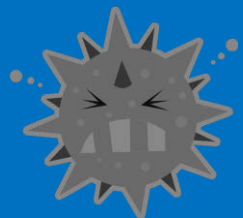
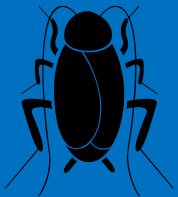




# State Minimum Standards for Anaerobic Digesters



- Chapter 3.1 of Title 14 of the California Code of Regulations
- Includes requirements for odor, dust, litter, traffic, noise, vector, & nuisance control
- Contains pathogen reduction requirements for in-vessel composting (3 days > 131 degrees Fahrenheit)



California Integrated Waste Management Board  
**Compostable Materials Handling Operation  
 and Facility Inspection Report**

Blue or Black Ink Pen

Enforcement Agency: _____		<b>For Official CIWMB Use Only</b>	
FACILITY FILE NUMBER (99-xx-9999)		INSPECTION DATE (MM/DD/YYYY)	
PROGRAM CODE (Select only one code) <input type="radio"/> LEA Periodic <input type="radio"/> CIWMB Closed Sites <input type="radio"/> CIWMB Focused <input type="radio"/> LEA Focused <input type="radio"/> CIWMB Enforcement Agent <input type="radio"/> CIWMB Periodic		Time In: _____	Inspection Time _____
Facility Name _____		Received By (Operator) Signature _____	
Facility Location _____		Owner Signature (if present) _____	
Inspector _____	Inspector Signature _____	Also Present (Name) _____	
<input type="radio"/> Attachments On File (Not Scanned)			

THE ABOVE FACILITY WAS INSPECTED FOR COMPLIANCE WITH APPLICABLE SECTIONS OF DIVISION 30 OF THE PUBLIC RESOURCES CODE (PRC), AND TITLE 14 AND TITLE 27 CALIFORNIA CODE OF REGULATIONS (CCR).

THE STANDARDS BELOW ARE CONSIDERED IN COMPLIANCE UNLESS OTHERWISE MARKED WITH ONE OF THE FOLLOWING: V=VIOLATION A=AREA OF CONCERN

PERMITS - FACILITIES	V	A	CHIPPING AND GRINDING OPS AND FACILITIES	V	A	MAXIMUM METAL CONCENTRATIONS	V	A
PRC 44002 - OPERATOR AUTH BY SWF PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	17862.1(a) - CG: 200 TPD-EA NOTICE	<input type="checkbox"/>	<input type="checkbox"/>	17868.2 - METAL CONCENTRATION EXCEEDED	<input type="checkbox"/>	<input type="checkbox"/>
PRC 44004 - SIGNIFICANT CHANGE	<input type="checkbox"/>	<input type="checkbox"/>	17862.1(b) - CG: 200-500 TPD REG PRMT	<input type="checkbox"/>	<input type="checkbox"/>	<b>PATHOGEN REDUCTION</b>		
PRC 44005 - TRANSFER OWNERSHIP	<input type="checkbox"/>	<input type="checkbox"/>	17862.1(c) - CG: > 500 TPD FULL PRMT	<input type="checkbox"/>	<input type="checkbox"/>	17868.3(a) - PATHOGEN LEVELS EXCEEDED	<input type="checkbox"/>	<input type="checkbox"/>
PRC 44014(b) - OPER COMPLIES WITH TERMS	<input type="checkbox"/>	<input type="checkbox"/>	17862.1(d) - CG: CONTAM LIMIT SAMPLING	<input type="checkbox"/>	<input type="checkbox"/>	17868.3(b) - PATHOGEN LEVELS/TEMP MAINT	<input type="checkbox"/>	<input type="checkbox"/>
17210.3 - REQ FOR EMERGENCY WAIVER	<input type="checkbox"/>	<input type="checkbox"/>	17862.1(e) - CG: CONTAM LIMIT	<input type="checkbox"/>	<input type="checkbox"/>	17868.3(c) - ALT METHODS APPROVED	<input type="checkbox"/>	<input type="checkbox"/>
17211.3 REQ FOR TEMP STIP. AGREEMENT	<input type="checkbox"/>	<input type="checkbox"/>	17862.1(f) - CG: STORAGE LMT / EXCEEDED	<input type="checkbox"/>	<input type="checkbox"/>	17868.3(d) - TEMP MONITORING	<input type="checkbox"/>	<input type="checkbox"/>
17211.4 - ISSUING STIP AGREEMENT (PEP)	<input type="checkbox"/>	<input type="checkbox"/>	<b>SITING AND DESIGN</b>			<b>GENERAL MATERIAL PROCESSING</b>		
17854 - COMP MAT HAND FACILITY PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	17865(a) - CLOSED LANDFILLS (Post Close Use)	<input type="checkbox"/>	<input type="checkbox"/>	17868.5(a) - LOAD CHECKING/SORTING	<input type="checkbox"/>	<input type="checkbox"/>
17863 - REPORT OF COMP SITE INFO	<input type="checkbox"/>	<input type="checkbox"/>	17865(b) - INTERMED COVER (Foundation Stab)	<input type="checkbox"/>	<input type="checkbox"/>	17868.5(b) - PHYSICAL CONTAMINANTS	<input type="checkbox"/>	<input type="checkbox"/>
17863.4 - ODOR IMPACT MINIMIZATION PLAN	<input type="checkbox"/>	<input type="checkbox"/>	17866 - GENERAL DESIGN REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	17868.5(c) - AG OPER METAL CONCENT	<input type="checkbox"/>	<input type="checkbox"/>
18104 - REG PERMIT (Chipping & Grinding)	<input type="checkbox"/>	<input type="checkbox"/>	<b>GENERAL OPERATING STANDARDS</b>			17868.5(d) - PERSONNEL TRAIN (1% contains)	<input type="checkbox"/>	<input type="checkbox"/>
21640 - PERMIT REVIEW APPLICATION	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(1) - ANIMAL WASTE	<input type="checkbox"/>	<input type="checkbox"/>	17868.5(e) - RECORDS	<input type="checkbox"/>	<input type="checkbox"/>
<b>FILING REQUIREMENTS - OPERATIONS</b>			17867(a)(2) - VECT/DODRSLTHAZ/NUIS/NOIS/DST	<input type="checkbox"/>	<input type="checkbox"/>	<b>RECORD KEEPING</b>		
17863.4 - ODOR IMPACT MINIMIZATION PLAN	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(3) - RANDOM LOAD CHECKS	<input type="checkbox"/>	<input type="checkbox"/>	17869(a) - INSPECTION OF RECORDS	<input type="checkbox"/>	<input type="checkbox"/>
18103.1 - ENF AGENCY NOTIF FILED	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(4) - COMPOST CONTAMINATION	<input type="checkbox"/>	<input type="checkbox"/>	17869(b) - SPECIAL OCCURRENCES	<input type="checkbox"/>	<input type="checkbox"/>
<b>AGRICULTURAL MATERIAL COMPOSTING OPERATIONS</b>			17867(a)(5) - UNAUTHORIZED ACCESS	<input type="checkbox"/>	<input type="checkbox"/>	17869(c) - PUBLIC COMPLAINTS	<input type="checkbox"/>	<input type="checkbox"/>
17856(a) - AG COMP OPER - EA NOTIF ROMT	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(6) - TRAFFIC CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	17869(d) - FEE DSTOCK AND COMPOST	<input type="checkbox"/>	<input type="checkbox"/>
17856(b) - AG MAT COMP OP REQS/INSP FREQ	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(7) - SIGNS	<input type="checkbox"/>	<input type="checkbox"/>	17869(e) - LOAD CHECKS	<input type="checkbox"/>	<input type="checkbox"/>
17856(c) - SALE/GIVE > 1K CU YDS PER YEAR, <12,500 CUBIC YDS OF GREEN MAT ON-SITE	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(8) - FIRE PREV, PROT, CNTRL (temp)	<input type="checkbox"/>	<input type="checkbox"/>	17869(f) - ARTICLE 7 TEST RESULTS	<input type="checkbox"/>	<input type="checkbox"/>
<b>RESEARCH COMPOST OPERATIONS</b>			17867(a)(9) - PHONE OR RADIO COMM	<input type="checkbox"/>	<input type="checkbox"/>	17869(f)(1) - PATHOGEN REDUCTION MTHDS	<input type="checkbox"/>	<input type="checkbox"/>
17862(a) - MAXIMUM 5,000 CUBIC YDS ON SITE	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(10) - PHYS CONTAM, REFUSE REM	<input type="checkbox"/>	<input type="checkbox"/>	17869(g) - RECORD OF SERIOUS INJURIES	<input type="checkbox"/>	<input type="checkbox"/>
17862(b) - IN VESSEL-LEAVE APP > 5K CY	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(11) - ENCL ACTIVITIES VENTILATED	<input type="checkbox"/>	<input type="checkbox"/>	17869(h) - TRAINING RECORDS	<input type="checkbox"/>	<input type="checkbox"/>
17862(c) - DESC RESEARCH TIME FRAME	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(12) - LECHATE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	<b>SITE RESTORATION</b>		
17862(d) - EA NOTIFICATION RENEWAL-2 YRS	<input type="checkbox"/>	<input type="checkbox"/>	17867(a)(13) - PHYS CONT PREV. REMOVED	<input type="checkbox"/>	<input type="checkbox"/>	17870(a) - NTC 30 DAYS PRIOR RESTORATION	<input type="checkbox"/>	<input type="checkbox"/>
			17867(a)(14) - SITE ATTENDANT	<input type="checkbox"/>	<input type="checkbox"/>	17870(b) - PROTECT PUB HLTH, SAFETY, ENVIR	<input type="checkbox"/>	<input type="checkbox"/>
			17867.5 - PERSONNEL TRAINING	<input type="checkbox"/>	<input type="checkbox"/>	17870(c) - RESTORATION PROC PERFORMED	<input type="checkbox"/>	<input type="checkbox"/>
			<b>SAMPLING REQUIREMENTS (OPERATIONS THAT SELL OR GIVE AWAY &gt; 1,000 CUBIC YARDS AND ALL FACILITIES)</b>			<b>OTHER</b>		
			17868.1 SAMPLING REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Comments: (Note: for additional or continued comments use the CIWMB 03 or attach additional pages.)



Questions?  
Comments?

For more information, visit:

[http://www.calrecycle.ca.gov/swfacilities/  
Compostables/AnaerobicDig/default.htm](http://www.calrecycle.ca.gov/swfacilities/Compostables/AnaerobicDig/default.htm)