

17th Technical Training Series



April 3-6, 2017 · Long Beach Hyatt
200 South Pine Avenue · Long Beach, California, 90802



Using Research Tools to Prepare for Inspections, Report Writing and Enforcement



Where we are:

- 1) EA Notifications, i.e. composters, chip & grind sites
- 2) Unpermitted facilities via LEA findings/complaints/referrals

Old form

New Updated Information Change in mailing address/telephone Request to Archive

CIWMB USE ONLY = Facility/Site/Operation SWIS Number: 50-AA- [redacted]

FACILITY INFORMATION

Facility/Site Name: [redacted] Agricultural Grindings, Inc

Facility/Site Address/Location: [redacted] Rd.

City: Oakdale County: Stanislaus State: CA Zip: [redacted] ✓

Facility Locator Information: Longitude: [redacted] Latitude: 37.72475

Latitude/Longitude Source: External GPS Map

Map #: [redacted] Section: [redacted] Township: [redacted] Range: [redacted] Base/Meridian: [redacted]

OPERATOR (Business Owner) DATA

Person/Operator Name/Company Name: [redacted]

Mr./Ms.: Mr. Last Name: [redacted] First Name: [redacted] MI: [redacted]

Title: Operator/Owner Organization: [redacted]

Mailing Address: 5 [redacted] Rd

City: Oakdale State: CA Zip: 95361

Telephone Number: [redacted] FAX Number: [redacted] 795

LAND OWNER (Property Owner) DATA

Person/Operator Name/Company Name: [redacted] (60-50 Partnership)

Mr./Ms.: Last Name: [redacted] First Name: [redacted] MI: [redacted]

Title: Co-Owners Organization: [redacted]

Mailing Address: (same as operator)

City: [redacted] State: [redacted] Zip: [redacted]

Telephone Number: [redacted] FAX Number: [redacted]

Signature: [redacted] Date: 5/01/03

(LEA/Operator/Owner/CIWMB Staff)

FACILITY/SITE UNIT CHARACTERISTICS/SPECIFICATIONS

Permit Status:	Operator:	Operational Status:	Unit Activity(s):
<input type="checkbox"/> Permitted	<input type="checkbox"/> Federal	<input type="checkbox"/> Planned	(see back of this page for a list of the Activity Codes and list one or more Activity Code(s) above)
<input type="checkbox"/> Unpermitted	<input type="checkbox"/> State	<input checked="" type="checkbox"/> Active	Inspection Frequency: Quarterly
<input type="checkbox"/> Exempt	<input type="checkbox"/> County	<input type="checkbox"/> Inactive	Closure Year: [redacted]
<input checked="" type="checkbox"/> Notification	<input type="checkbox"/> City	<input type="checkbox"/> Closed	Tons/Volume per Day: 350 gds/day
<input type="checkbox"/> Excluded	<input checked="" type="checkbox"/> Private	<input type="checkbox"/> Clean Closed	Permit Date: [redacted]
<input type="checkbox"/> Proposed	<input type="checkbox"/> District	<input type="checkbox"/> To Be Determined	EA Notification Date: 4/29/03

List one or more Types of Waste to be received/permited (see back of this page for a list of the Waste Codes): B, 10

Form Submitted by (CIWMB Staff):

From Wood Ward

New form

ENFORCEMENT AGENCY NOTIFICATION

Enforcement Agency: CalRecycle	Official Use Only
APN-062-025-012	SWIS Number: [REDACTED]
County: Stanislaus	Date Received:

I. GENERAL INFORMATION					
Operation Name:	[REDACTED]	Bedding			
Address:	59 [REDACTED] Ranch Rd	City:	[REDACTED]	State:	Ca Zip: 95361
Phone:	209 [REDACTED] 89	Fax:	209 [REDACTED] 53		
Operator Name:	Tom [REDACTED]				
Address:	PO Box 1 [REDACTED]	City:	Riverbank	State:	Ca Zip: [REDACTED]
Phone:	209 [REDACTED] 89	Fax:	209 [REDACTED] 53		
Land Owner:	JA [REDACTED]				
Address:	98 [REDACTED] River Road	City:	Oakdale	State:	Ca Zip: 95361
Phone:	209-614-3889	Fax:	20 [REDACTED] 53		

II. OPERATION INFORMATION					
Authorizing Eligibility (State Section of 14 CCR Division 7, Chapter 3 or 3.1): See back for more details	17857.1				
Type(s) of Waste/Material Handled:	Green material including yard waste, tree waste, and wood waste				
Volume of Waste/Material Handled:	5000-9000 cubic yds/mo				
Peak Loading:	12,500 cyd	<input checked="" type="checkbox"/> Cubic Yards or <input type="checkbox"/> Tons	Annual Loading:	95,000 cyd	<input checked="" type="checkbox"/> Cubic Yards or <input type="checkbox"/> Tons
Days and Hours of Operation:	7am - 5pm Monday - Friday; 7am - 12pm Saturday. Closed Sunday		Operation Acreage:	6 ac	
Brief Description of the Operation:	[REDACTED] Ranch takes in green waste from tree trimmers and Government Agencies. The facility is not open to the public, all haulers must have an access key card to enter the site. Once the material is collected, it is ground for use in livestock bedding and/or compost feedstock. Material sent offsite is composted at a separate facility. The facility may operate less hours than described in Days and Hours of Operation. The facility also operates under a recycling permit granted by Stanislaus County Dept. of Environmental Resources.				

III. DOCUMENTATION OF LOCAL NOTIFICATION (check one and submit with EA Notification)	
<input type="checkbox"/>	Proof of Compliance with the California Environmental Quality Act (CEQA).
<input type="checkbox"/>	Correspondence from the local planning department that compliance with CEQA is not required for the operation to obtain local land use approval.
<input checked="" type="checkbox"/>	Written notice to the local planning department of the operator's intent to commence operations.

IV. OWNER/OPERATOR CERTIFICATION	
I hereby certify under penalty of perjury that the information provided is true and accurate to the best of my knowledge and belief.	
Signature of Land Owner:	[Signature] Date: 9.28.15
Signature of Operator:	[Signature] Date: 9/28/15

* Completion of this form is not required by regulation; however, it will provide the enforcement agency with the information required by 14 CCR 18103.1
• A separate Notification is required for each eligible operation.



Objective: Drafting a detailed and accurate inspection report that will satisfy legal scrutiny

Key: Use a methodology for preparing to inspect

Benefit: These Standard Operating Procedures become your inspector DNA

Be a Scientist!

What is the regulatory landscape?



Permitted

- ▶ Compliance history?
- ▶ Appropriate permit tier?
- ▶ Upgrade to Registration permit?
- ▶ What does the Notification say?
- ▶ Receptors like houses, waterways and roads?

Unpermitted

- ▶ May require covert surveillance
- ▶ Creative investigations
- ▶ Cyber apps like Google Earth
- ▶ Government search engines like Accurint or CLEAR accessible through management
- ▶ Local permits like CUP, APN number, zoning issues
- ▶ Receptors

Key Components of Notification:

- ▶ Owner/operator info
- ▶ Hours of operations
- ▶ Type(s) of material
- ▶ Maximum daily/annual volume for storage
- ▶ How many employees
- ▶ Equipment



Odor Impact Minimization Plan (OIMP)

- ▶ Enforceable document with important metrics:
 - ❑ Receptors
 - ❑ Local climatic conditions
 - ❑ Detailed ops
 - ❑ Complaint response protocol
 - ❑ Procedures for odor minimization



Aggregate your Data to Understand your Facility (What is their focus?? How do they fit in to the Tier?)

WHAT type of material(s) are they using? What type of business?

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/FacilityType/Compost/default.htm>

What is the Regulatory Tier Placement for Compostable Material Handling Facilities or Operations?

The following resources are available to help determine which permit tier is appropriate for each type of site:

→ [Permit Tier Placement Chart](#)

Excluded Tier	Enforcement Agency Notification Tier	Registration Permit Tier	Full Solid Waste Facility Permit
Refer to 14 CCR §17855	Agricultural Material Composting Operations (all) 14 CCR §17856		Composting Facilities (all) (e.g. biosolids, digestate, food material, mixed material) 14 CCR §17854
	Green Material Composting Operations (<12,500 yd3) 14 CCR §17857.1(a)	Vegetative Food Material Composting Facilities (<12,500 yd3) 14 CCR §17857.2	Green Material Composting Facilities (>12,500 yd3) 14 CCR §17857.1(c)
	Biosolids Composting Operations at POTWs (all) 14 CCR §17859.1		Vegetative Food Material Composting Facilities (>12,500 yd3) 14 CCR §17857.2
	Research Composting Operations (≤5,000 yd3) (Within-vessel >5,000 yd3 with EA determination) 14 CCR §17862		
	Chipping and Grinding Operations (≤200 tpd) 14 CCR §17862.1(a)	Chipping and Grinding Facilities (≥200 tpd and ≤500 tpd) 14 CCR §17862.1(b)	Chipping and Grinding Facilities (>500 tpd) 14 CCR §17862.1(c)

Compost vs. Chip & Grind

Compost

- ▶ Equipment needs, i.e. Trommel screens, front loaders (Dust control? APCD stickers?)
- ▶ 17868.1 - Sampling Requirements
- ▶ 17868.2 - Maximum Metals Concentrations
- ▶ 17868.3 - Pathogen Reduction

Chip & Grind

- ▶ Is the material cooking? (Above 122 degrees)
- ▶ Are they permitted to compost?



Now you have your data in your toolbox.
What's next?

Equipment:

- ▶ PPE
- ▶ Camera
- ▶ Regs, regs...did somebody say REGS?
- ▶ Smartphone
- ▶ Measuring wheel
- ▶ Calibrated compost temp probe



Born to INSPECT!

