





COMPOSTING as a RECYCLING STRATEGY

Trends and Status in Commercial Composting

H-GAC Regional Recycling Roundtable NOVEMBER 15, 2018 | PRESENTATION



Composting as a Recycling Strategy





Per TCEQ there are 106 Authorized Facilities in Texas

- **0** Exempt Facilities
- 87 Notification
 - 8 Permitted
- 11 Registered



48 Texas Compost Facilities participate in the USCC Seal

of Testing
Assurance
Program (STA)

Data as of 11.01.2018





Commercial Composting in Texas: Policies, Procedures

Where the Rules Begin: Title30, Texas Administrative Code - Chapter 330 → 332

Section 330.1(d) – This Chapter does not apply to any person that composts MSW in accordance with Chapter 332 unless a Permit is required **Chapter 332** – Applies to persons who compost or mulch. Chapter 330 does not apply . . . Unless a Permit is required

TCEQ Authorizations Types for Compost Facilities

- ✓ Exempt
- ✓ Notified
- ✓ Registered
- **✓** Permitted







Exempt Authorization

Notice of Intent to Operate a Recycling Facility

		<u>-</u>	<u>-</u>		
Feedstock Material	Notice Requirements	Public Participation?	Subject to Recycling and Compost Rules?	End Product Testing	Approximate Timeframe to Complete Review Process
source separated; yard trimmings; clean wood material; vegetative material; Paper; and Manure	To TCEQ's MSW Permits Section	None	Yes: General Requirements (Section 332.4); Air Quality Requirements [(Section 332.8(b)]; Storage Limitations (Section 328.4); Reporting and Recordkeeping (Section 328.5)	None	60-90 days TCEQ



Exempt Authorization

Notice of Intent to Operate a Recycling Facility

Form TCEQ-20049 Attachments:

- A. Map of Site Location
- B. Description of Operation Compost or Mulch (Option 2,3,4)
- C. End Use for Finished Product
- D. Closure Cost Estimate/Financial Assurance. Section 328.4(c) through (e)
- E. Alternative Compliance Demo Sections 328.4 (c), (e),(f)
- F. Bexar County Section 328.4 (g)





Compost Notification Notice of Intent to Operate a Compost Facility

Section 332.32(c) and Chapter 332, Subchapter B

Feedstock Material	Notice Requirements	Public Participation?	Subject to Recycling and Compost Rules?	End Product Testing	Approximate Timeframe to Complete Review Process
Exempt material plus: source separated; Meat Fish Dead Animals Dairy Material Meat/Vegetable Oils and Greases NOT FOG from Grease trap / interceptors	Mailed Notice to Adjacent Land Owners via TCEQ's MSW Permit Section and OCC Tags. Force Grape Critics Trans & Toper Section Trans & To	Limited to Adjacent Land Owners via letter correspondence: No Motion to Overturn; No Public Meetings; No Public Hearing available	Yes: General Requirements (Section 332.4); Air Quality Requirements [(Section 332.8(c)]; Storage Limitations (Section 328.4); Reporting and Recordkeeping (Section 328.5) Plus some operational requirements (Section 332.23)	No	60-120 days TCEQ



Compost Registration

Section 332.32(b), Chapter 332, Subchapter C & Sub G

Feedstock Material	Notice Requirements	Public Participation?	Subject to Recycling and Compost Rules?	End Product Testing	Approximate Timeframe to Complete Review Process
Exempt material plus: Compost Notification Material Plus: Municipal Sewage Sludge Disposable diapers Paper Sludges	Mailed Notice to Adjacent Land Owners via TCEQ's MSW Permit Section and OCC Published Notice	Opportunity for Public Meetings (Published and Mailed) Opportunity for Motion to Overturn ED Decision (mailed)	No to Recycling Yes to Compost: General Requirements (Section 332.4); Air Quality Requirements [(Section 332.8(c)]; Operational requirements (Section 332.27); plus Soil Liner Required	Yes Sludge = Chapter 312 and 332.72(d)(2) (A) and (D) No Sludge = 332.71 and 332.72	6-12 months Admin and Tech TCEQ
				- Afterior	



Compost Permit

Chapter 332, Subchapters D, E, F, and G & Applicable Portions of Chapter 330



Feedstocks that Trigger a Permit:

- Grease Trap Waste
- Mixed Municipal Solid Waste







Compost Permit

Chapter 330: Section 330.1(d) Chapter 332, Subchapter D, E, F and G; Section 332.3(a)

Feedstock Material	Notice Requirements	Public Participation?	Subject to Recycling and Compost Rules?	End Product Testing	Approximate Timeframe to Complete Review Process
Exempt material Plus: Compost Notification Material Plus: Mixed MSW Waste Grease Trap Waste	Mailed Notice to Adjacent Land Owners via TCEQ's MSW Permit Section and OCC Published Notice	Opportunity for Public Meetings (Published and Mailed) Opportunity for Motion to Overturn ED Decision (mailed) Opportunity for Contested Case Hearing	No to Recycling Yes to Compost: General Requirements (Section 332.4); Air Quality Requirements [(Section 332.8(e)]; Operational requirements (Section 332.45); plus Soil Liner Required Groundwater Monitoring Required	Yes Sludge = Chapter 312 and 332.72(d)(2) (A) and (D) No Sludge = 332.71 and 332.72	9-18 months TCEQ



What's Going on in





What's Going on in Texas

 Low landfill tipping fees result in a very small amount of postconsumer food waste currently being recycled.

 Post-consumer food waste is often contaminated, resulting in higher processing costs.

 Food waste produces very little product to sell.





First City in Texas to implement Curbside Organics Collection program to include Food scraps, Meat

- Pilot Program Implemented 2011-2012
 - 30,000 residents receive 96-gallon green cart
 - \$1.3 million cost to provide carts for pilot program
 - Transition to subscription service completed March 2013



City of San Antonio

- Transition from Subscription to City Wide Residential Service 2015
 - Rolled out October 2015 alongside PAYT initiative
 - Service approximately 360,000 residents; Billed according to Cart size
 - · Green Cart: Yard trimmings, Food Scraps, Soiled Paper

SOLID WASTE SERVICE MONTHLY RATES

PAYT	SMALL	MEDIUM	LARGE
Solid Waste Fee	\$16.76	\$18.76	\$26.76
Environmental Fee	\$2.24	\$2.24	\$2.24
Total City Services	\$19.00	\$21.00	\$29.00

OTHER FEES

These fees are collected through the CPS Energy electric bill (City Services)

ITEM	FEE	
Blue Cart Contamination Fee	\$25.00	
Extra Garbage Collection Fee	\$10.00	

City offers Brush collection 2 x year

Leaf collection 2 x year

Residential call in service (311)

Contamination

- Pro: Easy to spot contamination Challenge: Manual Sorting Process
- Loads are rejected if more than 10% non-program material
- Rejection Rate FY2018 around 25%



Residential Brush Program - Collected 6 x Year

- City utilizes five of Contractors conveniently located brush recycling facilities, minimizing trucking costs
- 381,874 tons brush diverted and recycled for beneficial use (April 2009 October 2018)

Residential Yard Trimmings - Collected Weekly

- Leaves, grass clippings are collected in ASTM D6400 approved Compostable bags (supplied by residents) Small bundled twigs
- Material is so clean, Contractor pays City for the yard trimmings
- 129,072 tons yard trimmings diverted and composted (April 2009 – October 2018)

Food Waste Diversion

 H-GAC Study: Commercial Food Waste Collection in the H-GAC Planning Region August 2015

 $\underline{https://www.h-gac.com/community/recycling/documents/CommercialFoodWasteCollectionStudy2015.pdf}$







Residential Curbside Organics Collection Pilot to Permanent

- 1st Phase ended 2013
 - Yard Trimmings made up 89.5%; Food Scraps 2.4%
- 2nd Phase initiated in 2014 (14,000+ homes served)
 - Results reported January 2015
- Backyard Composting Education & Incentive Program
- First Major Expansion of Program September 2017
 - Carts delivered to approx. 38,000 homes
- Second Major Expansion of Program June 2018
 - Carts delivered to approx. 38,000 homes

Currently there are about 90,000 homes on the program

- Planning to continue expansion through 2020 (two more phases)
- Curbside compost program contamination rate: About 2%

OF AUSON DED 1839

https://austintexas.gov/austincomposts

Universal Recycling Ordinance (URO) Phase 1

- Requires all multifamily buildings, office buildings, institutional properties in the City to recycle
- Fully implemented by October 1, 2017

URO Phase 2

- Expands to all remaining properties in Austin including retail centers, and includes food permit holders to divert organic material. Timeline was moved to 2018 for full implementation
 - City will incentive early adopters to offset their start up costs up to \$1,800



Green Curb Cart Program - \$3.00/month

- Accepted Materials
 - Grass Clippings
 - Wood, Limbs, Leaves
 - Kitchen Food Waste
 - Paper products
 - Milk and Juice Cartons
 - Phone Books









FOOD WASTE

Facility also processes:

- Agricultural
- Horse Manure

Commercial

- Landscape trimmings (Leaves, Grass)
- Brush & Branches
- Clean Wood (chips, sawdust, lumber)

Free Compost Events for Residents. Wichita Falls Landfill.



Residential Brush Collection Program Every 4-6 weeks

Compost Facility Receives Wastes from:

- Residential Yard trimmings
- Commercial Brush, Clean Wood
- Industrial (e.g., food processors)

Materials Accepted for Composting

- Food Waste & Compostable Products
 - Fruits, Vegetables, Trimmings, Paper, Corrugated
- Yard Trimmings
 - Leaves, Grass Clippings
 - Logs & Stumps; Brush & Branches
 - Clean Wood (chips, sawdust, lumber)



Save the Greens Program

City Owned and Operated compost facility. Program is operated by the Department of Public Works.



How the Commercial Compost Industry is Developing

Growth in Municipal Green Waste Diversion Ban of Organics in Landfills



States that Ban Organics or Mandate Organics Recycling - October, 2014



Ban/mandate some yard debris: Arkansas*, Delaware, Florida*, Georgia*, Illinois, Indiana, Iowa, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nebraska*, New Hampshire, New Jersey, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, South Dakota, Vermont, West Virginia, Wisconsin

*Allow yard debris disposal in landfills that generate energy

Ban/mandate food scraps: California, Connecticut,
Massachusetts, Rhode Island, Vermont.
Also of note: New York City, Seattle

Source: Haaren, Themelis and Goldstein, State of Garbage in America, BioCycle Magazine, Oct 2010, updated 5-2011, 3-2012, 4-2013, 6-2014, 10-2014



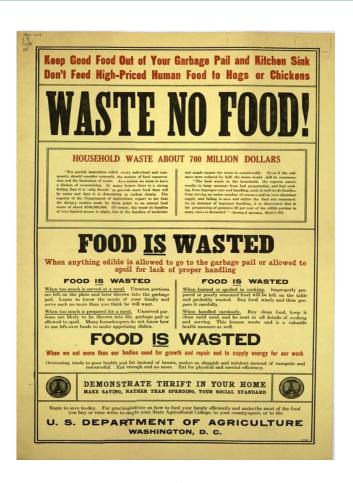
How the Compost Industry is Developing

Compostable 'Plastics' & Other Products



Check with Compost facility for Acceptance

Food Discards





Compost Industry Challenge – Closing Infrastructure Gaps

Challenges

- Premium Cost for Service
- Route Density Challenges
- Proximity to Processors





Solutions Data Base & GIS Mapping to Connect Generators, Haulers, Processors

*Source: Houston-Galveston Area Council



Living Earth's Take:

New Entrepreneur Opportunities and Areas of Future Focus











Resources:

- **✓ Composting Topics:**
 - http://www.tceq.texas.gov/p2/nav/composting.html
- ✓ https://compostingcouncil.org/blog/resources/best-management-practices-bmps-for-incorporating-food-residuals-into-existing-yard-waste-composting-operations-2/



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