



Cedar Grove Composting Comments on Public Draft CAR

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<http://www.climateactionreserve.org/how/protocols/in-progress/composting/>

Thank you for the opportunity to comment on the Composting Protocol.

Section 2.2

2. Foodwaste Handling BMP Requirement

Add to definition, **“unless in a control environment”**

Many facilities have receiving buildings under negative air that vent to a biofilter thus preventing methane escape.

According to Section 4 -SSR 6 it appears the process starts by premixing material and thus would have entered the processed but not actually on the active compost pad. Thus would premixing count as in process?

Section 3.4.1 The Performance Standard Test

Food Soiled Paper Waste:

It appears that this definition would include compostable packaging as long as the product had paper content in it. So PLA coated paper cups would count but PLA only cups that had no paper would not count. Cardboard is excluded under 5.1.1.2.2 but pizza boxes are included here?

Section 3.4.2.1 Guidance on Solid Organic Waste Regulations.

This section is being removed.

Section 3.5 Regulatory Compliance

Project must attest to being in material compliance with all applicable laws relevant to the project activity (e.g. Water Quality, Wastewater discharge safety etc.)
What does material compliance mean ? and how does it relate to air emissions. Notices of violation should not affect the facility ability to get credit unless that violation directly reduces methane avoidance activity.

Table 5.2 Forced Aeration Systems

This section is very generic and really only covers two types of systems. There are many more in-vessel and synthetic covered systems that operate actually better than these two categories with respect to GHG reduction. Rather than try to list all the current systems or contemplate new systems coming on line. A statement needs to be made that :

“Variations of these systems can also be included at the rated values and when evidence is available may increase the offset credits.”

6.3.1 Time, Temperature, and Turning Frequency BMP Monitoring

This section is problematic in that measuring for oxygen is not considered in addition to temperature or allows only oxygen instead of temperature monitoring. The entire point of GHG emission is proving aerobic conditions but the BMP never uses oxygen as a monitored factor. We would suggest stating that temperature profile or oxygen monitoring above 8% on a daily basis in the same time frame outlined for temperature would be more consistent with the goal.

Sampling measurement per volume should also be amended to allow that other sampling volumes are acceptable were a system, usually in-vessel, can demonstrate through studies less sampling is still indicative of temperature or oxygen throughout the pile.

There is a disconnect between 6.3.1 Temperature and 6.4.1 Monitoring

Temperature in section 6.3.1 says monitor temperature after 55 C until the temperature falls below 50 C. Where as section 6.4.1 Positive ASP System: for the first 2 weeks of active compost cycle. Most systems take a few days to heat to above 55 C but then may take 30 days to drop below 50 C. This issue causes a conflict between Section 2.2 where Force Aeration Systems only needs to be above 55 C for 3 days.

This section also does not assume Positive ASP System could have a synthetic cover as opposed to a finished compost cover.

6.4.2 Monitoring Requirements for Documenting Use of Biofilter Exhaust Gas Control Systems

Excellent addition, since biofilters can be run very poorly and in fact are a very difficult system to maintain at even close to optimum. It is very common for these system to run anywhere from 40 % to 85 % efficient thus not really treating the compounds they are suppose to control. In addition, drastic changes can occur in less that a 24 hours within these control units.

The elements recorded are very important as outlined.

- The type of material or material mixture used as the biofilter media
- The area and depth of the biofilter media
- The ventilation rate of the designed system
- The designed retention time of the exhaust gas in the biofilter media

In addition to those listed, moisture content should be measured to show the filter is working properly, too little moisture no scrubbing action, too much moisture air can not move through the media.

The other issue is the destruction efficiency of these filters is only part of the story the bigger issue sometimes is the capture efficiency. If the fans are too small they are not pulling air out of the pile therefore poor capture. So even if the filter is working well, the system is not capturing any air to be treated in the biofilter.