



June 3, 2011

Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014
213-891-1444

Re: Comments regarding revisions to the Organic Waste Digestion Protocol

Thank you for the opportunity to provide comments for this revision to the Organic Waste Digestion Protocol. These comments pertain to the issue of how to deal with eligibility of grocery store waste streams, and they apply equally to the OWD Protocol and the OWC protocol.

The OWD Protocol states:

"Depending on the operational design of the OWD project, the project might accept non-source separated MSW streams (mixed MSW) and/or Source Separated Organics (SSO) streams."

These comments pertain to those OWD projects that use mixed MSW as a feedstock.

The OWD Protocol also states:

"The Reserve's performance standard research indicates that approximately 2.5% of the MSW food waste generated in the U.S. is diverted from landfills annually as common practice, and that this is limited mostly to MSW food waste from grocery stores and supermarket diversion programs. Therefore, MSW food waste and soiled paper waste streams are not eligible if they are sourced from grocery stores and/or supermarkets that have historically diverted these waste streams from landfills."

Likely feedstocks for anaerobic digestion facilities are the fines from mixed MSW streams that pass through a material recovery facility (MRF), or from a sorting facility used to remove inorganic contaminants prior to digestion. This is the "black bin" waste that remains after recyclables have been separated.

Because of the way that collection vehicles and waste containers function together, routes are often divided into residential and commercial/multi-family. As written, an OWD project would

have to research every commercial/multi-family route of every hauling company that delivered waste to the OWD project, or to a separate MRF or transfer station from which feedstock is sourced, to determine the amount of grocery store waste that was included in the overall mixed waste stream. The estimates would generally be made by assuming that the bin at a grocery store was completely full every time it was picked up because individual bins at grocery stores are not weighed when mixed waste is collected. Bear in mind that the OWD project is likely to receive waste from a variety of different hauling companies that have no obligation at all to provide that information to the OWD project. In fact, there are a number of reasons that a third party hauler would refuse to divulge that information. In other instances, if the feedstock is fines from a MRF, for instance, then the OWD project is not receiving feedstock from the original hauler but from another hauler transporting the MRF residuals. Tracking down this information is extremely time consuming, if possible at all.

Bear in mind also that, as stated in the OWD protocol, many grocery stores already have programs in place to provide source-separated food waste to composters. Therefore, food waste has very often already been separated from the mixed waste prior to placement in the bin. Therefore, an OWD project using mixed MSW would have to conservatively estimate the amount of grocery store waste (to the satisfaction of a verifier) so that it can be subtracted off of the top of the waste received when, oftentimes, there is no food waste in the grocery store waste collected as mixed MSW.

Approaching each individual grocery store on the collection routes to determine their current and historical management practices for food waste is not only extremely onerous, assuming the data was even provided to determine their locations, but they are generally not direct clients of the OWD project, but rather two or three steps removed, and it just isn't feasible. It seems that the OWD protocol generally assumes that grocery store waste would be source-separated with an agreement between the OWD project and the grocery store. This is generally not the case.

One alternative would be to drop the requirement for grocery store documentation if the feedstock is mixed MSW. If this is not considered conservative enough, then a simple reduction in feedstock tonnages from routes that include grocery stores of 2.5% to account for the possibility of grocery store waste in the mixed MSW is another possible option in lieu of tracking down individual grocery store data.

Thank-you for your consideration,

A handwritten signature in cursive script that reads "Richard J. Moore". The signature is written in dark ink and is positioned below the typed name.

Rick Moore