

Organics Recycling Facility Inspection Guidance

This guidance document was developed by the Statewide Organics Management (SOM) workgroup¹. Our goal is to support the existing solid waste infrastructure and to encourage expansion of that system to meet the critical recycling and waste handling needs of the future of Washington State.

Maintaining productive relationships among all parties in regulatory interactions can further this goal. Regulators and operators may have many inherently different priorities, but share the same objective – that the solid waste facilities are operated well so that public health, safety and the environment are not harmed by individual operations – which may give the entire industry a bad name.

We have generated these few guidelines, hoping that they will be considered ‘common sense’ and that attention to a few points of safety and etiquette will help to maintain the sustainability of our waste processing system.

For Both Agency Representatives and Facility Representatives

1. Be honest and respectful.
2. Establish relationships. It is far easier to work through issues if you have laid the ground work by getting to know and understand each other.
3. Assume constructive intent. This is especially important when first forming your relationship. Giving each other the benefit of the doubt will go a long way toward building a strong partnership for your mutual benefit.

For Regulatory Agency Representatives doing Facility Inspections:

1. Always check in at the office or operations shack upon first arriving at a private business site to alert the operator of your presence. Display your agency credentials and seek a facility escort. Do not wander around a facility by yourself without proper announcement.
2. Always have proper personal protective equipment when you are inspecting facilities. Closed toe shoes, traffic vest or safety colored coat or shirt, hard hat, and eye protection are a minimum. Your PPE should be equal or greater to that of workers on the site.
3. For safety, never walk in front of or behind operating equipment until the operator makes eye contact and waves you by. Assuming that they know that you are there could lead to industrial accidents. Try not to walk around alone. If you are accompanied by a facility escort, stay close to them while moving about the facility, because they know best how to stay safe during your time on site.

For Facility Operators and Representatives:

1. Agencies may need to make unannounced visits, please make time for them if possible. They may need to see your operation in normal (unannounced) operating mode so that they can get a realistic and objective view of your daily operation. This is not meant to burden or entrap you, and it does not necessarily mean that the regulator suspects any problems.
2. Instruct staff that inspectors are there legitimately. Staff should assist with the inspection as asked, not hinder or attempt to shorten the inspection. Inspections can be useful for exchanging information on how to stay within the rules. Try to get the most out of these inspections!

¹ Group members include representatives from compost facilities, haulers, consulting firms, and state and local air, health and solid waste departments.

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For Regulatory Agency Representatives doing Facility Inspections -continued:

4. If you see something out of compliance with the regulations, communicate this to the operator at the time. Choose your words carefully, and be mindful of your tone, as this can be a stressful interaction for facility personnel. Sometimes, there may be an issue you need to do more research on. You can let the operator know that you will get back to them on a specific item when you have had time to complete your research. Don't give the operator the false sense that they are doing just fine, and then surprise them by mail with a notice of violation.
5. Visit frequently enough, if possible, that you learn about the facility and how it operates during different times of the day, season, weather conditions, etc.
6. Facility operators will be more receptive to your input if you've made the effort to learn about their industry and are comfortable that you understand the concepts.
7. Do your site inspections with an open mind, and a solution-focused outlook. This is a business that they have invested significant resources in and your inspection is part of their ticket to success. Facilities want to be in compliance, you can help them recognize and achieve this.
8. All regulators should take the Compost Facility Operator's Training and other background trainings to maximize your understanding of the composting facility you will be regulating.

For Facility Operators and Representatives - continued:

3. If an inspector finds something amiss, resist the urge to react defensively. Try to adopt an attitude of collaboration and curiosity. Work with the inspector to get simple things corrected on the spot, and discuss potential timeframes for getting bigger items corrected. If something is corrected at the time of visit, ask the inspector to put the observation (and correction) in their report.
4. If an inspector observes something they believe is out of compliance, but you believe is legitimately allowed, explain your system to them with patience. Sometimes clarification is all that is needed.
5. You are the expert on your facility, and the more you can educate regulators about different ways to achieve desired outcomes, the stronger your partnership will be. Teach or explain to the inspector as best you can how your facility operates. If you don't have time during an unannounced inspection, offer to schedule a tour or meeting to go into more detail. Inspectors hear a lot of anti-government rhetoric, and are aware that you have a business to run, so may not ask because they are cautious about requesting more of your time.
6. Establish a relationship with your regulator. They can help you to stay in compliance if they know what is happening with your facility – including the challenges. They can help you to run an environmentally safe operation and to minimize complaints and liability on the part of your operation with respect to neighbors, and customers.
7. Operators should take the Compost Facility Operator's Training and other background trainings to maximize your understanding of the composting industry and regulatory framework in which you operate.