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Does the WA Dept. of Ecology cite a specific analytical test method for the testing of feedstocks for physical contaminants? I have reviewed the draft language for information about test methods. I did not locate any specific references to analytical test methods. I feel that citing an established test method is important for the test results to have meaning. Without a formal test method, how do we know what a reasonable sample size or detection limit is (or might be if statistical analyses have yet to be performed). What if it turns out that to characterize 3000 yards of material, a sample size of one cubic yard is required to achieve a detection limit of 2% by volume. Such a sample size is impractical, if not impossible, for most labs to process. Without statistical validation of an established test method, test results offer neither the regulator authority to take action nor the compost producer the ability to do their due diligence. As a compost analyst, I am concerned about my ability to provide all stakeholders with meaningful and useful analytical test results. If the updated regulation does not include language specific to the test methods required, how does anyone know if the available test methods (if any exist for physical contaminants in feedstock) apply to the regulation?

If no laboratory-based method exists for physical contaminants in feedstock, then I recommend creating a test method that can be conducted in the field on large volumes of material. Based on my experience testing compost feedstocks, it is highly unlikely that the typical sample volume (one gallon) will be representative of relatively large volumes of material when testing for physical contaminants.