

## CONSULTATION DRAFT

# Alberta Landfill and Composting Facility Operator Certification Guideline

**This consultation will be open for comment from  
July 1 until September 30, 2009.**

The consultation draft will replace the "Municipal Waste Management Facility Operator Certification Guidelines" effective January 1, 2010. Availability of the consultation document at ([http://www3.gov.ab.ca/env/waste/municipal\\_waste.html](http://www3.gov.ab.ca/env/waste/municipal_waste.html)) will be limited to the consultation period.

**Please submit your comments via email, fax or by mail to:**

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**Government  
of Alberta** ■

## FORWARD

Alberta Environment is updating its waste management regulatory framework. The Waste Control Regulation, Alberta User Guide for Waste Managers, Standards for Landfills and Standards for Composting Facilities are under review.

The Municipal Waste Management Facility Operator Certification program is being revised in conjunction with the updates to Alberta Environment's waste regulatory framework. The revised program involves industry associations as the certifying partner. Alberta Environment will no longer administer certification exams and issue certificates. The certifying partners will take on the role of providing training programs, administering exams, and certificate issuance. The consolidation of the certification components will greatly enhance program delivery. The Northern Lights Chapter of the Solid Waste Association of North America (SWANA-NLC) and the Composting Council of Canada (CCC) will be the certifying partners representing the landfill industry and composting industry, respectively. Both organizations currently have training programs in place, and have membership subscriptions from throughout Alberta and nationwide.

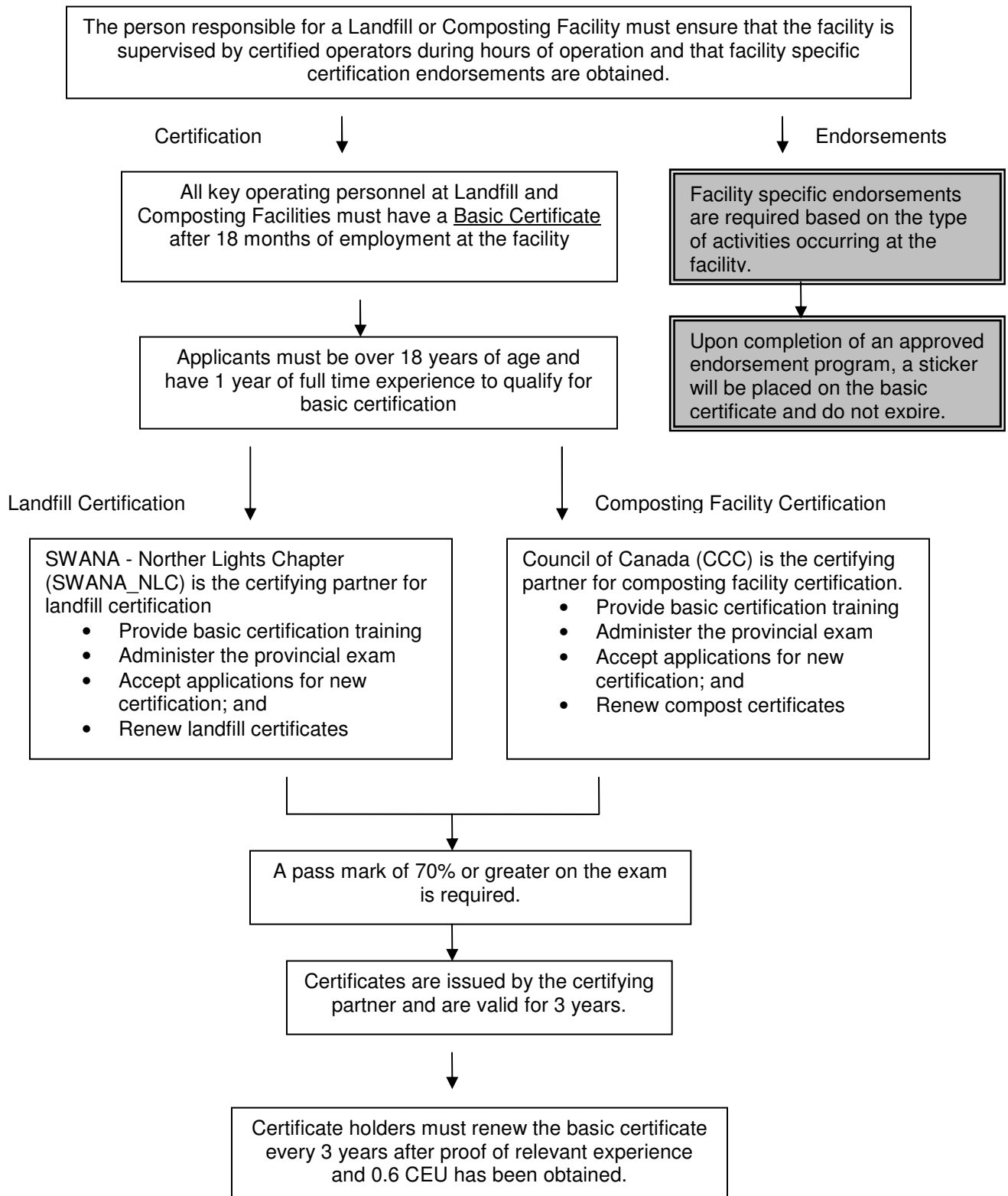
The new certification program is renamed the "Alberta Landfill and Composting Facility Operator Certification Program". The Solid Waste Certification Advisory Committee (SWCAC), chaired by Alberta Environment, will continue to govern the program by making recommendations on program requirements, exam bank updates, auditing certifying partner programs, and other matters that are integral to the certification program.

Alberta Environment acknowledges, with gratitude, the guidance and direction provided by the current members of the SWCAC in development of the new "Alberta Landfill and Composting Facility Operator Certification Program" and this guidance document. The members willingly participated in the process by volunteering their time to attend meetings and review documents.

### **Solid Waste Certification Advisory Committee Members (2009):**

Abimbola Abiola	-	Olds College
Dennis Bergheim	-	Evergreen Regional Waste Mgmt Services Commission
Donna Chaw	-	Alberta Environment
John Deagle	-	Foothills Regional Landfill
Scott Gamble	-	CH <sub>2</sub> M Hill/Composting Council of Canada
Jasna Hundal	-	City of Calgary
Jim Moore	-	BFI Canada
Rhonda Rudnitski	-	NewAlta Corporation
John Rush	-	Waste Services Inc
Terry Rowley	-	City of Red Deer/ SWANA
Mary Stewart	-	Alberta Environment
Uli Wolf	-	Aquatera Utilities

## LANDFILL AND COMPOSTING FACILITY OPERATOR CERTIFICATION PROGRAM SYNOPSIS



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## DEFINITIONS

- (a) 'Act' means the *Alberta Environmental Enhancement and Protection Act*, R.S.A 2000 c. E-12, as amended.
- (b) 'Certified Operator' means, in respect of a landfill or compost facility, a person who holds a certificate recognized by the Director;
- (c) "Class I composting facility"<sup>1</sup> means a waste management facility which accepts 20,000 tonnes or more per year of feedstock for composting, for composting, but does not include:
  - a. a residential composter, or
  - b. a manure storage facility as defined in the Agricultural Operation Practices Act;
- (d) "Class II Composting Facility"<sup>2</sup> means a waste management facility that accepts under 20,000 tonnes/yr wet weight of feedstocks for composting, but does not include
  - a) a. a residential composter;
  - b) b. a Class I composting facility;
  - c) c. a Class III composting facility; or,
  - d) d. a manure storage facility as defined in the Agricultural Operation Practices Act.
- (e) "Class II landfill" means a landfill for the disposal of waste, not including hazardous waste;
- (f) "Class III landfill" means a landfill for the disposal of inert waste;
- (g) 'Continuing Education Unit (CEU)' - means 10 contact hours in an organized relevant continuing education experience as approved by the Solid Waste Certification Advisory Committee.
- (h) 'Conditional Restricted Certificates (CR)' means a program implementation (grandfather) certificate issued prior to September 1, 2001. The certificate is designated with 'CR' preceding the certificate number.
- (i) 'Experience' means full-time employment spent working at a landfill or composting facility.
- (j) 'Key operating personnel' mean all staff that are in responsible charge of daily operations of a landfill or composting facility.
- (k) 'Minister' means the Minister of Alberta Environment.

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<sup>1</sup> This is the new definition for Class I composting facility proposed in the Composting Facility Standards (2007). This definition does not take effect until the revised Waste Control Regulation is released.

<sup>2</sup> This is the new definition for Class II composting facility proposed in the Composting Facility Standards (2007). This definition does not take effect until the revised Waste Control Regulation is released.

- (l) 'Operations' means the active daily on-site processes or activities that ensure the landfill is operated in accordance with appropriate municipal, provincial and federal regulations and policies.
- (m) 'Year' is defined as one calendar year or 12 consecutive month.

## **SECTION1: PROGRAM HISTORY**

### **1.1 Regulatory Requirement**

Certified operators have been a requirement for Alberta landfill and composting facilities since 1996. The Waste Control Regulation (AR 192/1996), Part 3, Section 25, Subsections 1 to 4 state that Class II and III landfills, and Class I and II compost facilities shall be supervised by a certified operator during its hours of operation. The implementation date was September 1, 2001.

A solid waste certification program was developed by the Municipal Program Development Branch in 1997, where approximately 20 stakeholders representing the solid waste industry reviewed and provided input to the program.

### **1.2 Solid Waste Certification Advisory Committee (SWCAC)**

The first Solid Waste Certification Advisory Committee was formed in 1999 with 12 members representing waste management facility operators, academia, municipal government departments, Alberta Environment staff, and consulting engineers practicing in the area of waste management. The role of the SWCAC is to provide review and recommendations of the certification program.

Members of the SWCAC were appointed on three year terms and two new members were introduced each year as appointments expired.

### **1.3 Outcome Statement**

Landfill and Composting Facility Operators will attain an improved capability to operate and manage waste management facilities so that:

- Environmental quality will be protected;
- Public health and safety will be protected;
- Regulatory compliance will be assured;
- Landfill and Composting Facilities will be operated effectively; and
- Waste reduction objectives are met.

As of January 2009 there were a total of 30 certified composting facility operators and 157 certified landfill operators in Alberta.

## **SECTION 2: CERTIFICATION ADVISORY COMMITTEE**

### **2.1 Certification Advisory Committee Members**

Members of the Certification Advisory Committee provide review and recommendations concerning the Certification Program.

The Advisory Committee consists of the following Representatives:

- One representative from Environmental Assurance Division of Alberta Environment.
- at least one municipal government employee in a managerial position (not elected) responsible for municipal waste management facilities.
- at least one faculty member of a post secondary institution where that person conducts training related to municipal solid waste facility operations.
- operating personnel with representation from both landfill and composting facilities.
- one regional approvals representative from Alberta Environment
- one representative from each certifying partner.

The Solid Waste Certification Advisory Committee is co-chaired by the Waste Policy Advisor, Climate Change, Air and Land Policy Branch and one industry member.

The committee members serve 3 year terms which are staggered so that at least two of the positions will expire each year. Committee members have the option to renew their term once. The industry co-chair will be elected every 3 years.

### **2.2 Duties of the Certification Advisory Committee**

The Committee meets, as required by the co-chairs, to make recommendations on the following items:

- a) certification program requirements;
- b) exam bank review and update;
- c) evaluation of specific training/education with respect to the program;
- d) audit partner programs to ensure adherence to the program requirements;
- and
- e) other matters that may be requested.

Written requests for improvements to the program may be directed to the co-chairs.

## **SECTION 3: LANDFILL AND COMPOSTING FACILITY OPERATOR CERTIFICATION PROGRAM**

### **3.1 Certifying Partners**

In 2010 partnerships will be formed between Alberta Environment and Northern Lights Chapter of the Solid Waste Association of North America (SWANA-NLC) and the Compost Council of Canada (CCC) to administer the landfill and composting facility certification program, respectively. These associations will offer the basic certificate and will be required to have their certification programs reviewed and approved by Alberta Environment.

Landfill and Composting facilities could now meet the requirements of Section 25 of the Waste Control Regulation by obtaining certification from SWANA-NLC and CCC.

The landfill and composting facility operator certification program will take effect September 1, 2011.

### **3.2 Certified Operator Defined**

A review of the definition of a certified operator is underway as part of the Waste Control Regulation Review. The definition will be changed to enable the new program where a certified operator will be a person who holds a certificate recognized by the Director, and no longer needs to have a certificate of qualification issued by Alberta Environment.

The proposed definition is:

‘Certified Operator’ means, in respect of a landfill or compost facility, a person who holds a certificate recognized by the Director.

### **3.3 Recognized Certificates**

At the time of publication the following certificates are recognized by the Director:

Landfills:

Landfill Operations Basics Certificate – SWANA-NLC

Composting Facility:

Compost Facility Operator Certificate – Composting Council of Canada

### **3.4 Certified Operators**

All landfills and composting facilities regulated by Alberta Environment are required to have certified operators. This includes any Class II and Class III landfill that accepts only industrial waste. Composting facilities that are regulated through the Natural Resources Conservation Board do not need to have certified operators under this program.

It is the legal responsibility of the person responsible of each facility to be aware of the requirements for certified operators and to ensure that the requirements are met. The Registration or Approval issued by Alberta Environment will determine the minimum

certification endorsements. It is important that facility owners or managers develop an internal program so that substitute or replacement personnel are available as necessary.

**(a) Required**

The requirement for landfill and composting facility certified operators are provided in the Standards documents. These documents can be obtained at [http://www3.gov.ab.ca/env/waste/municipal\\_waste.html](http://www3.gov.ab.ca/env/waste/municipal_waste.html). The certified operator sections of the Landfill and Composting Facility Standards are included in Appendix A.

All operating landfills and composting facilities must be supervised by certified operators during hours of operation. The person responsible shall ensure that all key operational personnel have basic certification and that the facility has operators with the appropriate endorsements. For facilities that have only one key operating personnel, the Section 3.6 provides details on how to meet the supervision requirement during temporary absences.

**(b) Optional**

Employees at landfills and composting facilities that are not considered key operating personnel may be certified at will as long as they meet the program requirements. It is the recommendation of the SWCAC that any employee working at landfills and composting facilities be certified.

**3.5 Key Operating Personnel**

Key operating personnel are individuals that are designated as the on-site supervisors who are responsible for operations at the facility. This does not include employees or contractors that are exclusively employed for equipment operation.

Key personnel for landfills are, but not limited to, the following positions:

- Foreman<sup>3</sup>
- Site supervisor
- Site operator
- Operations Manager
- Lead Hand
- Lead Operator
- Senior Operator
- Regional Landfill Manager

Key personnel for composting facilities are, but not limited to, the following positions:

- Foreman
- Site supervisor
- Site operator
- Manager
- Compost Technician

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<sup>3</sup> Job titles are provided as examples. Determination of key personnel is based on the job description of the individual.

### 3.6 Distant Supervision

Distant supervision is the ability of the certified operator to review and direct operations of a landfill or composting facility through communication with assistant operators that are on site. This may be necessary during a period of time where the certified operator is temporarily or permanently absent.

Temporary absence can occur due to vacation, illness, maternal or parental leave etc, and the operator is expected to return to regular duties after the period of absence. The person responsible shall review the nature of the temporary absence and determine the necessary back fill requirements.

Permanent absence is period of time where the certified operator is absent due to circumstances that have released the certified operator from responsibilities at the waste management facility, e.g. re-assigned to other duties within the organization, or laid off. The certified operator is not expected to return to regular duties. The person responsible shall provide an alternative certified operator for the facility if the certified operator is permanently absent.

#### (a) Distant Supervision Guidelines

Distant supervision by offsite certified operator(s) will be allowed by AENV under the following conditions:

1. Where distance supervision is required, the person responsible shall notify the Director in writing or by calling 1-780-422-4505 of the distant supervision staffing plan. This shall include copies of any agreements with consultants or employers of the certified operator(s).
2. The certified operator(s) shall have valid basic certificates and have the required facility endorsements.
3. An employee of the landfill or composting facility is designated as the assistant to the certified operator and is onsite during hours of operation.
4. The certified operator shall visit the facility not less than one time per month. Such visits shall be documented in the facility's operating record.
5. Where infrastructure exists, the designated operator assistant shall be able to communicate with the certified operator from the facility via telephone or some other means of real-time communication.
6. The certified operator will regularly review the operations log with the operator assistant, and provide feedback and direction on issues encountered and short term operating plans.
7. The certified operator will be made aware of any complaints received by the facility, and any steps taken to address the complaint.

### 3.7 Certificate Types

All certificates will be valid as long as the holder uses reasonable care, judgement, and knowledge in the performance of operational duties.

No certificate will be valid if obtained or renewed through fraud, deceit, or the submission of inaccurate qualification data.

#### (a) Basic Certification

All key operating personnel employed at landfill or composting facility operations shall have basic certification after eighteen (18) months of employment at the facility.

A Basic Certificate is issued when an operator meets the appropriate experience requirements of the Certification Program and achieves a mark of 70% or better on the provincial exam.

#### (i) Qualifications for Basic Certification

An applicant for a basic certificate must:

- (a) be at least 18 years of age, and
- (b) have at least 1 year of full time operational experience at a landfill or composting facility

The full-time experience requirement must be current to be within the last 3 years from the date of application.

#### (ii) Application for Basic Certification

Application forms for basic certification can be obtained from Alberta Environment's website or from the certifying partners. Completed application forms should be forwarded directly to the certifying partners.

For Landfill basic certification, applicants should contact:

SWANA Northern Lights Chapter

<address>

<address>

<address>

[www.swananorthernlights.org](http://www.swananorthernlights.org) or 780-496-7988

For Composting Facility Certification, applicants should contact:

Composting Council of Canada

<address>

<address>

<address>

[www.compost.org](http://www.compost.org) or 1-877-571-4769

**(b) Provincial Certificates (issued prior to January 1, 2010)**

Certificates were issued by Alberta Environment between September 1999 and December 2009 to operators that met the requirements and successfully passed a provincial certification exam. These certificates were issued based on classifications of landfills and composting facilities defined in the Activities Designation Regulation at the time. Previous classifications are provided in Appendix B.

As of January 1, 2010, all certificates issued by Alberta Environment will be considered Basic Certificates. The certificates will remain effective until their renewal date.

**(c) Conditional Certificate**

Conditional certificates were issued to facilities that did not have operators that met the requirements for certification. Updates to the program have eliminated the need for these conditional certificates and will no longer be issued. Operators who have valid conditional certificates should comply with the timelines outlined in the conditional certificate to obtain basic certification.

**(d) Conditional Restricted Certificates (CR)**

Conditional Restricted Certificates can be renewed until December 31<sup>st</sup>, 2011 and will remain valid until the expiry date or until the operator is no longer employed at the specified facility. Upon expiry, operators must apply for basic certification.

**(e) Probationary Certificates**

This certificate is issued to operators that have attempted but have failed the exam.

Probationary Certificates are valid for 1 year.

**(f) Manager Level Certificates**

The SWCAC recommends that manager level certificates be introduced to the program at a later date. Key operating personnel are expected to be in supervisory roles and are required to obtain the basic certification. A manager level certificate covers competences above and beyond what is required for operators and is beyond the scope of the current program.

**(g) Facility Specific Certificate Endorsements**

Additional certification endorsements will be required based on facility specific activities and will be identified in the facility Registration or Approval. A facility may be required to have a number of endorsements, but each operator is not required to have all the required endorsements. i.e. A facility can meet all the required endorsements by having several operators that have different endorsements.

**(i) Qualifications for Certificate Endorsements**

Qualifications for certificate endorsements are program specific and are not the responsibility of the SWCAC.

Endorsement training programs will require approval by the SWCAC. Endorsement stickers will be provided to operators that have successfully completed the endorsement training to be placed on the basic certificate.

Endorsements do not expire.

**(ii) Landfill Endorsements**

If a landfill operation involves any of the following activity, the corresponding endorsements are required. The following is a list of landfill endorsements.

- a) Alberta Regulations<sup>4</sup>
- b) leachate collection and management
- c) landfill gas collection and management
- d) contaminated soil characterization
- e) sulphur containing waste disposal
- f) Household Hazardous Waste management
- g) bioreactor operations<sup>5</sup>
- h) groundwater monitoring
- i) Asbestos disposal
- j) Advanced litter control

**(iii) Composting Facility Endorsements**

If a composting facility involves any of the following activity, the corresponding endorsements are required. The following is a list of composting facility endorsements:

- a) Alberta Regulations<sup>6</sup>
- b) biosolids composting
- c) deadstock/meat processing waste composting
- d) controlled aeration systems
- e) food waste
- f) groundwater monitoring
- g) indoor composting
- h) packaging and labelling
- i) biofilter operations

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<sup>4</sup> Operators who apply for basic certification in Alberta will be automatically given the Alberta Regulations endorsement upon achieving a 70% on the exam.

<sup>5</sup> Effective when training courses are available

<sup>6</sup> Operators who apply for basic certification in Alberta will be automatically given the Alberta Regulations endorsement upon achieving a 70% on the exam.

**(h) Examination**

Alberta Environment, through the SWCAC, maintains and updates the exam bank from which the exams are prepared. Certifying partners will administer the provincial exam and all marks will be recorded and submitted to Alberta Environment for record keeping.

Each exam consists of 100 multiple choice questions drawn from the exam bank. The exam banks for composting and landfill facilities are developed from competency profiles and occupational analyses. The analyses were developed jointly by Alberta Environment, Northern Alberta Institute of Technology, Olds College and a number of operators and stakeholders in Alberta. Exam questions make up the following critical tasks for the respective categories:

**(i) Landfill Facilities Critical Tasks**

- Site Management
- Environmental Monitoring to Meet Regulatory Requirements
- Waste Handling
- Waste Screening
- General Site Maintenance and Operations
- Scale Operation
- Equipment Operation
- Site Administration
- Safety
- Public Relations
- Transfer Stations

**(ii) Composting Facilities Critical Tasks**

- Feedstock Management
- Health and Safety
- Site Operations Management
- Regulatory Requirements
- Composting Science
- Process Control
- Process monitoring and control
- Composting Technology and Equipment
- Communications
- Role of Composting in Waste Management
- Compost Markets

To obtain certification the examinee must obtain a mark of 70%.

**(i) Rewrites of Certifications Exams**

Operators with probationary certificates may rewrite the basic certification exam prior to the expiry of the certificate.

If an operator does not pass the exam prior to the expiry of the probational certificate, the operator must retake the training course prior to re-writing the exam.

**(j) Certificate Renewal**

Certificates will be renewed every three years to ensure that the individual continues to meet program requirements in a manner satisfactory to Alberta Environment. Renewal forms will be sent to operators 6 months prior to the renewal date. Operators must be able to demonstrate the renewal requirements are met. Verification of the operational duties by a supervisor or designate is required.

**(i) Renewal Requirements**

**i. Experience**

The operator must show relevant full-time experience in landfill or composting facility operations for at least 1 year out of the 3 years of the renewal period.

**ii. Continuing Education Units (CEUs)**

A total of 0.6 CEUs (6 hours of contact time) are required for certificate renewal. The applicant must provide evidence of relevant CEU hours at the time of renewal application. It is the responsibility of the applicant to keep records of the CEU taken.

The following is a list of approved courses and the assigned CEUs.

- a) Hatzcan Training
  - i. NORM 1.2 CEU
  - ii. Environmental Due Diligence 0.6 CEU
  - iii. Hazardous Waste Management 0.6 CEU
- b) Compost Council Canada Workshop (2 days) 1.0 CEU

**(k) Continuing Education Course Approval**

Courses are reviewed by the SWCAC and assigned CEUs based on applicability to the program and the amount of contact time.

Training program providers should submit requests for course evaluation to SWCAC and must include the following information:

- sponsor;
- certificate, degree or diploma awarded;
- topics covered;
- hours per topic;
- facilitator or instructor (Name and/or position description - institution programs may provide generic instructor position descriptions).

**(l) Inactive Certificates**

Failure by an operator to remain active in the landfilling or composting operations (or other experience approved by the Certification Advisory Committee) for at least 1 year of the

three year renewal period will mean automatic denial of certificate renewal. The certificate will then become inactive.

A certificate may also become inactive if the operator fails to renew or chooses not to renew prior to the expiry date.

**(m) Reactivation**

An inactive certificate may be reactivated upon application within three years of the date it became inactive.

After a certificate has been inactive for more than three years, application may be made for renewal. A minimum of six months of current, applicable experience is required.

**(n) Revocation**

Alberta Environment may cancel or suspend a certificate if:

- the person to whom the certificate was issued has contravened the Environmental Protection and Enhancement Act or Regulations under the Act;
- it is found that the person has practised fraud or deception;
- reasonable care, judgement or the application of the operator's knowledge or ability was not used in the performance of operation duties;
- the individual is incompetent or unable to perform prescribed duties properly;
- for any other reason the individual is no longer qualified to operate a landfill or composting facility.

**(o) Appeals**

In the event that an individual believes that these guidelines have been misinterpreted, applied inequitably, or special circumstances have not been considered, then the following appeal process may be used:

- a). Written appeal to the Solid Waste Certification Advisory Committee c/o Environmental Assurance, Climate Change, Air and Land Policy Branch; or
- b). Verbal presentation to the Solid Waste Certification Advisory Committee;

## **SECTION 4: LABOUR MOBILITY**

### **4.1 Trade, Investment, and Labour Mobility Agreement (TILMA) and Agreement in International Trade (AIT – Chapter 7)**

Alberta is currently the only Province in Canada that has a requirement for Certified Operators at Landfills and Composting Facilities. Labour mobility concerns have not yet impacted operators at waste management facilities.

The Alberta program is open to any operator that meets the requirements for basic certification and is not limited to operators employed in Alberta. The Alberta regulation endorsement, however, is only based on regulations pertinent to Alberta facilities and is not applicable to other jurisdictions. Only certificates with the Alberta regulation endorsement will be recognized as the basic certificate in Alberta.

### **4.2 Certificate Equivalence**

Any person who holds an equivalent operator certification from any province, or equivalent certifying authority, may be considered to have a valid basic certificate, if an Alberta regulations endorsement is obtained. Operators should contact the certifying partners to write the Alberta Regulations Module exam.

## **APPENDIX A: Landfill and Composting Facility Standards**

### *Landfill Standards:*

#### **4.1 Operator Certification**

- (a) The person responsible for a landfill shall ensure that during operations and until final closure all key operating personnel have a valid basic certificate after 18 months of employment at the facility.
- (b) To qualify for basic certification, the operator must:
  - (i) be at least 18 years of age; and
  - (ii) have one year of full time operational experience at a landfill which is current to within the last 3 years from the date of application.
- (c) All provincial certificates issued prior to January 1, 2010 will be considered to be basic certificates.
- (d) The person responsible for the facility shall ensure that the facility has the required certification endorsements as per the *Alberta Landfill and Composting Facility Operator Certification Guidelines*, published by Alberta Environment.
- (e) The person responsible for the landfill shall notify the Director in writing of the names of all the key operating personnel, the required facility endorsements, and any change in any of the key operating personnel or facility endorsements within 30 days of the change.

### *Composting Facility Standards<sup>7</sup>:*

- (a) The person responsible for a composting facility shall ensure that during operations and until final closure all key operating personnel have a valid basic certificate after 18 months of employment at the facility.
- (b) To qualify for basic certification, the operator must:
  - (iii) be at least 18 years of age; and
  - (iv) have one year of full time operational experience at a composting facility which is current to within the last 3 years from the date of application.
- (c) All provincial certificates issued prior to January 1, 2010 will be considered to be basic certificates.
- (d) The person responsible for the facility shall ensure that the facility has the required certification endorsements as per the *Alberta Landfill and Composting Facility Operator Certification Guidelines*, published by Alberta Environment.
- (e) The person responsible for the composting facility shall notify the Director in writing of the names of all the key operating personnel, the required facility endorsements, and any change in any of the key operating personnel or facility endorsements within 30 days of the change.

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<sup>7</sup> To be updated in the Composting Facility Standards (2007)

**APPENDIX B: Municipal Waste Management Facility Operator Certification Program classification**

Classification of Landfill and Composting Facilities according to the Municipal Waste Management Facility Operator Certification Program (September 1999 – December 2009)

Facility	Based Upon	A	B	C	D
Class II Landfill	Tonnes/year	Over 50,000	10,000-50,000	2,000 - 10,000	Under 2,000
Class III Landfill	Tonnes/year	Over 50,000	10,000 - 50,000	2,000 - 10,000	Under 2,000
Class I Compost	Tonnes/year	over 20,000	500 - 20,000	under 500	
Class II Compost	Tonnes/year	over 20,000	500 - 20,000	under 500	