

COMPOST OPERATION STAKEHOLDER ADVISORY GROUP MEETING

YATES MILL PARK

MEETING MINUTES

TUESDAY, APRIL 20, 2010

1:00 PM WELCOME BACK: DAVE HALLEY

1:10 PM BEHIND THE SCENES: DAVE HALLEY

- **WHAT HAS BEEN GOING ON SINCE FEBRUARY MEETING?**
Steering Committee has had several meetings over the past two months. They decided to take a first crack at a structure for a new compost permitting process that can be presented to the group. That's what you will see today, a proposal for a new permitting process. This is not DWQ's plan, or a Compost Councils plan; this is a marriage between their two proposals. I'm going to outline all the new changes to the permitting process. When we go through the process I'm very interested in what questions you have, feedback you may have and what changes you have to make it better.
Also during interim period the Steering Committee conduct telephone interviews with several states and in particular Washington State. Several states also responded to an email survey. Several states are dealing with the very same issues.
- **WHAT IS PLANNED FOR TODAY?**
Overview of Today's Agenda
- **ROLE OF STAKEHOLDER GROUP**
Consensus cards are out today. Try and get you to use them when asked to do so.

1:30 PM DWQ'S LEGAL REVIEW AND OPINION REPORT: KEN PICKLE

Reference: 2 page PDF from Kathryn Jones Cooper – Informal Opinion Questions Concerning Compost Facilities (POST TO PORTAL)

Questions 1 and 2 – what's a wastewater and what's a stormwater with regards to rainwater that hits the piles?

Call you back to 2005, two facilities came to DWQ at that time for a stormwater permit. What's your facility type, its compost, nope that's a wastewater. That was DWQ's response. It was our policy and is our policy still that runoff discharges from curing piles is a wastewater.

In 2009 the General Assembly passed a session law that gave rise to the situation we're in now with this group. We've gone back to the Attorney General's office and asked for an opinion and here it is.

You can really skip Page 1 and Page 2. What matters is over on Page 3 – our attorney's conclusion. Please see last full paragraph on Page 3 of the handout.

Whether it's a wastewater or stormwater you're under the NPDES program. Opinion offered by Kathryn Cooper and Anita LeVeaux.

The opinion largely presents the perspective that DWQ has espoused since before the 2006 draft policy memo – contact runoff is defined as wastewater. But, not entirely. **With respect to the runoff from finished compost, it could be permitted as a wastewater or stormwater.** We still have issues with even finished piles. Given the Attorney General's opinion we now have some flexibility to do some things maybe we weren't prepared to do before.

Dave Halley: Reactions? Does this hinder the process, does this help the process?

Bob Rubin: Help me if I'm wrong, one of the concerns expressed early on is bulk finished process transferred to a user. Concern this product transferred would be regulated. What I'm reading here is that the runoff from the bulk product would not be regulated as a wastewater.

Ken Pickle: Neither the wastewater guys or stormwater guys have any authority other than the manufacturing site. We don't chase fertilizer around, yogurt, etc. We only have authority at the manufacturing site.

Jennifer Jones: I don't know if you're aware but Department of Transportation does have a permit and things that are transported are covered under that permit.

Dave Halley: I think this may allow you the flexibility to have finished product on your site, and if it's managed correctly runoff from finished product could be considered stormwater.

Scott Mouw: I think the sensitivity of the industry is around the finished product because this is what they're selling to the end user. They don't want this to cause an issue with marketing or public opinion of the product.

Bob Rubin: Would like you to thank the Attorney General's office.

2:00 PM A PLACE TO START - STEERING COMMITTEE'S DRAFT PROPOSAL: DAYE HALLEY

- WHAT PROPOSED CHANGES ARE THEY RECOMMENDING FOR COMPOST PERMITTING PROCESS?
- HOW WOULD THE PERMITTING PROCESS WORK (FLOWCHART)?
- WHAT FEEDBACK DO YOU HAVE FOR THIS PROPOSAL?

Reference: Surface Water Permitting Proposal (Post to Portal)

Frank Franciosi: When we looked at other states that we would want to model after, Washington came up as one with similar rainfall. Cedar Grove Composting would be considered a Large Type III in our world. The way they were designed they have a dirty half and a clean half if you want to call it that way. (Reference: Cedar Grove Composting doc on Portal) We talked to Jerry Bartlett who helped design and manage this site. We also talked to the Solid Waste regulator and Water Quality regulator specifically about how they do surface water collection and composting facilities.

Dave Halley: I asked the group to provide input and recommendations on revisions to the new permitting process for composting facilities. I asked them to put a proposal together that merged positions into one proposal for the group to review and provide feedback on. The group outlined that:

Zero discharge can be accomplished through a number of BMP's, including:

- a. Recycling of process water in operations
- b. On-Site application (within permitted boundaries)
- c. Establishment of cover over all operations
- d. Sequential best management practice mechanism that effectively treat process water to discharge
- e. Or Other methods approved by DENR

Billy Dunham: Recycling process water in operations, does that mean you're going to have to have some kind of holding basin?

Frank Franciosi: Yes

Billy Dunham: Why do I have to have a lined basin if it's not going anywhere off the site?

Dave Halley: That seems like a zero discharge then. Does that fall under the other items?

Billy Dunham: If it's running off to a field it's not any one of these items.

Frank Franciosi: It's item E.

Group: It's B for Billy's site.

Jennifer Jones: So you don't need a groundwater permit if you're land applying it on your own property?.

Jon Risgaard: You normally would but DWM will address this on their permit.

Michael Scott: We're going to handle that on our permit. In regards to Billy's permit you may be B but I'm not sure you'll completely fit into that.

Scott Mouw: You may qualify under B but there is going to be a monitoring component. Under that monitoring there will be certain parameters that may trigger another permitting process.

Michael Scott: We've been talking about monitoring for discharges. If there is no discharge we were not monitoring.

Ken Pickle: If he has no discharge we won't give him a permit.

Bradley Bennett: I believe you were talking about groundwater monitoring.

Michael Scott: If we recommend groundwater monitoring wells, we will manage that through our DWM permit.

Jennifer Jones: It does not happen very often that a facility meets non-discharge. Possible but difficult.

Dave Halley: I think I've learned through this process that as long as it is on your facility it's process water. It's not a wastewater until it leaves your site?

Wastewater and Stormwater Permitting (Steering Committee Recommendation):

Compost facilities that segregate their finished and un-finished product flows will have the option of having ability to have a wastewater and stormwater permit for their discharges to surface waters.

If the compost facility does not segregate their finished and unfinished product, and if their flows comeingle, then all discharge to surface waters would have to be treated as wastewater and would require a more restrictive wastewater permit.

Jon Risgaard: Have we clearly defined finished product?

Dave Halley: That's another discussion today. Michael Scott to present that discussion later on today.

Ken Pickle: This is a straw man proposal is for the group to comment on and make better. This is not entirely a consensus opinion. We have an Attorney opinion. DWQ believes that calling runoff from finished product stormwater is okay for Type 1 and Type 2 facilities, but we are not there for Type 3 and Type 4.

Steve Larson: Where does raw material fall?

Ken Pickle: Raw materials, by this proposal, generates waste material.

Bradley Bennett: You were asking to use raw material to determine where the stormwater/wastewater falls?

Frank Franciosi: I think if you have a raw material that is a biosolid it's a lot different than mulch or bark. I don't think you want to get into regulating this material. To me the Type I is more of a mulch versus the biosolids or food waste. The Cedar Grove facility actually has their food waste under cover but mulch and bark are out in the open.

Bob Rubin: It seems to me that you could separate the two – bulk storage for mulch or bark could be separated from more reactive material.

Jeri Covington: At the beginning of the process, did we not say we were not looking at the raw materials?

Michael Scott: I would clarify raw material. Maybe separate the carbon from the feedstock. I believe the runoff from them could be very different.

Jon Risgaard: Would it be as simple as looking at what puts you into a Type II and Type III facility?.

Michael Scott: That would be a quick break. If you want to drop out all the Type I. But that's dropping the grass clippings and leaves.

Jon Risgaard: I'm assuming you have a pretty good idea of your ratios coming in.

Frank Franciosi: Virtually all facilities are co-mingling because it's virtually impossible to separate at the curb.

Michael Scott: Where would you separate the C:N ration as being high enough?

Frank Franciosi: 40:1

Michael Scott: A lot of the metals are going to come from the sludges and be on the nitrogen side rather than the carbon side. General response is that the metals would be generated on the nitrogen or nutrient side.

Jon Risgaard: Once those materials start breaking down is going to be an impact on those metals released

Michael Scott: pH is going to be a factor

Frank Franciosi: Your pH of your compost is normally going to be at a 7 so you're not getting an acid leaching from the compost.

Proposed New Changes to Compost Permitting Process

General Permit (Steering Committee Proposal)

A new DWQ General Permit would be developed for Small Type 1 and Small Type 2 facilities and a new General Permit for Large Type 1 and Large Type 2 facilities. All of these facilities would apply for General Permit. These permits will cover both Stormwater and Wastewater discharge treatments. Type 3 and Type 4 Facilities would require individual DWQ stormwater and wastewater permits.

Michael Scott: Small Type I are not a permit, they are processed as a notification. Bringing those types of facilities, 140 of those, represented by many small towns, bringing those under a general permit I just don't agree with at this time. I understand bringing two's through four under a permit. The basis for a general permit I don't agree with whole heartedly at this point.

Frank Franciosi: Under the permitting part I would make sure they're showing up and being tracked. As far as having a permit not so sure.

Ed Mussler: Statement clarified with the Compliance Branch) Notifications are being inspected one time per year at least. All complaints regarding notified sites are responded to and problem facilities are visited more often than once per year.

Frank Franciosi: Maybe they should all be a notification instead of a permit.

Billy Dunham: Volume wise what are we talking about.

Michael Scott: 6,000 cubic yards per quarter.

Consensus Questions posed to the group:

Do you support a general permit for Small Type I Facility? (Split – No Consensus)

Do you think it's important we track Small Type I Facilities? (Yes - Consensus)

Michael Scott: Small Type I notification is a two-page application

Ken Pickle: Don't they agree to abide by certain regulations?

Michael Scott: Yes, they have certain rules, setbacks to abide by

Ken Pickle: Need to determine whether DWQ should ignore the Small Type I, OR issue General Permit, OR issue Notification type like DWM?

Jeri Covington: You are all part of the same agency can't this just be covered under the notification and shared with DWQ?

Michael Scott: That database is already shared with DWQ, can easily be provided to DWQ.

Scott Mouw: Why would you not want to have a general permit for Small Type I Facilities? (directed at Michael Scott)

Michael Scott: We're already having a hard enough time with other larger facilities. We're not going to be able to monitor and inspect all of these facilities.

Frank Franciosi: Please remember you are working with a 40:1 ration here. You're talking about benign material here.

Jennifer Jones: Can I ask how long does a 40:1 ration take to cure?

Frank Franciosi: Very long – up to a year.

Dave Halley: Consensus seems to be that we want to track these Small Type I, maybe through notifications and then share this information some way between agencies – to notify DWQ.

Ken Pickle: We don't want to know about facilities we don't regulate.

Stacy Smith: Speaking from the perspective as an engineer even if you don't inspect these facilities I think it is important that they must complete a form notifying you of their operation.

Scott Mouw: In terms of the process would we want to take that back to the steering committee and work that out.

Steering committee is to take today's comments under advisement and come up with new general permitting proposal. There may be no need for a General Permit for notification sites.

Monitoring Plan (Steering Committee Proposal)

A plan will be proposed that will outline what will be tested for, where to sample, the frequency of testing, established limits, how to report exceedences, and outline a process for corrective actions. This will be a tiered approach. Monitoring will not be required for Small Type 1 and Small Type 2 Facilities, but they must agree to allow spot inspections by state inspectors, and subject violations if they exceed benchmarks.

Stacy Smith: If some of these BMPs come in to play would this possible decrease the need for monitoring.

Ken Pickle: Implementation problem here is how do you know the BMP is being maintained? Maybe for a Small Type I we might say put a 50 foot grass buffer around and some minor BMP and that might be okay. But across the other sectors we're not going to say you don't have to meet the numbers.

Stacy Smith: It could certainly be an incentive for somebody who's on the borderline. Even if it's just a sentence there that would leave it open for the future.

Frank Franciosi: If I show you 5 years of data that show my levels for this BMP have gone down significantly maybe I could ask to test only 3 times a year, not now. Maybe he's suggesting we analyze the date and you make your case and you could prove you're meeting requirements routinely.

Ken Pickle: We always entertain a condition based on data.

Jeri Covington: Some reduction in monitoring if there were substantial information showing we're compliant.

Jennifer Jones: I think we have a problem with reducing the monitoring for any one specific site under a general permit. We can change the monitoring for an individual site holding an individual permit, but not for a site holding a general permit. Tradeoff, it's much easier to apply for a general permit than an individual permit.

Jeri Covington: Maybe that needs to be clarified in this process – general versus individual permit.

Bethany: It's going to be years down the road before we could change a general permit.

Ken Pickle: It will be a year before a general permit is available

Frank Franciosi: Could we explain the process for a general permit?

Bob Rubin: The State applies for a general permit, they have to get their package together, hold several public hearings. There's absolutely no way EPA is going to have a general permit issued back to the State within a year.

Frank Franciosi: You're looking at 6 months to a year before you get a response.

Bob Rubin: That process would take close to a year. Even the process of renewing general permits takes time.

Bradley Bennett: None of you guys would be applying for the general permit. We (DWQ) would be drafting the general permit for EPA approval. We do have some things established where they have timeframes to reply to us. It could take a year, could be shorter – just depends. Comments on draft make a big difference on the timeframe for the process.

Ed Mussler: If you're not going to monitor Small Type 1 and Small Type II facilities why do they need a general permit?

Ken Pickle: The permittee is still required to show us they have a management plan for this permit.

Jennifer Jones: I think what Stacy said about having a notification, where permittees having a notification with conditions may not have read the entire conditions, but know that DWQ could visit it is a good tool.

Stormwater BMP's (Steering Committee Proposal)

A BMP Guidance Manual would be developed for Compost Facilities. It would be comprehensive manual describing types of practices that could be implemented or combined in a series to address specific compost related stormwater runoff treatment. These BMP's are not intend or designed for treating wastewater (leachate), but manual may outline on-site modifications to the facility to decrease the volume and makeup of wastewater discharge.

Group: Designing a system is going to be much easier than retrofitting older facilities.

Extraordinary Storm Event (Steering Committee Proposal)

There will be allowance for discharge under extraordinary circumstances, such as a 25 year, 24 hour storm event. Washington State has an Emergency Stormwater Permit that allows them to discharge to a land application system in the event of an extraordinary storm event.

Stacy Smith: How does the Washington Stormwater Emergency Permit work?

Ken Pickle: We didn't get too many details on that. That flow was put into a sewer line that went into a POTW. If the POTW could not handle that excess flow they were permitted to release that flow onto a land application spot on their site. That was a wastewater provision.

Dave Halley: I did get the implication that that the Emergency Permit cost money and they didn't want to do that unless they had to.

Finished Product (Steering Committee Proposal)

A definition and maturity test will be developed by DWM to determine when a product moves from the "curing" stage to the post process or finished product stage. There may be the need to have two types of finished products. One being an Agricultural Grade finished product that could be spread on agricultural fields (shorter maturity period) and one Consumer Grade finished (longer maturity period) product. Discharges from finished product piles for sT1, sT2, LT1, and LT2 would be treated as Stormwater initially, but elevated to wastewater if discharges consistently fail to meet benchmarks via tiered approach. Discharges from finished product piles for T3 (not consensus of group) and T4 facilities would have to be treated as wastewater. Facilities will be encouraged to segregate finished and curing piles, and design facility to keep discharges/runoff from these piles from mixing.

Dave Halley: Steering Committee said we need to really define what a finished product is. Discussion this afternoon on this.

Ken Pickle: Just to reinforce the point Dave made – it makes a difference to DWQ whether somebody has a finished pile that has met 131 degrees for 3 days and cured for another 4 days as opposed to someone who has a pile that has been there for 12 months. That makes a difference to us how lenient we are on the flows from that pile.

Frank Franciosi: There was no consensus on either category. In my mind the DWM issue is when do we stop calling this waste product and start calling it a finished product. Not only is this a public opinion issue but I think

there's legality to that. How do you separate wastewater and stormwater? I think it's based on nutrient load. That's why 3 and 4's should be considered.

Bethany: From a DWQ standpoint it's how do those heavy metals impact the aquatic life? Which I don't think DWM really takes into account.

Frank Franciosi: Are those metals soluble? I think we can prove most of those metals are not. They're using compost to remediate lead in mines in West Virginia.

Dave Halley: Until you can help DWQ understand and agree what is coming off those "finished" piles, they're going to be leery about what to call runoff from finished piles from Type 3 and 4 facilities (stormwater vs. wastewater). We need to work to create something they feel adequately protects surface waters.

Naming (Steering Committee Proposal):

For the compost industry marketing purposes we like to call the stuff that percolates through the curing piles leachate or process water, not wastewater. By rule, when this leachate or process water leaves the site or is discharged off the facility, it should be called wastewater. As long as it remains on site it is called leachate or process water.

- For the compost industry marketing purposes we like to call the stuff that percolates through the curing piles leachate or process water, not wastewater

Jon Risgaard: To some extent you can call it whatever you want but it's still wastewater.

Jennifer Jones: There's a concern you don't want to call it wastewater because it's a finished product. There are lots of examples of facilities that produce wastewater, and still sell their product. I guess with the NPDES permit at the chicken plant there's a lot of wastewater but you can take the chicken and sell it

Jeri Covington: You have to understand that some of this water is a process water that we are putting back on the product. With chickens you are not taking the wastewater and putting it back on the chickens.

Ed Mussler: What's the issue with calling it process water not wastewater? What's the problem from DWQs perspective as long as you regulate it the same way.

Jennifer Jones: We have to call it wastewater to regulate it.

Ed Mussler: You can change your rules. Industry has a problem with it being called wastewater.

Jennifer Jones: I'm not saying we have to call it wastewater but there are many industries that call it wastewater and still are able to sell their product.

Scott Mouw: To the extent DWQ can let go of their point on this, this product is being applied in beneficial use by consumers. And it is possible a user may stop using the product if they learn a wastewater is being applied on a product being used on a golf course or garden, etc. We need to work to move forward in the process on this point.

Joe Hack: We have seen that people's perceptions changes based on what you say is in the compost. They think yard waste compost is the greatest thing, as soon as you say there's food waste in there the opinion changes, and even more so when you say sewage sludge has been mixed in.

Jon Risgaard: I think some of this is maturity of the program.

Dave Halley: I don't think in Holly Springs, they want to put "wastewater" on their "Reclaimed" water tower. I think this is a naming consideration request from the compost industry from a marketing standpoint.

Jennifer Jones: We have no authority to regulate once it leaves the site but I can see their point.

Certification of Operators (Steering Committee Proposal)

New process would require Certification of Compost Operators for LT1, LT2, T3 and T4 Facilities.

Certification of Operators may not be required for sT1 and sT2 facilities.

David Goodrich: Would this be something under the current certification program or is this something additional?

Frank Franciosi: There is not currently requirement for operator training. We're not sure what would be put in place. The council does have certain training events already in place. I think it is something that needs to be developed

Bob Rubin: There are two issues – who's best qualified to do the training - the industry, who's best qualified to certify – the state. Certification is best provided by the State, Training is best provided through the professional organization.

Jeri Covington – Notification process would be helpful for the Small Type I and Small Type II so you could notify them of the training opportunities.

Ken Pickle: My whole understanding that this discussion is pointed at DWM not DWQ to certify compost operators

Steve Larson: Clarify the definition of Operator

Frank Franciosi: Level of certification for various operators

Jon Risgaard: If waste management takes over some of the Land Application I'm not sure if you're certification covers some of that.

Michael Scott: Our land application operators, at a higher rate, already attend certification training so there is some overlap there.

Simple permit process schematics have been started. Several rough drafts have been produced.

3:00 PM FINISHED PRODUCT? : MICHAEL SCOTT

- HOW SHOULD WE DEFINE FINISHED PRODUCT?
- WHAT IMPACT DOES THAT MAKE ON THE PROCESS?

Reference: Finished Product presentation (On Portal)

Solid Waste Regs: Finished product based on Federal standards for: pathogens, heavy metals, foreign matter and total N, and have time and temperature data for some set timeframe then you're clear to distribute

Is a finished product that satisfies the State and Federal requirements suitable for all end users?

Brian Rosa: No

Frank Franciosi: It's not mature enough, you may still have some active composting going on. You may risk damaging plants especially in a greenhouse. In an ag situation you're still preparing or amending.

How do we further define finished product?

15 days at or above 131 F?

Industry looks at two terms: Stability and Maturity

I was asked to answer the following questions:

- How should we define finished product?
- What impact does that have on the process?
- What do we call what comes off finished product; stormwater or wastewater?
- How do other states address finished product?

State of Washington uses the Solvita test. Other States take it a step further than we currently do.

Steve Cockman: Primarily our customers dictate our degree of finished product. For our ag customers it could be as little as 15 days. That would not be suitable for nursery, greenhouse, or landscaping. Most of the products we sell are in the range of 60-90 days in age.

Michael Scott: When we say finished compost can be made in 60 days you're exempting some of Steve's agricultural market. Trying to present the difficulties of defining finished compost because there are different markets. Steve already uses the Solvita test because he does not want to send out an immature product. He'll only do that one time.

Solvita CO2 Test

Interpreting Solvita CO2 Test Results – Levels 8(Finished Compost) to Level 1 (Raw Compost)

Frank Franciosi: The Solvita Test uses a matrix comparison for CO2 and Ammonia test. Could also be done in a lab. These are about 5 bucks a test. You're really only buying a refill kit once you buy the jars. Takes 4 hours to run the test. Compare the color of each paddle to the color chart and then you match those numbers to the CO2 and Ammonia charts.

Jon Risgaard: How often are you performing this test on your piles?

Frank Franciosi: You don't generally have to do it when you've got your process down and your feedstocks have not changed. It's a judgment call if you need to do this. You can also send it to the lab for a more detailed test but takes 2 weeks to get your results.

Solvita Ammonia Test

Michael Scott: I don't think we need to spend much more time on this. This was a 15 minute presentation. What would be your recommendation out of the Stakeholders Group of what is a finished compost product? Looking back to the group – do we incorporate the Solvita test, a 15-30 day duration, etc.

Frank Franciosi: I think looking at Washington is good. Virginia has it tied to distribution – so it's end product use.

Jennifer Jones: Do you typically keep you piles separated?

Steve Cockman: Yes we do.

Jennifer Jones: Can you plant immediately in that ag use product?

Frank Franciosi: Not immediately – once it's been tilled into the soil.

Ed Mussler: We're looking at this from a stormwater, wastewater perspective. So it really doesn't matter what the product is. It matters what the runoff from that pile is. It's not a wastewater after it's gone through a certain product. Whether it's ag product or home product is irrelevant. Maybe we need to look at a 3rd way with this test to give us a best practices guide for management of the water for DWQ.

Scott Carpenter: You want to say this is not wastewater now because that little tab shows a certain color? We have labs that do this testing. How well is the legality of this going to hold up in court.

Frank Franciosi: It's a combination of rules in place and this testing.

Ken Pickle: We don't have this feature in another part of our program, where wastewater turns into stormwater.

Ed Mussler: Aren't you in trouble if you don't meet regulations? It doesn't matter what the material is. I'm saying if you violate your stormwater permit there's some kind of fine or action.

Dave Halley: You may have to move this pile.

Ed Mussler: Well that may be one of the fixes. What I'm hearing is depending on what's in the runoff determines if this is a wastewater or stormwater. It doesn't have to be perfect cause there's a built in backup.

Scott Mouw: I think we need to add this to the straw man. Whether the steering committee handles this or we make another small committee to figure this out.

Michael Scott: Frank's facility is a member of STA – all of this is done in a certified lab.

Frank Franciosi: As an operator I would use that test to determine if my pile is going to the finished piles storage area. Before I sell that to the public I test that in the lab.

Scott Mouw: Let's establish a process not get stuck in the weeds.

Bob Rubin: I think this is something we can do through the Monitoring Committee.

Note: Add Steve Larson to the monitoring committee.

3:15 PM MONITORING SUBCOMMITTEE REPORT - JOE HACK

- SUMMARY OF THEIR MEETING
- WHERE ARE THEY HEADED WITH A MONITORING PROTOCOL?
- WHAT FEEDBACK DO YOU HAVE FOR THEM SO FAR?

Joe Hack: Looking at base parameters for monitoring. Types 2, 3, and 4 facilities may need more monitoring. Agreed to get some level of peer review and will also help with consistency of data. One item tabled is do we need more data. We don't believe an additional sampling program at this time is necessary.

MINUTES OF MONITORING COMMITTEE (POST TO PORTAL)

3:45 PM STORMWATER BMP PRACTICES FOR COMPOST FACILITIES: BILL LORD

- WHAT MIGHT WORK?
- WHAT MIGHT BE SOME OF OUR OPTIONS?
- WHAT FEEDBACK DO YOU HAVE ON BMP'S?

Reference: National Stormwater Quality Database (can Google)

- Large variety of samples
- Large variety of sites
- Tells you what stormwater looks like coming off these sites

Runoff curve numbers for compost windrows are unknown

Wallace Farms Composting facility data set – Type 3 facility

More data needed – two data points we have are at high end of range associated with stormwater BMPs. If runoff is like Wallace Farm data, traditional stormwater BMPs probably can be designed to work, either stand alone, or in a treatment train.

Mecklenburg Co. Compost Central data set

Again, more data needed. It would be helpful to know what fraction of BOD, COD, and phosphorus are dissolved, and what fraction are particulate. Traditional stormwater BMPs can remove particulates successfully, but not generally dissolved pollutants.

For pathogens – settlement BMP and filtration BMP needed

If On-site materials are covered it is likely runoff characteristics would resemble Wallace Farms and single BMPs may suffice

Covering materials reduces pollutant load on BMPs and may result in reduced costs in the construction and operation of those BMPs

Michael Scott: Training revolved not only around solid waste training but BMPs for both ends.

Frank Franciosi: When we submit our operation manuals we have to explain what we do on a daily, weekly basis, etc. to those structures. On your thought of getting someone on-site certified on BMPs.

Jeri Covington: For existing sites when you talk about putting BMPs in place. There are some sites with limited space and cannot implement some down-gradient BMPs.

Bill Lord: Go look at City of Durham. That is a problem retrofitting some sites into these BMPs.

Jeri Covington: It's not always going to be a possibility to buy the adjacent property to implement these. Do they decrease the size of their operation area?

Bill Lord: Dealing with an experienced person in this will help avoid some of these surprises down the road.

Ken Pickle: Let me further respond to Jeri's remarks. What does that mean for DWQs side of the process – we will push and push and push for the engineering resolution. If you're in a tight spot and you can't, then that's tough. I've never actually been through the process but I've heard that there are provisions in our process for economic hardships. I think one of the things I've said repeatedly in group here is if all you need is time I'll work with you. And if someone has something they can't get in the budget till the third year we can work with that. If someone says no I'm not going to do that I'll go out of business – well make that choice.

Frank Franciosi: I think closing these facilities is not an option. I think there's going to be more opportunities for municipalities. They may want to be a grinding operation and then transfer that material to a bigger facility which needs the carbon source.

Scott Carpenter: The rules that might be enacted from this may shut down facilities?

Jeri Covington: Yes

Scott Carpenter: That's just not right – you're going to shutdown a 60 year old man who's done this his whole life.

Jeri Covington: I would hope that financial aspects are taken into consideration.

Ken Pickle: I was illustrating the worst case scenario, but let me say we're highly motivated not to shut anyone down.

Steve Larson: My facility is a very large facility. 200 facilities throughout Canada and the US. Small plant in Elizabeth City. My plant has a lot to do with my future. What's coming out of here may not make it feasible for us to stay in North Carolina. Financially we have to look at that. There's 32 people that look to me to keep that plant in operation but when that's all said and done does it make sense to stay there. My facility has been there for 30 years. We're tossing around option B and option C right now. Financially you've got to do what you've got to do.

Jeri Covington: These very small towns and municipalities are on very small/tight budgets.

Billy Dunham: I can't afford to put in lined lagoons everywhere. The grease traps we pump in Eastern NC if we were not pumping them they'd be going into sewer systems. From what I'm hearing here it's going to be economically impossible for me to meet what's coming out of here.

Frank Franciosi: Part of the House Bill is identifying costs.

Billy Dunham: Part of it is we don't want to pollute the water. I don't think I am and I don't want to do that either. The financial end is a major concern for me.

4:15 PM NEXT STEPS/NEXT MEETING/CLOSING

Dave Halley: We need to put some more meat on this skeleton proposal. You can see now we're really getting into some of the details of a new permitting process for compost facilities. We have some tough decisions to make. We need to start putting ourselves in other shoes of other folks in the room when we start considering solutions. We need work together to create solution we all can work with. It may not be the position you started with, but it is a decision you can live with. The Steering Committee and Monitoring Subcommittee will be meeting again will be bring back another set of proposals for you to consider.

NEXT COMPOST STAKEHOLDERS MEETING – May 27, 2010 (Thursday) – need to confirm location
NEXT STEERING COMMITTEE MEETING – May 6, 2010 1:00 PM

Minutes compiled and submitted by:

Liz Patterson, DENR-DWM

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