

## Compost Operations Stakeholder Advisory Group

Coleen Sullins-Director  
NCDENR Division of Water Quality  
1617 Mail Service Center  
Raleigh, NC 27699-16117

September 22, 2010

Dear Ms Sullins:

As you are aware Session Law 2009-322 has directed NCDENR-DWQ to review and establish best management practices for North Carolina Composting facilities in regards to water management. The law also required the formation of a stakeholders group to provide input and assistance to NCDENR in addressing water related issues of composting operations. The Compost Operation Stakeholder Advisory Group (COSAG) has been meeting since November of 2009 and has been formulating consensus on various recommendations and proposals that address water management issues associated with composting facilities. Our facilitated meetings have fostered open dialog between all stakeholders and they have been encouraged to think outside the box.

At our last stakeholder's meeting we reviewed a set of possible new non-discharge options to the compost permitting process, subsequently proposed in memorandum dated August 13, 2010 to you by Jon Risgaard of the Aquifer Protection Section. These proposed new non-discharge options received the full support of the group. By way to this letter COSAG would like to formally support these new non-discharge options and request that your office give them strong review and consideration.

The main reason COSAG supports the Division's efforts to investigate these additional non-discharge disposal options within the existing regulatory framework is that it would not require the hydrogeologic investigation. The stakeholders feel that the current required evaluation is unlikely to provide sufficient increase in environmental protection to offset the high costs associated with the evaluation due to the likely seasonal need for disposal of the process wastewater. We feel these options provide both a balance in cost savings and appropriate level of environmental protection. The other reason COSAG encourages DWQ to investigate these new options is that it will allow for the beneficial reuse of the process wastewater by allowing the better utilization of the nutrient content of the water.

We appreciate your consideration of these alternatives and your prompt attention to this important matter.

Sincerely,

David Halley  
Facilitator of COSAG