

Assessment of the Permitting Process

What problems/issues/concerns with the current compost facility permitting process would you like to solve?

Following the DWM process presentation:

- The permitting process should include a water-quality review integrated and not as separate process. The permitting process between the two divisions should be seamless.
- I would like to solve the method for coordinating with other agencies in the permitting chain.
- I would like to solve the coordination with DWQ on water quality permits integrating needed info with DWM application process (e.g. how is stormwater runoff handled, segregated, etc.).
- I would like to establish routine methods/communication between DWM and DWQ, in order to minimize delays for the industry.
- Specific interface w/DWQ, codifying or formalizing what goes over to DWQ.
- Time defined – from submittal to approval
- Renewal of permits – mapped out – process flow.
- Leaves given away? Needs communicated to municipalities. Must go to composting facility.
- Better control of timeline by returning applications immediately that have major omissions.
- Facility design requirements and costs. Guide for reviewing submittals for permits to insure everything is included.
- A time line average for final permit.
- Time line needed, check off list for applicant to submit application
- Exemptions for other small compost operations < 1000 cubic yards per quarter.
- I would like to solve the delay in what is considered a complete submittal. Need to have a checklist so facility operation knows what to submit.
- Where DWQ may need to fit in to some of the smaller facilities (depending on feedstocks, location, etc.)
- Timeline/Time frame issue. Better guidance on timeframe and permitting process for the private sector.
- Application completeness checklist
- Current WQ and SW review process for new facilities and renewals
- I believe DWM has an excellent process. I have encountered no problem provided application is complete.
- Agree on BMP's to mitigate – so if application incorporates BMP – it is speeded through permit process.
- Composting permit – described and mapped
- Time defined from application submittal to operating permit approval
- Permit renewal process needs to be mapped as a flow chart
- Check list needed for permit application needs with submittal.

Following DWQ permitting process presentation:

- Definitions of wastewater/stormwater and how it applies by compost facility types
- Better guidance on time frame and permit requirements for private sector
- Cost estimates – major impact on facilities ability to operate – even start a business in NC
- Could a general DWQ permit be used for a T1/T2 facility?
- DWQ needs a central point of contact to then route a compost facility's application to the appropriate DWQ units (stormwater, land application unit, NPDES unit)
- General permit for composters?
- Checklist for applicants
- What mechanism is there to get applicants to know if, what permits are required
- Why does/is finished (?) product runoff considered waste water?
- Closed loop recycle definitions should be made clear.
- Overland flow of runoff – water does not go to ditches or ponds – how is this use to permit?
- Regulations for storage of finished compost. Once composting is and moved to sales sites, is a permit required?
- If the definition of rain water leaving finished compost becomes “waste” water, how can it be used on highways or any other place?
- Cost (total) of a stormwater permit (permitting fee and consultant fees, etc.)
- Explain general stormwater permitting process
- Time from start to finish
- Fees and costs for permits
- Legal definitions of the determination of waste water.
- Does reuse require a permit?
- Coordination of application flow in, through, and out of DWQ; routing of permits internally; resolving points of contact and capturing in a flow document.
- Make permitting paths more parallel than now.
- Would like to have a legal interpretation of the wastewater versus stormwater definition which is the basis of one debate (process water versus contact water)
- Coordination on permitting between Divisions was an obvious concern
- Method for coordinating with other agencies in the permitting chain.
- What about a DRC-type review of applications with all agencies meeting to review initial submittal?
- Agree on BMP's to mitigate
- Can NCDENR get a legal opinion on the definition of process water with respect to composting?
- NPDES requires reduction in pollutant discharge. Are stable organic compounds – humic and fulvic acids – pollutants. Blackwater streams are full of this with no adverse WQ impact!

Following defining the compliance boundaries presentation:

- Maybe this already exists, but if not is there a well-defined study* of hydrogeologic information for specific land areas, that would support or complicate land applications, establish go/no go zones for land applications to facilitate processing. * new subsurface mapping of watersheds is emerging (e.g. Florida spring-shed studies)
- Legal clarifications
- Is there flexibility in the compliance boundary at the surface?
- Define all boundary requirements on DWM and DWQ (Storm – Waste) permits
- When would monitoring well be required?
- I would like to solve the cost issues related to obtaining land application permits (hydrological studies, etc.). What are the costs for land application and what ones are applicable to composters.
- Clarification of what NC regulations versus EPA regulations really are
- Distinguish between ground water compliance boundary and surface water –still unclear where groundwater serves as base flow in receiving stream.

Q-Card (Questions):

1. Pallets sometimes have sides or floors of plywood or MDF. If not composted, can we accept in Type I facility?
2. What are the 9 elements that Ken mentioned make up a DWQ assessment (mentioned: types of feedstock, plans for leaks)?
3. When in the process is compost no longer considered a waste and is a product?
4. A pesticide question was brought up for Type I facilities. How would that be monitored?