

Legal Compost 6/16/08 stakeholder meeting

Summary of small group work from afternoon activity.

How to read this document:

- The type of facility is noted in bold at the top left corner above each grid.
- The suggestions for potential permitting categories/tiers are in yellow. This information is repeated in the grid for each type of facility.
- The numbers in the yellow boxes refer to the group number.
- Each ROW represents the work product of a different group, with the first row under each facility type representing group # 1, second row, group # 2, and so on in numerical order. If a box or row is empty it means that group did not discuss that permitting category or facility type.

Groups were encouraged to focus on the exempt and full permit categories and to spend time on facility types they were most knowledgeable about, and interested in. Groups were encouraged to create 'new' types of facilities. For example two new ones that were proposed are: community/communal (several homeowners/condo association, etc.) and farm service – where removal of manure to another site for composting is part of a farm’s nutrient management plan. Group # 3, as you will see below, took a different approach to establishing thresholds for levels of permitting. This group used the familiar animal units that is common in the ag community.

Backyard

	1 Register/Notify 3 Accept Ag practice 5 Registration 6 Notification	1 Cert I 2 Registration 3 USDA guidelines 4 Notification 5 Intermed Permit level 6 Registration	1 Cert II 3 Gen. Permit Ag. 6 Cat. Cert.	3 Gen. Permit N/Ag 4 Cat. Cert; Public notice	Full Permit 3 Ind. Permit Ag → 3 Ind. Permit non-Ag 4 Public comment 5 May or may n = A250
Material from on or off site origin, small quantity	N/a				
1-10 homes <20 cy imported/yr					
Non commercial On-site SSOW					
Residential, individual, Communal					
Education & awareness 5 cy on-site cap at any time; becomes "on-site" if > 5cy					
Single family/residential					

On-site

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N/a	5-99 cy	100-? Cy			What is threshold? 50,000 cy?
100 cy or less inc bulking material	>100 cy inc bulk mat	Sensitive location 500 cy inc bulk mat	Sensitive thresholds		Biosolids
< 20 cow nutrient equiv anything except sludge, biosolids, industrial waste		20-200 cow nutrient equiv same as exempt If violations- BIG TROUBLE		200-700 cow nut. Equiv. Address siting, water, air, C:N ratio; USDA guides	248 like; ANR permit & general req: traffic, public review, aesthetic, arch; exempt from 250
School, biz, hospital, etc.					
	Given guidelines (morning notes) .5 cy on-site capacity; Max. = 50 cy/yr ons-site; ~15cy food waste	Follow ACPs; site monitoring; > 50 cy total cap or 15 cy food waste			>1000 tons/yr of what they're generating on-site
<100cy unlimited amt of bulking agent		>100cy <1000cy	>=1000cy		

Agricultural

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High-carbon bulking agents exempt from 51% off –farm ingredients for determining non-farm activity	→ same	→ same	→ same	→ same	→ same
Follow Agency/Ag.					
	Small farm: <200 cows; < lots of chickens;< 200 cow nutrient equiv. Off-site inputs		MFO 200-700 cows; more chickens; <700 cow nut. equiv. inputs; Nutrient plan required		LFO: >700 cows; Beaucoup chickens Nutrient plan req.
Material generated on any farm is not SW, if meets AAPs		Large size			
<50cy off-site input	<200cy of any off-site input; (depend upon feedstock; >50cy off-site input	>200cy off-site; if have NMP, follow AAPs; (see morning notes); If off-site feedstocks, must follow ACPs ; Max. depends upon off-site feedstock 1000-5000cy/ acre–No consensus			>1000-10,000 tons/yr off-site input Bulking agent counted?
		On-site generated; on-site use; as per AAP	Off-site generated		As per AAP; LFO, MFO permits

Source-separated

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Develop list of acceptable inputs/products	0-99 cy Min land size TBD	100-3000 cy	3001	50,000 cy	50,000+ cy
	Low vol. & risk feedstock 20-50 cy/yr	Low risk feedstock Human pathogens Up to 250 cy/yr	High risk feedstocks 250+ cy Site sensitivity		Based on volume Very high
		0-200 cow nut. equiv.; No sludge, bio, indust.		200-700 cow nut. Equiv. Address siting, water, air, C:N ratio; USDA guides	
Post-con, vegetative mat only; small scale; No animal by products	Animal needs some regs.				
	<10% of total feedstock.	10-25% total feedstock	>25% total feedstock		

MSW/Biosolids

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N/a	N/a	N/a	N/a	N/a	Any size
					Also soil from bioremediation sites – eg fuel oil spill, contamina- tion from N-based explosives (firing range)
Single family composting toilets					
					Always
					Always
					Full permit, any size

Research & Development

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N/a	N/a	Pilots: approval by letter (to specify)	To 1000 cy		
		*** →	← Depends on scale →	← ***	
→			← Depends on scale; length of project; risk →		←

Yard Debris

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N/a	Any see BMPs	+ Food →	+ Manure →		
	Incl. dog & cat; trash; contaminants – need to determine how much is ok	→ Some level of cert; market potential decrease due to contamination			
<100cy	100-1000cy	>1000cy			

Chip & Grind

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Comment: 1. SW defin (veg waste) dictates ANR vs AG regs 2. What rules is it permitted under? NOT C & D					
When processed and not disposed					

General Requirements

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4 From state regs. No ex. from WQ, Air etc.					
Always required	BMPs Once off/change reporting	Water quality criteria BMPs, Min. land size→			
FORCE rpt requirements Educational/promotion materials	Conform w/provided checklist & recordkeeping	Same as notify W/reporting	Specific siting requirements		
If farm follows AAPs If low volume / acre					
Still need to follow ACPs but no monitoring; links with education					
Product remains on-site unless meets PFRP*		Need leachate plan; Meets PFRP	Need leachate plan; Meets PFRP		Need leachate plan; Meets PFRP

PFRP – process to further reduce pathogens

New proposed facility types:

Communal

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More than 1 family; non-community; may include SS food waste; bulk; manure; no dog & cat 0-20 cow equiv nutrient					

On Farm

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Inc on farm mortality No SW exemption if take SW→	Special regs–depends on # of mortalities→ →	→ →	→ →	→ →	

Commercial Mortality

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