

Participants responded to three questions, and provided the 'why' for their answers. The following is a compilation of responses and 'whys' for each question. (Duplication of responses omitted.) Following each question and the why responses to it you will find additional comments/concerns that participants made related to the question.

NOTE: All facilities, including those that may be exempt from permitting, are subject to general environmental protection requirements; no one is allowed to pollute or create a nuisance.

Several types of facilities are noted for possible exempt status and also as facilities requiring some permitting; other types of facilities are identified for some permitting and full permitting. Volume of material, type of feedstocks and location/site characteristics were the most noted criteria for determining whether a facility would be exempt, require notification, or if it would need a more formal permitting process and operation plan. The need for education – of operators, municipalities and the public – was repeatedly noted as an essential component to successful permitting. One group noted that some facilities (R&D sites) could make education part of what they do. One area where we still have work to do is in evaluating the risks associated with composting food scraps that contain meat and/or animal products. Variables to consider include: % of this material in relation to the total volume of the compost pile and the C:N ratio, (recipe); if cooked or raw (butcher residuals), if the material is ground up; and pile management. If you have additional thoughts to add to this discussion, or come across new study results on this (or other compost related topics), please forward them. Two other areas of concern that cross all permitting tiers are: quality assurance of finished products; and how to ensure that unsuitable materials (eg. biosolids, contaminated soil) don't end up on agricultural land. *Thank you!*

### Question #1

**What types of facilities/activities do we want to consider exempting from permitting; have notification only? Why?**

Backyard –

- residential
- communal: more than one family, non-commercial, from off-site, SS, bulky material, manure - <500cy

Onsite composting –

- from material generated on-site
- scale dependent
- feedstock dependent - no biosolids; no industrial
- on-site generated wood, yard, manure
- institutional – regs for large size facility
- small commercial/onsite – both on site generated and imported feedstocks, not a farm

Agricultural –

- as currently defined
- by farm size
- on farm w/ manure & bedding & other on-farm products (non-animal)
- same material as above but not on the farm – facility that takes farm generated material
- part of carbon management w/ own regs through another process – for onsite use
- can be produced on one farm and used/composted on another

Yard waste –

- up to a certain size
- clean, i.e. no dog or cat waste

Chip & Grind –

- scale dependent, or notification

Source separated organic waste (SSOW)

- scale dependent
- different considerations if it includes animal products / % of animal products

Small scale research

Research & Demonstration

Landspread

Clean wood waste

- forestry, mulch, trees & branches, sawdust, chipped wood, all untreated, lumber waste (no consensus)

## Question #1 - Whys

Poses acceptable – low/lowest - risk  
to environment  
water pollution  
relatively pathogen free  
small volume of nutrients  
few/ no contaminants

Volume threshold

Makes it easy for people

Low impact, small

BOD, small scale

## Other concerns/considerations for exempt facilities:

No big nuisance

Exempt from 10 V.S.A. Chapt 159

Scale:

if sell less than a certain vol. → exempt

low volume – limit varies by facility & feedstock type

if over X% moisture content → wet tons & under X dry tons

Imported woodchips and other clean high carbon material not a permitting trigger

Not marketing product

Exempt if following a set of criteria

Can be exempt from S. W. regs, but not exempt from all state regs

Successful backyard composting requires:

rodent-proof bins

awareness

education

promotion of new technology like green cones

TA for vector control (eg. bears, rats, coons, dogs, etc.) and pet mortality composting

Need to define

best practice

education needs

Regs required as scale increases

Limit town authority

For exempt activities towns may only require notification–not regulate.

For exempt activities SWDs may only require notification–no additional regulation

## Question #2

**What types of facilities might not require a full certification permit ? Why?**

Research & Development

- not size dependant
- size / time dependent
- feedstock triggers

Onsite

- depending on size / feedstocks
- institutional site– on-site gen. feedstocks & use on-site (ie. UVM)

Facilities accepting feedstock (small & medium scale), eg. farms getting food scraps from a school

A farm with on-site only generated feedstock & with a NMP in accordance with AAPs & is monitored on an ongoing basis is exempt from all other regs.

SSOW (paper/cardboard vs. food)

- feedstocks mix and type of facility determines level of regulation needed

Mortalities – facilities that take mortalities from other locations (livestock and/or roadkill)

Slaughter and butcher waste

Any meat (post-consumer)

Digestate from non-farm digester–depends on feed stock

Vermiculture

size/volume dependent

Chip & Grind

Yard Debris (TBD size)

Landsread (TBD size)

### **Question #2 - Whys**

Potential for nuisances, risk to water quality

Larger scale - oversight but not burdensome

Appropriate scale regs.

Pathogen issues – potential → prevent spreading →

Facilities Mgt

Invasive species, insects

General concerns about contamination in vegetative feedstocks coming onto farms

Potential (low) for worker health issues

Location

Opportunity for education & a relationship

Encourage innovation

Already enough oversight if general requirements and ACPs/AAPs are met

Incentive for doing good job & oversight when doing bad job

Farms need to be able to accept feedstocks from off-site & either use or re-sell and not need full certification

Community based oversight

Has potential to pose unacceptable risk

Siting & size considerations are important & should be determined by standards

### **Other concerns/considerations for facilities that are neither exempt nor require full certification:**

Have education component to permitting

Facilities that meet and comply with established siting & performance standards

All facilities undergo annual audits to remain in this category

Vermiculture is a tool for composting

Registration only:

If notification is coupled with education & raising awareness

Tell composters what is expected of them:

need to know risks

need to let the neighbors know

need to know when they've crossed the low volume threshold

If:

There are ACPs (monitored)

And is under a certain volume threshold

ACPs would specify siting requirements, standards & thresholds:

pests, odors, distance from neighbors, prevailing wind

### **Question #3**

**What types of facilities should require full certification? Why**

Bio-solids / sewage / sludge / municipal waste water (Not farm manure/digestate)

MSW - unseparated/unprocessed

Materials with heavy metals / toxins

Hazardous waste

Mega facilities (TBD)

- Over certain size
- Beyond certain thresholds
- Location
- Non-farm

Mortality

large scale  
ongoing (commercial)

Liquid food waste - Ice cream, whey, dairy

Food waste – If:

- post-consumer (no consensus about this yet)
- high volume
- off-site generated

Cat & dog waste

### **Question # 3 - Whys**

Elevated level of risk

ecological, nuisance, human, contamination  
pathogens  
odor  
water quality  
heavy metals  
concentration of nutrients  
toxins

Environmental risks unacceptable without increased oversight and safeguards

Location / siting sensitivity because of higher risk feedstock type/volume

Biosolids

pathogens  
public perception around safe handling of human waste and waste water

### **Other concerns/considerations for facilities that require full certification:**

Use Act 250 / Section 248 (Public Service Board process) type criteria as basis to make composting specific permitting process

Balance → encourage composting; need for regulation

MSW composting not recommended

Use multiple trigger points

volume/scale  
feedstock source / type  
site  
size  
assessment eg, location, soils, slope, etc.