

Comments from J. Coleman, Environmental Health Specialist, Benton-Franklin Health District

173-350-100 (Definitions)

I'm just curious why "**Agricultural Composting**" was created/defined to distinguish it from "composting". Is agricultural composting different from "regular composting" or is it just to distinguish the fact that it is occurring on a farm. It kind of seems like this may refer to land applying crop residuals???? Does "agricultural composting" meet the requirement of NOT simply being the "natural decay of organic solid waste under uncontrolled conditions"?

Crop Residues=I'm not sure I like the addition of "**unprocessed produce from storage facilities**". In my opinion this allows rotten onions, potatoes, etc to be hauled back to the farm and land applied. This may be OK if the farm is a long ways from residential areas BUT if farm is somewhat close to residential areas foul odors could potentially be generated which will cause lots of complaints. I dealt with this scenario recently. **I think this wording should be omitted OR have some sort of stipulation about where the unprocessed waste can go.....maybe only to compost facilities? In my opinion material that is typically coming out of storage is rotten or unworthy for sale in which case I think it becomes "solid waste" and should go to a permitted solid waste facility.** Some material goes to feed lots...but even that is kind of questionable....because wherever it goes it will probably create odors.

Table 320-A

(2). Again, I think we are allowing farms to store large amounts of potentially rotten produce for extended periods of time without any oversight. There could be vector attraction, leachate problems, and odor issues that would be difficult to enforce.

Table 410-A (Inert Landfill Exemptions)

(2). Allows for amounts up to 2,000 yds to be exempted so long as some specific requirements are met. I'm wondering if there should be some requirement regarding some city or county engineering dept person approving or OK that site is suitable and that proper compaction techniques be employed. I'm not really an expert but I'm wondering if there were big voids in the fill that it may produce a safety hazard at some point???? I've seen land owners (primarily farmers) use fill to make a road bed across a revine. It is on their property so maybe it doesn't matter??? Should we be concerned that the fill may settle and the road become hazardous or perhaps that culverts are not installed which may cause flooding /wash-out issues???