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See comments listed in uploaded file.

Organic Materials Management Rulemaking Questions

Contamination Threshold Limits

- What options at solid waste facilities should Ecology consider for preventing physical contaminants in food waste/other organic feedstocks and finished compost?
- Currently, a facility must reject feedstock loads that appear to have 5% or more by volume or else have a plan for removing contaminants prior to composting. Finished compost must have less than or equal to 1% by weight and not to exceed 0.25% by weight of film plastics.
 - How should the amount of physical contaminant be measured?
 - What is an appropriate threshold for contamination in incoming feedstocks?
 - What is an appropriate contamination limit in finished compost products?

Slaughter Waste

- Slaughter waste generators have found it increasingly difficult to find processing options for their material, prompting more generators to consider onsite management. This waste stream can cause significant impacts if managed incorrectly.
 - As Ecology reviews permit structures and existing permit exemptions, what factors would you like us to consider regarding slaughter waste?
 - How should on-farm slaughter fit in with agricultural practices?

Pre-processing Operations

- There are currently no specific standards for depackagers. As a result, depackagers are currently operating under the material recovery facility standards. Ecology proposes creating pre-processing standards for such operations and other organic pre-processing. One way to address such types of operations could be a minimum recovery rate that gets recycled.
 - What should Ecology consider as we develop standards for these facilities?

Recordkeeping and Reporting

- What level of recordkeeping and reporting should be required for various facility types, including exempt facilities if they export finished organics off site?

Training at Facilities

- Currently, facility supervisors responsible for daily operation at compost facilities must have specific training, and a trained supervisor may provide training for other employees.
 - What level of training, such as additional/on-going training, should be required, and what would be the desired outcome from such training?
 - What level of training should be required at different organic management facility types, including some under permit exemption exporting finished materials offsite?
 - If no certification or training for managing organic wastes via vermiculture or other organic management technologies exists, what would you recommend?

Permit Exemptions

- The current rule has conditional permit exemptions for several organic material management facilities. Some permit exemptions are in state law while others are instances where Ecology determined an exemption provides sufficient oversight. Only low risk operations should qualify for exemption. It is important that the rule creates a fair and equitable business landscape and neither overburdens exempt facilities, nor allows exempt facilities to excessively undercut standards required for permitted operations.
 - What new exemptions, if any, are desired?
 - What exemptions, if any, need revisions?
- Ecology sees a need for a permit exemption for yard debris drop off locations where yard debris is transferred to an organic management facility within a reasonable time. One type of drop-off location is a retail landscaping material yard where landscapers may bring full loads throughout the day for consolidation into a larger load. We are considering time and volume limits for this permit exemption to ensure materials move regularly to a compost or other type of processing facility.
 - What time limitation would be appropriate for this exemption?
 - What volume limit would be appropriate?

Other

- What requirements should be placed on digestate to be beneficially used (liquid and solids, combined or separated)?
- Ecology must update the definitions section of chapter 173-350 WAC with certain organic-related terms in statute.
 - What organic related terms would you like to see clarified or added to the rule?
- What other changes to the organic waste standards have we not considered?