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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?

It needs to start before the feedstocks get to the facility. Education, expectations.

Facility should be responsible to accept or reject loads they are capable of treating.

• 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.

o How should the amount of physical contaminant be measured?

This is difficult. Visual is 1st place. Measured i.e. weight or volume possibly only measures currently available?

It depends on what you are assessing, incoming or outgoing (finished). Incoming by eye based on the facility's capability. Out-going, I agree about weighting (need to dry in oven and scale as far as I know).

o What is an appropriate threshold for contamination in incoming feedstocks?

No absolute threshold should be mandated if it is source separated organics (other than excessive amounts that would require a dirty MRF permit). It depends on the technology used at the facility and the Operator should decide. They need to make quality compost. I think relying on end user needs could cause problems with the environment and % contaminants should not be based on end use.

o What is an appropriate contamination limit in finished compost products? Goal always being 100% contamination free knowing impossible. Also, end user dependent.

The existing limit should stay in place. Facilities have relied on this standard for investments made and unless its not working….

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.

o As Ecology reviews permit structures and existing permit exemptions, what factors would you like us to consider regarding slaughter waste?

o How should on-farm slaughter fit in with agricultural practices?

Is this not managed by Dept of AG? Seems like if they can't handle it, material in excess of what they can properly handle needs to go somewhere.

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.

o What should Ecology consider as we develop standards for these facilities?

The standard leaving the processing facility (depack + Digestion) to application should be the same as composting criteria?

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?

possible inbound and outbound tonnages – organics and residuals.

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.

o What level of training, such as additional/on-going training, should be required, and what would be the desired outcome from such training?

Current trained supervisor should be maintained. In the event that turnover exists, training must be a part of the onboarding process. Outcome: BMP's as well as regulatory compliance.

The primary, in-the-field operator should be certified through the weeklong training now offered. Refresher requirements should be minimized or not mandated unless regulations/requirements are changed. Training comes by doing and each site is different. Training takes employees away from the operation.

o What level of training should be required at different organic management facility types, including some under permit exemption exporting finished materials offsite?

Full knowledge of regulatory requirements. BMP's training

o If no certification or training for managing organic wastes via vermiculture or other

organic management technologies exists, what would you recommend?

Explore minimum training requirements even when operating as exempt status. We are curious if there is a current problem.

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.

o What new exemptions, if any, are desired?

o What exemptions, if any, need revisions?

Exempt facilities working under agricultural exemptions.

• 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.

o What time limitation would be appropriate for this exemption? Consideration must be given to exposure to elements – mainly stormwater as well as odors. Volumes must be a consideration as well. Possible scenario, customer drops material on ground, operator within certain timeframe – sooner than later – loads in containers waiting for transport to end processor. Possibly needing the tip floor possibly covered or on solid surface.

o What volume limit would be appropriate?

Not sure of a volume limit. Volume is established by site capabilities. Grass should not be held longer than say 3 days? Brush, weeks?

Collection site should have an established outlet that somewhat controls the amount of material and timing they can handle.

Materials must be transported to a fully permitted composting facility.

• What requirements should be placed on digestate to be beneficially used (liquid and solids, combined or separated)?

Digestate by definition is no longer a solid waste as long as it is used at agronomic rates. Maybe meet compost if available for general use or biosolids requirement is used on farm.

Dry digestate, I believe, needs to meet compost quality standards if used off site.

• Ecology must update the definitions section of chapter 173-350 WAC with certain organicrelated terms in statute.

o What organic related terms would you like to see clarified or added to the rule?

The term Material Recovery Facility, as noted in Depack above. This is not a problem except that NAICS codes require $500/PFAS testing for MRF and it is not clear if a depack is/was considered a MRF when the mandate for PFAS testing was adopted.

• What other changes to the organic waste standards have we not considered