

Comments from the Washington State Department of Agriculture livestock composting project regarding updates to WAC 173-350 Solid Waste Handling Standards pertaining to Organic Materials

WAC 173-350-100 Definitions

- Recommend defining “Routine Livestock Mortalities” and “Animal Mortalities from disaster, disease die-off, and mass culling events” separately
- Recommend adding a definition for “Agricultural Land” - consider aligning with definition in [WAC 365-190-030](#)
- We appreciate the definition of “meat processing waste” and its use in lieu of slaughter waste

WAC 173-350-220 Composting Facilities

- **100-2 Composting facilities – Permit exemptions**
 - Recommend adding clarification that “material on-site at any one time” specifically does not include bulking agents
- **Table 220-A**
 - **Exemptions 1 & 2** – clarify whether bulking agents need to be generated on-site or not
 - **Exemption 4** – please maintain at least 250 cu yd volume for exemption at any one time, consider 2500 cu yd annually
 - **Exemption 4** – specify that while materials must be generated on-site, meat processing waste resulting from livestock processed on-site did not have to have been raised on-site
 - **Exemption 4** – exclude bulking agents from the volume limits, would be open to consider only allowing this exclusion for some bulking agents such as “clean wood waste”
 - **Exemption 4** – could there be an exemption for meat processing waste from animals raised on site, but slaughtered/butchered off-site? (would allow farmers & ranchers to bring back their own wastes?)
 - **Exemption 8** – Is there a standing list of methods approved by WSDA and the state vet – or will this approval be needed on a case by case basis? - Recommend a standing list of approved methods.
- **Table 220-B**

- Recommend requiring testing for Fecal coliform rather than allowing Fecal Coliform or Salmonella

WAC 173-350-220 Other organic materials handling activities

- **Table 225-A**
 - **Exemption 5** – appreciate this general exemption
 - **Exemption 6** – appreciate this exemption and especially the allowance for land application when approved and overseen by WSDA