WSDA - Livestock Composting Project (Sarah Lemon)

Please see the attached file for comments from the Washington State Department of Ag's livestock composting program.

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

<u>WAC 173-350-220 Other organic materials handling activities</u>

- **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