

zerman and anne whitley

We are disappointed in the efforts of DOE to place loopholes in the ecology program for pre-processors and for processing organic waste at the source.

For one, depackaging is not regulated or adequately defined. Depackaging by pre-processors are exempt from permit requirements conditions if integral to a compost or anaerobic digester facility which allows way to much freedom for those operations to ignore your rules. These pre-processors can take whatever they want, recover as little as necessary, and landfill the rest including recyclables which we have seen too many times.

Two, setting up this 5% rule is also a problem since it will ensure that pre-processing system receives more solid waste from sources without adequate rules for processing. It will allow customers such as grocery stores to stop removing food waste from its packaging at the store or distribution center because it will be economically attractive. These are likely to have been source separating food waste for diversion to composting for many years.

Please incorporate the rules for source separation that are being propagated by the state of Vermont that ensure that composting is viable without the associated hazards of landfills.