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Subject: RE: Part 115 - Compost Issues
Date: Wednesday, January 10, 2018 6:19:53 PM

Hi Duane,

We at Emmet County support allowing food waste in compost facilities. If compost sites are well managed we do not think there needs to be a limit on the amount of food waste other than what good management and proper C:N ratios require. Setting arbitrary percentages is not good science or prescriptive for good management. Our compost quality has improved since including food waste in our compost facility. However, raising the amount of food waste in small to medium compost sites to 10% if the DEQ allows higher amounts on a case-by-case basis could be workable, as long as there is guidance and encouragement to grow these programs, rather than limit their growth. We also recommend increasing the size of medium sites up to 10,000 cubic yards (that's still not very big), as we have already submitted in our previous comments. We also strongly support no limit on the amount of food waste at large sites recognizing they will be under general permit requirements and getting annual inspections to ensure proper management.

It is very important to keep in mind that increasing organics recovery via composting is critical to moving the needle on recycling rates in Michigan, and any changes in the statute need to support the growth of the compost industry, not thwart it. It also is important to recognize the importance of providing encouragement, guidance, and support for community-scale and community-run compost operations in order to increase access in the state, in addition to the current focus on developing regulations for large sites, in order to greatly expand access and increase recovery.

Comments about the extreme cold weather impacting compost facilities is irrelevant for well-managed sites. There are numerous northern states with successful compost facilities accepting food waste, including Vermont, Minnesota, Wisconsin, and others. We reached -27F last week in northern Emmet County and our piles are steaming. Composting in Michigan is not in its infancy, it's maturing and needs to be encouraged and guided and expanded

We have plenty of comments on the other bulleted items on your list, so please keep us in the loop

to further this discussion.
Thanks for your continued work on this.
Best,
Elisa

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Subject: Part 115 - Compost Issues

All, while reviewing the comments related to composting I ran across a couple of topics where suggestions were all over the place and I am looking for your comments.

- Amount of food waste that can go to compost sites –
 - Small and medium sized sited (less than 5,000 cubic yards of compostable material) are limited to 5% food waste. We've had suggestions of raising this to 10% to placing no limit. Would everyone be comfortable raising this to 10% and allowing the DEQ to go

higher on a case by case basis. I imagine we would require these sites to develop an operation and odor management plan similar to the sites that get a GP.

- For the large and very sites (over 5,000 cubic yards) the statute says that they can only take 5% food waste but with these sites getting a general permit (which requires an operation, odor management, training, and marketing plans) and getting annual inspections by the DEQ. For these sites we propose no limit on food waste or other class 1 compostable material.
- Size limits on who reports, registers, or gets a general permit –
 - As drafted sites with
 - less than 500 cubic yards are exempt
 - from 500 to 1,000 must notify
 - from 1,000 to 5,000 register
 - over 5,000 get a general permit
 - 2016 volume report indicates the following:
 - 18 sites under 500 cubic yards
 - 5 sites between 500 and 1,000
 - 32 sites between 1,000 and 5,000
 - 51 sites between 1,000 and 10,000
 - 30 sites over 10,000
 - As drafted 54 sites would need to notify or register and 49 sites would require a GP. Which means we would be doing yearly inspections on about half the sites. It has been suggested to raise the volume to 10,000 for those that get a GP. This would mean that less than 30% of the sites would be inspected yearly. Of course, the ability to do any inspections would ride on getting sufficient funding to run the program.

If you've read the comments on composting you will see that there is a lot of discussion on:

- Registration of finished compost as a fertilizer/soil conditioner
- Water management at compost sites
- Financial assurance
- Complying with material management plans/local zoning
- Moving a number of technical issues into rule making
- Fees/funding

Please let me know if you have any comments/suggestions on the questions raised above. I plan on getting together with the Water Resources Division and the Michigan Department of Agriculture and Rural Development in the future to discuss the issues listed above and will keep you in the loop in case you want to join the discussion. Thanks.

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