

## WWA Stormwater Manual Modification Comments

| Volume | Section    | Page   | Comment  |
|--------|------------|--------|--|
| I      | Appendix G | G8-9   | Definition of Composted Material: The term appears to inadvertently exclude compost that is manufactured at a compost facility permitted under 173-308 WAC, which is Ecology’s biosolids rule. We recommend the following revision to the definition: “Composted Material ( <b>compost</b> ). Organic solid waste that has undergone biological degradation and transformation under controlled conditions designed to promote aerobic decomposition at a solid waste facility in compliance with the requirements of Chapter 173-350 WAC, <b>or biosolids composted in compliance with Chapter 173-308 WAC</b> . Composting is a form of organic material recycling. Natural decay of organic solid waste under uncontrolled conditions does not result in composted material.”   |
| V      |            | 7 7-18 | We recommend eliminating the feedstock restriction for composts used in bioretention (BMP T7.30) and BMPs that reference the bioretention specification (e.g.: BMPs T5.14 and T7.40). Rather than use feedstock as a surrogate for compost quality, we recommend that Ecology write specifications for pollutants of concern (e.g.: available phosphorus limit or range). Feedstock is a poor indicator of compost quality as it often has little to no bearing on the compost quality and final chemical and biological parameters of the finished compost as there are numerous factors that affect these parameters (e.g.: compost age, stability, maturity, particle size, composting process, relative availability of carbonaceous material, etc.). The Northwest Biosolids Management Association is unaware of any peer reviewed scientific literature indicating that the exclusion of manure and biosolids feedstocks from a compost mix will yield a better performing compost product in bioretention systems, raingardens, compost amended vegetative filter strips, and similar technologies. Feedstock is likely not only a poor way to specify compost, but it also has the potential to make several low impact development BMPs infeasible to jurisdictions in more remote areas of the state. For example, City of Port Angeles recently informed us that they need to import compost from over 100 miles away to find compost that meets the feedstock requirements in BMP T7.30. If Ecology were to set specifications based on potential pollutants of concern, composters throughout the state would have the opportunity to create special products designed specifically for stormwater treatment. While composters are often able to adjust their process and feedstock ratios, they are often not able to eliminate a feedstock altogether. |
| V      |            | 7 7-18 | BMP T7.30 describes specifications for compost used in bioretention and references several TMECC methods. We noticed several reference errors as well as omission of units in this section. We recommend Ecology carefully review the TMECC standards to ensure accuracy in this manual.   |

- V 5 5-10 We agree that post construction soil organic matter content requirements can be achieved using a variety of materials (BMP T5.13).
- V 5 5-43 We agree that dispersion areas should use BMP T5.13 (post construction soil quality and depth).
- V 5 5-10 BMP T5.13 specifies the maximum amount of organic matter that the compost can contain. We are unaware of a reason for using a maximum and recommend that Ecology amend this specification to read a minimum of 40%, which is the specification used in BMP T7.30.