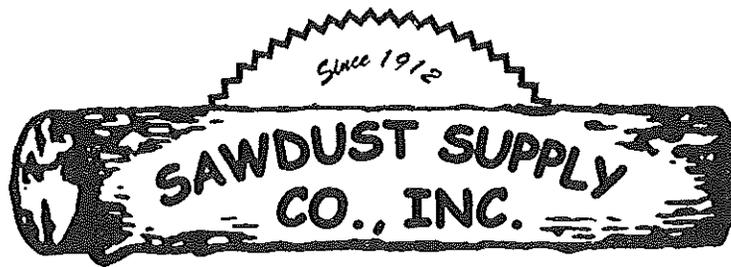


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DEPARTMENT OF ECOLOGY

OCT 07 2014

WATER QUALITY PROGRAM

October 2, 2014

Municipal Permit Comments

Washington State Department of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Re: 2014 Permit and Stormwater Manual Comment Period

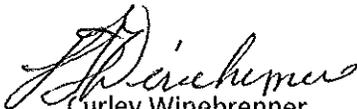
Thank you for the opportunity to review and comment on your draft Stormwater Management Manual for western Washington. As a topsoil manufacturer and composter in western Washington, we understand that soil with good structure and plenty of organic matter will lead to less stormwater runoff and cleaner water in our region's rivers, lakes and Puget Sound. We applaud Ecology for requiring post construction soil amendment, and for allowing a range of products, containing multiple feedstocks for this purpose. There are, however, areas of the draft manual we believe need revision immediately. These include the definition of composted material and feedstock restrictions associated with compost used in bioretention and rain gardens.

The current definition of compost indicates that the product must be made in accordance with WAC 173-350, however, Ecology also permits the manufacture and sale of compost under the states biosolids rule WAC 173-308. We recommend that the stormwater manual reflect this regulatory nuance and instead read "Organic solid waste that has undergone biological degradation and transformation under controlled conditions designed to promote aerobic decomposition at a permitted facility in compliance with the requirements of Chapter 173-350 WAC or 173-308 WAC."(Volume 1, page G-9).

The current specifications for compost in BMP T7.30 (Bioretention Cells, Swales and Planter Boxes) and BMPs that reference BMP 17.30 (e.g.: rain gardens) specifically prohibit the use of compost containing biosolids or manure. What is Ecology's rationale for this wholesale discrimination? We know of no scientific literature that has found feedstock to be a predictor of compost performance in bioretention or rain gardens. Nor do we know of any scientific literature that finds compost containing manure or biosolids to be potentially harmful in comparison to compost containing yard and food waste, as is currently specified by Ecology (see attachment). This feedstock restriction is unfounded and unfairly selects for specific yard and food waste composts available in the Seattle and Tacoma areas. This unfair selection is made obvious by the fact that post-consumer food waste is allowed but pre-consumer food waste is not. If Ecology is concerned about the potential movement of nutrients or pollutants from composts, it makes far more sense to set specifications for those concerns, rather than write feedstock restrictions. Feedstock is a notoriously poor indicator of compost quality and performance.

Thank you again for the opportunity to comment on the draft stormwater manual. If you have any questions about these comments please direct them to Curley Winebrenner at 206-622-4321 or groco15so@aol.com.

Thank you,



Curley Winebrenner

Manager

GroCo, Inc.

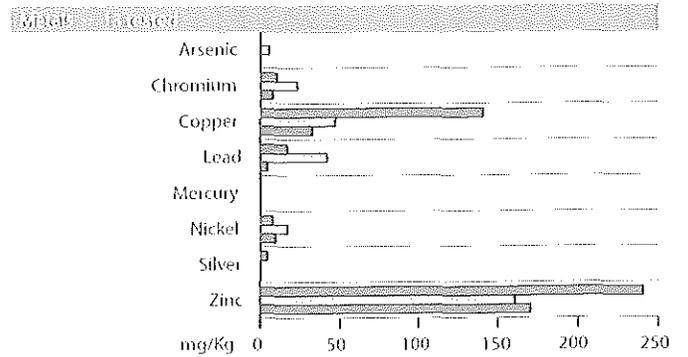
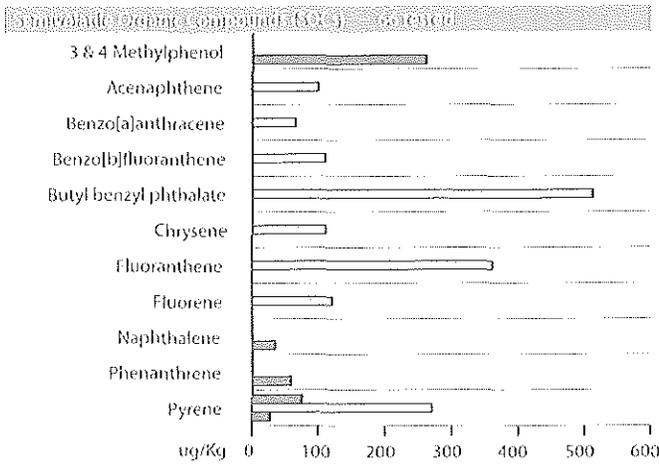
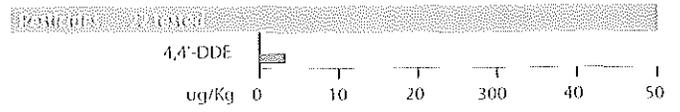
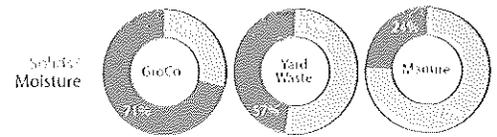
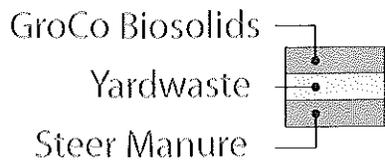


Troy Peters

Manager

Sawdust Cubby Co., Inc.

COMPOST TYPE



An independent lab tested for 17 metals and compounds including 126 EPA priority pollutants. Testing was done by dry weight. Illustrated above are the only constituents that were detected above the reporting level for one or all of the samples.

