WASHINGTON ORGANIC RECYCLING COUNCIL

8524 W. Gage Blvd., Building A-1, #242
Kennewick, WA 99336
organicrecycling.wa@gmail.com
www.compostwashington.org

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Municipal Permit Comments
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Comments on Department of Ecology's Stormwater Management Manual for Western Washington

To Whom It May Concern:

The Washington Organic Recycling Council (WORC) is a nonprofit corporation representing the organic waste recycling industry in Washington State and is comprised of 50 private composting facilities, support industries and public agencies. We have a few general comments on the State's Stormwater Management Manual for Western Washington where various references are made to compost used under the Best Management Practices for general soil amendment and bioretention soil amendment purposes.

Feedstock Restrictions on Compost for Bioretention

For BMP T7.30 and other sections that reference this BMP for compost specifications (T5.14 and T7.40) we recommend that Ecology move towards a performance-based standard for compost instead of assuming feedstock selection will deliver the desired surface water runoff quality protections. A performance-based specification would entail setting laboratory-verified ranges or maximums on the pollutants of concern in the finished compost and bioretention soil mix. This should lead to more predictable performance than using feedstock as a surrogate. In addition, there are several areas in Washington State that may have difficulty sourcing compost that only contains the approved feedstocks of: yard debris, crop residues, post-consumer food scraps and bulking agents. There are several other feedstocks that composters use (such as manures, food processing wastes and biosolids) and this restriction would mean that even if a prohibited feedstock is used in very small quantity, the finished compost is prohibited from use in certain BMPs.

We understand that this would require a science-based technical consensus on which test methods to use to evaluate pollutants of concern, and what limits to place on those pollutants by those tests. We recommend that the Department of Ecology lead on developing that technical consensus, to create standards useful for all bioretention compost and soil mixes.

Specifications for Compost Quality Testing for Bioretention Soil Mixes

Please check the test methods and references for all compost quality testing requirements listed in BMP T7.30. King County is submitting separate comments that identify incorrect test names and missing units in the bioretention compost specification.
Regarding the pH specification for compost in BMP T7.30, it currently allows lime or iron sulfate to be added to the compost to adjust a pH outside of the acceptable range 6.0 – 8.5. This chemical addition may mask problems associated with immature compost. A pH range of 6.0-8.5 should easily include all mature, stable composts, so WORC recommends that this chemical modification be deleted from the specification.

Compost Definitions and Regulatory Citations

In the Volume 1 Glossary, there are redundant definitions both for compost and composted materials. We recommend replacing the "Compost" definition with the amended definition below from "Composted Materials", and removing "Composted Materials" and "Composted Mulch" from the glossary and all BMPs. In the BMP texts, replace "Composted Materials" with "Compost" and "Composted Mulch" (e.g. Vol II p 4-90, Vol. III p3-29) with "mulch"or "coarse compost" as appropriate. Since composting may include organic materials that do not fall under Solid Waste rules, delete the definition of compost as "solid waste". Currently all these definitions only refer to WAC 173-350 and not the compost produced in accordance with WAC 173-308. Because the manual references use of biosolids compost, and biosolids are not defined as solid waste (per 308 rule), and may be composted equally under 308 or 350, our suggestion is that the definition of compost be modified to include a reference to 308. Our proposed revised definition:

> "~~Composted MaterialMulch~~ **Compost** Organic ~~**solid waste**~~ **material** 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, or biosolids composted in compliance with Chapter 173-308 WAC. Composting is a form of organic material recycling. Natural decay of organic solid waste under uncontrolled conditions does not result in composted material. "

All composts should be available for use in general landscape amendment under BMP T5.13 Post Construction Soil Quality and Depth. Additional feedstock or pollutant-of-concern testing parameters should be applied only to bioretention soil mixes and related BMPs designed as treatment for concentrated flows, with high compost percent in mix and high flow-through volumes.

Evolving Specifications

Finally, it may be advisable to place rapidly evolving specifications such as those for bioretention soil (both the aggregate and compost specs) in a reference document separate from the

Stormwater BMP Manual rather than within the BMP itself. It would seem that such reference documents can be updated more frequently than the entire Stormwater Manual itself which involves a lengthy review process.

Thank you for the opportunity to submit comments. Please feel free to contact us if you have any questions.

Sincerely,

Dan Corum, President
Washington Organic Recycling Council