COMPOST OPERATION STAKEHOLDER ADVISORY GROUP MEETING
Commons Building – Wake County Office Park

MEETING MINUTES

WEDNESDAY, FEBRUARY 17, 2010

1:00 PM WELCOME BACK & OPENING: Ken Pickle (DWQ)

1:10 PM REVIEW OF LAST MEETING AND PREVIEW OF MEETING: Dave Halley

Review of questions after each presentation from last session.
Common Themes:
-Timeline
-Definitions/Legal Definitions
-Cost Estimates
-Coordination
-Central Point of Contact
Lots of questions more than issues. Might need a Q&A sheet.

Overview of today's agenda.

1:20 PM RESPONSE TO LAND APPLICATION STAKEHOLDER QUESTIONS: David Goodrich and Jon Risgaard (DWQ – Land Application Unit)

David Goodrich – Handed out a 2 page PowerPoint to review.
(Please see document on Portal – Land Application Unit Q&A 2-17-10)
Rules will of course give a better review of points in these questions
Jon Risqaard- Comment on variance issue – variance would be granted on a case by case basis.
Frank Franciosi – Closed-loop recycling, currently we have the wastewater which we recycle onto the piles. For this you're saying we do not require a permit.
Jon Risgaard – If it already in your permit manual we would not require you to have an additional permit.
Michael Scott – There was confusion on this point concerning the City of Durham's compost permit. I think we made good headway on this last meeting.
Bob Rubin – I think it would be helpful as a recommendation from this group that facilities develop some sort of water management plan. The second is if you're going to market a product as meeting a PFRP and you going to reapply a liquid that has come off this process your PFRP comes at the end of this process. I think this process needs to be very clear.
Michael Scott – We spec that out in the ops manual.
Allen Hardison – I hear this discussion and I see where this says it must be under roof
Jon Risgaard – If you're recycling this water as long as you have it in your permit you're okay.

1:30 PM LEGAL REVIEW AND OPINION REPORT: Craig Coker (NCCC) and Ken Pickle (DWQ)

- What questions did we ask our legal counsel?
- What is status of review?

Ken Pickle – First I've forgotten two bits of business. Since the beginning of this process I have been responding to questions based on how we've handled things since 2006. Second bit of business is we have some new folks here I'd like to introduce – Amy Brooks and Chonticha McDaniel.

Have sent the questions on to our legal counsel but unfortunately did not receive a response yet.

List of questions to attorneys:
Issues
Legal definition of runoff from compost piles?
Is it wastewater or stormwater?

Not at Issue
Not an issue with non-contact stormwater – water that hits the roof of the buildings and runs off

Craig Coker – had our attorney J. Thomas Spiggle, Esq.
NCC Legal Research
Does NCDWQ have a basis in law to find that a) runoff from finished compost or b) from the composting process is wastewater requiring an NPDES permit?
What options exist?
Liability?

Received legal review on 2-16-2010
(See document on Portal)

Answer regarding liability is a concern. The issue regarding calling it a wastewater or stormwater is a bigger liability issue to the compost industry. This is why I recommend we stay with calling it a stormwater.

Lindsay Roberts – you were saying truck traffic?
Craig Coker – People can be aggravated by many things, once aggravated this is another vehicle by which they could see some other action against a compost facility.

Ken Pickle – We do not have our attorneys' opinion right now and we have no rebuttal. The attorneys doing this work are not available this week or next week but will be available the week after. Had 2 introductory meetings over the phone with them and had one meeting after. We certainly will make the next date.

Work will be done by Kathryn Cooper, Deputy Attorney General, NC Dept. of Justice; and Anita LeVeaux, Assistant Attorney General. LeVeaux recently dealt with SunGro's petition on the NOV issued by DENR Washington Regional Office.

Scott Mouw – Looking for the slide you and industry agreed that Leachate is a wastewater. Would like to throw that out to the group and make sure this is in agreement.

Craig Coker – We define Leachate as a free water draining out of a composting pile and by rainfall infiltrating into and through a pile. We agree that the Leachate is something that needs to be managed properly

Scott Mouw – this seems to be in agreement
Joe Hack – I have a bit of a disagreement with this statement. If you're going to take that leachate and add it back to your pile I think it should be seen as process water because it will be reused in your process. It should not be called a wastewater until it is no longer going to be used in the process.
Ken Pickle – all sorts of industries have process waters and closed loops with those waters and we do not consider that wastewater until it leaves the process and enters groundwaters
Jon Risgaard – I don't think that it's clear to say that any water that remains in the process is true process water, need to make sure this is managed correctly
Dave Halley – why the argument to call it rainwater (stormwater) instead of wastewater
Craig Coker – what has been said in NC in the past by State regulators in the past is that compost facilities managing wastewater would have to build a line into the sewer, drain into a proper wastewater pond
Ken Pickle – on the legal issues I am very apologetic we do not have a legal opinion

Jason Watkins – question speaks to Craig's legal opinion here but have to put it out to your DWQ opinion, from a penalty standpoint according to the Clean Water Act does it matter if it's a wastewater or stormwater
Bradley – under the Clean Water Act there are NPDES requirements for wastewater and stormwater, they both have the same things associated with them
Dave Halley – even though you call it rainwater there still may be liabilities

Ken Pickle – Any other questions we need to take back to the attorneys?
Bethany Georgoulias – You talk about rainwater hitting a pile and rainwater infiltrating a pile, on any day in the field how do you determine this
Craig Coker – On a dry day it's fairly easy. During a rain event the piles become very saturated and the piles act almost like a sponge.
Frank Franciosi – My experience is that during a heavy rainfall the piles will absorb the rain for the first 30 minutes than sort of crust over and the rest runs off. If it's a steady light rain this could be slightly different.
Ken Pickle – how do you know what the quarter inch is flowing down that windrow?
Jennifer Jones – comment about Mr. Spiggle's opinion that finished compost as posing no threat to the environment. I think that is up for debate. Composting soils were found to have increased infiltration rates
Frank Franciosi – could look at bio-retention rates from other states, we can argue that point back and forth. Over the first month you may get increased rates but after that it will be decreased.
Jennifer Jones – not saying other states don't incorporate compost bio-retention rates ever, do need to balance rates and runoff

2:00 PM **2006 RULING: Ken Pickle (DWQ)**

- What data did we use to support the 2006 ruling?

Ken Pickle: Values here are very real. When looking at a page of data you don't know what preceded this you just see the numbers.

DWQ Report #3 to COSAG (document posted on Portal)
Yard waste results are generally at the lower end of this.

<u>Mecklenburg Co. Compost Central – Joe Hack's facility</u>

-BOD pretty good across the years – some values extraordinarily good
-WWTP supposed to get 30mg/L so some of these values are better than raw sewage
-200 mg/L for COD
-35 mg/L is acidic cannot go above this – these are pretty good numbers for Ammonia
-pH, Oil & grease no issues
-TSS – most significant pollutant in NC in general – most values less than raw sewage but not as good as treated sewage

Joe Hack – Large Type I, roughly 40 acres paved, processing 80,000 tons per year, Compost Central is split in the center by a surface water feature, goes through natural vegetated area, sample is collected at first point it converges
Jon Risgaard – how are these samples taken
Joe Hack – it's in accord with the rainfall event – would have to look at our records
Ken Pickle – it is established in our rules
Stacy Smith – Add a column on a right that gives the measures that Ken asked Sergei

<u>Brooks Farm Composting Facility</u>

- In 1998 data was not collected per standard methods. Lab notified consultant you didn't keep it chilled, consultant said run the tests, and Brooks reported that. Consider 1998 numbers as not precise and maybe even throw them out
- In 2003 consultant reported he collected the sample in a ditch – not per standard methods. Second sample in 2003 was so off the mark doesn't deserve the consideration.

- pH is good, fecal pretty high, COD high

Craig Coker – where is the compliance point to this permit?
Ken Pickle – it's up the point where the flow enters the receiving pipe or where the flow leaves the facility
Craig Coker – is this collected on the facilities or when it leaves the facility
Ken Pickle – our permit requires it to be collected when/where it leaves the facility

Wallace Farm Composting Facility (Type 3)

- first permit where DWQ separated wastewater from stormwater
- BOD and COD very good, fecal pretty good numbers, no testing on Ammonia, no problem with pH, would like to see better performance on suspended solids
- Wallace is just starting, we only have two data points from him
- Wastewater now being send to CMUD and stormwater to pond

Joe Hack – CMUD is now CMU – didn't like the "mud" in their name
Michael Scott – facility said they're very happy with their discharge
Joe Hack – since the Wallace data is very different from the other facilities the table header should probably be clearer saying this water did not contact process materials
Ken Pickle – you are correct in this presentation that does not jump out
Craig Coker – can you characterize where the stormwater comes from on this facility permit
Ken Pickle – (describing Wallace facility using site plan) all areas flow down to the pond, lift station pumps out immediately sends on to CMU, areas that flow to this pond are mixing pit, storage building, bins; we have grass, vegetative mounds of topsoil. Key thing is we were able to segregate this out and call it stormwater because there was no contact with windrows. We're absolutely tickled about Wallace.
Lindsay Roberts – could you put Wallace's benchmarks for performance on another column on this document
Craig Coker – how are these benchmarks established
Ken Pickle – benchmarks established by our environmental scientists in another unit. When somebody discharges waters to the waters of NC how clean do we want them to make it
Bethany Georgoulias – BOD and COD are set at secondary treatment level.
Ken Pickle – in a stormwater permit it is not a compliance violation issue, if he gets one exceedance his obligation is to do a walk-around on the site to see if he can find the problem. If there is a second exceedance he must go to monthly monitoring instead of quarterly and that there might be a problem and we need to get on it. Particularly in stormwater this is a lot less burdensome than a wastewater permit would be. We wrote the language in Wallace's permit to give DWQ the freedom to go out there and say it's because you're piling compost there and you need to move that. On the other end of the spectrum we have a food processor that processes sausage, if they have 4 exceedances we go out and see the facility. We have the freedom to relieve them from monthly monitoring. We're trying to engage the industries in meaningful management of the facilities.
Frank Franciosi – is that just a general use permit
Ken Pickle – no this is a specially drafted permit
Bethany Georgoulias – benchmarks are pretty even across the board
Ken Pickle – we have a little more stringent benchmarks in certain situations. For 12-15 years our unit's been requiring facilities to have stormwater pollution prevention plans. We've moved that requirement to the permits to require them to manage the stormwater. Treated it like a building permit originally – jumped through the hoops one year and don't have to think about it for 30 years. We don't want stormwater handled that way.

In 2006 we had the Mecklenburg and Brooks data. We did have the Clean Washington Center study data in hand and had an emotional reaction to it.

Oregon study by CH2M Hill

- Data combined straight out of that study
- What they call compost stormwater is unclear

SunGro

- Data needs to be interpreted very carefully, facility is only on one side of the creek
- Tough to make sense out of the data due to physical circumstances
- Fecal coliform – too numerous to count

Michael Scott – what's interesting is you're attributing that fecal coliform to pine bark and peanut hulls, it's a Type II facility that wouldn't take feedstocks with a high level of pathogens. With the fecal counts I would struggle with these fecal amounts.
Bob Rubin – if you want to determine if the impact is from humans E. coli is a better factor than fecal coliform. If concern is human pathogen you might want to look that the testing is of human origin.
Sergei – there is other testing that can be done to determine the source of this fecal
Ken Pickle – well look at the last column on the chart here, the DO does not meet the standards, pH is not so bad
Jason Watkins – couple clarifications, your sampling here what are your ranges upstream and downstream
Ken Pickle – upstream you could throw a rock to it, downstream the sample point was where it comes into the creek, upstream and downstream are sampled in the creek
Jason Watkins – what was the usage across the creek
Ken Pickle – part was cropland
Michael Scott – cropland, farmland, woodland
Bob Rubin – Tanglewood Farm is down the road
Ken Pickle – again it's tough to make too much out of this data, that's part of the reason we go to end of pipe for this data, rather than up and down cause you don't know what everyone else is doing. It's your flow – you don't want to be responsible for anybody else's.
Jennifer Jones – are you suggesting we should be testing for salmonella, E. coli, and all those others
Bob Rubin – Need to recognize the limitations of fecal coliform. This sample was taken on August 19th and water temperature was enough to support BO of 4?
Ken Pickle – that's a reasonable question on this
Michael Scott – one other footnote is that there were violations from both Divisions (DWQ and DWM), so there might have been operational issues with this facility at this point in time
Ken Pickle – we knew this facility was out of compliance at time of this sample so it might not be the best example
Frank Franciosi - Test showed a high pathogen number when bio-solids, manures and or food waste was not being composted. I think this points out that that maybe there may be a discrepancy in how samples were taken or maybe it was from something from another source, not this facility.
Joe Hack – with respect to fecal coliform I believe you've revised the general permits for landfills with regards to fecal coliform and most of them are having trouble meeting this
Ken Pickle – we are having trouble with , we know fecals are hard to interpret, we know at landfills you're going to have seagulls but we couldn't not test for it
Bethany Georgoulias – Regional offices have worked with this to bring that under control
Craig Coker – one thing that's obvious after looking at these four datasets is the large variation in data which brings up the fact that there isn't enough data on this runoff. If the State's going to impose regulations on this I think there needs to be better monitoring to have more results.
Ken Pickle – this is a very small data set however we cannot pretend that it's not there
Scott Mouw – I think it'd be good to check in with the group is there some consensus around the basis for concern. A product of the group could be that we recommend increased monitoring at ALL compost facilities – possible consensus point.

Consensus Point – As a group, do we think we should recommend increased monitoring at all compost facilities?

Joe Hack – has an issue with "all" think it could be a cost effect on the compost industry as a whole. Since the State gets $2 per ton I think the State should offer some money towards the monitoring. Select a few facilities rather than spreading the cost across the industry.

Scott Mouw – Yeah, there's a need for science but long-term there's a need for better monitoring of all facilities. You agree as long as we agree which facilities would do what kind of monitoring
Dave Halley – You agree that there could be a phase-in period for the monitoring of facilities
Frank Franciosi – I think you're better increasing the sampling and getting more data points
Jeri Covington - Clarification with respect to facilities that are not standalone compost facilities but those incorporated into other permits such as a landfill permit? Doing the data points, because of the variation in facilities getting more data, doesn't necessarily yield that all facilities of that type will be similar. If you look for volunteer sites to do this I'm sure you could get some to volunteer to make sure the rules meet their needs
Frank Franciosi – that suggestion was brought to the table back in 2007 – we had four facilities willing to do sampling for this reason. More details on type of testing
Jennifer Jones – I would support what Frank just said and does the Composting Council have access to more data across the country so we don't have to repeat
Jon Risgaard – What we have strictly looked at is for runoff on these sites and if we're monitoring and sampling we need to do this for groundwater also
Lindsay Roberts – need to have matrix for data and sampling, would feel better with everyone participating in monitoring. Is fecal coliform really one of things you need to monitor for as Mr. Rubin brought up the issues about?
Sergei – many groups use the data to their advantage or for their purposes and that might not be useful
Frank Franciosi – we need to be sure of the details of what we're monitoring for and if we're monitoring all or only a few
Michael Scott – If we do the Type I's we have over 100 of those. At this current point we have an agreement not to require testing at those facilities.
Ken Pickle – We reached that agreement because 60 facilities are easier to manage than 160 facilities. We came to the agreement that we better drop the little guys out of this until we have a plan for the big guys. At the present time our agreement with Michael is as we're working together he's not letting us know about the notified sites, we're not asking about them.
Michael Scott – currently we're looking at 60 fully permitted facilities but some of those are grinding operations so that brings us to about 45-50 facilities
Scott Mouw – could we get a sub-committee of this group to draw up the monitoring details
Jeri Covington – on the groundwater monitoring that was requested that opens up a whole other area of anomalies
Jon Risgaard – maybe something we look at on a case-by-case basis
Dave Halley – best idea might be get a small group of people to develop a monitoring position for us to review based on the feedback we're hearing here as a group
Joe Hack – is this monitoring for a stormwater permit or groundwater permit?
Scott Mouw – will serve us better if we put together a matrix on the monitoring requirements, adjustments could be made in regards to the permit

Monitoring Sub-committee Volunteers – Craig Coker, Joe Hack, Jeri Covington, Bob Rubin

Here are some of the tasks of Monitoring Sub-committee:

- **Who should do monitoring?**
- **Site specific?**
- **Required or voluntary compliance?**
- **Where should they sample?**
- **What is the frequency of sampling?**
- **What do we test for?**
- **Do different facilities have different monitoring criteria (site specific)?**
- **Establish limits on what is monitored**
- **How do we handle situations where limits are exceeded?**
- **Who do they report to and how?**
- **Costs of monitoring and funding options**

Goal: Sub-committee to meet, and develop a monitoring position and present to group for discussion and approval at next meeting.

Craig Coker – you've mentioned not including grinding operations
Michael Scott – currently we have an agreement with DWQ to not include those grinding operations
Frank Franciosi – you have limitations on amounts and how much material has to be moved at those facilities, other thing we ought to look at internally is funding through grants to do at least the first round of testing

3:00 PM WHAT ARE OTHER STATES DOING? : Craig Coker (NCCC) and Brian Rosa (NCDPP)

- How are other states handling and regulating compost facilities?
- What can we learn from their work?

Composting Regulations
- Depth and breadth of state regulations highly variable
- A fractured regulatory regime

Some States with Strong Regulations (list presented)
State Regs & Water Issues – Leachate, wash water, run-on, run-off
- Most regs written by Waste Management side
- Very few are comprehensive and multi-media

Examples
Minnesota – require for co-compost industrial stormwater permit, do not require for yard waste
Ohio – commercial food scrap composting – Class II (NC type III), runoff from storm events and leachate, preparation and implementation of stormwater pollution prevention plan

Jeri Covington – are they open or under cover in Ohio
Vermont – 3 different plans of stormwater permitting, agricultural exemption from runoff from farms
Conneticut – sample permit – stormwater collected in one of three lagoons, reused onsite or discharged by the treatment system, groundwater monitoring, quarterly and annual monitoring, surface water monitoring

Bob Rubin – way I read that it is treated in one of three ponds, its recycled back onto windrows or sprayed on roads to control dust, there is no surface discharge

Lafayette, Louisiana – Municipal composting facility permit, have to do grab samples during a rainfall event, two cell oxidation pond

Dave Halley – when you go through these permits can you tell how this is different than how NC normally does this?
Jennifer Jones – these says "limits" is this from the stormwater or wastewater

St. Louis Composting's Stormwater Permit – Missouri State Operation Permit
-commercial yard waste composting
- no discharge of untreated leachate
- no discharge of processed wastewater during dry weather

Scott Mouw – they're giving these limits based on stormwater management
Jennifer Jones – this is an individual permit, Missouri also has general permits

NYDEC Permit for Agri-Cycle
-stormwater permit
- very stringent

Scott Mouw – does this facility only have a stormwater permit? What about the facility before?

Jennifer Jones – Missouri has a combined group, they have stormwater and wastewater permits, general permits are discharged to a pond or such
Bob Rubin – I think just points out there's a discrepancy in how these terms are defined, but first we need to clarify what we mean by the terminology
Frank Franciosi – Look at Missouri regs regarding small facilities

Virginia – VDEQ Stormwater Permit for Royal Oak Farm

Scott Mouw – how do they treat leachate? It's comingled?

California Water Board Statewide Waiver Concept

-larger composting facilities currently have WDRs
-green waste composting conditional waiver
- comply by submitting report of waste discharge
- tiered water quality protection measures based on composting materials and site conditions
-public workshop August 2009

Summary

- Most regulate as stormwater with monitoring and stormwater P2 Plans
- Most will exempt small facilities from regulation – just not enough potential impact

Bethany Georgoulias – when you say most regulate as stormwater it seems only Virginia was doing this, talking about water that runs off a pile versus water that runs through it
Michael Scott – in Virginia it's a stormwater permit but they're putting it in a lined pond
Jennifer Jones – if you look at other states and you consider the intensity of the storm and amount of rain you can have – we can have 3 inches in a day but you look at Colorado they could have 3 inches in a year. Our workload is streamlined to be effective in North Carolina
Scott Mouw – with all respect to DWQ, it is setup as a silo system. There is a process problem – we have felt like it's important for the compost community to have a single point of contact in DWQ, perhaps a compost coordinator. I know it's going to be a challenge for DWQ but I think it's extremely important for the compost industry. When you're talking about the compost industry it's a group of entrepreneurs that have to make quick decisions and major investments.
Jennifer Jones – I don't' think it can be easily fixed. From the outside it seems like it would be. It seems that since there's such a volume of workload NC has split it up. There is so much work to be done with EVERY industry and composting is not the only industry that has multiple water permits.
Michael Scott – Ken Pickle has done a good job recently on being a point person. Commenting on the regional offices they do not have the wealth of expertise that the central offices do. You have to have that central person as a point of contact.
Jennifer Jones – I'm saying in NC we permit from the central office but in Missouri they permit from the Regional offices.
Bob Rubin – when this process is done I'd like to see a training manual so there is not such a disconnect between central and regional offices
Craig Coker – comment along with Bob's, got a grant to go around and do training at State regional offices. We trained about 180 people on composting. We need to have training for composters on water quality but also for regulators as to what makes a good versus bad composting facility.
Joe Hack – A well-managed compost facility will not have runoff during a dry period. During a storm event we will have runoff. I didn't see fecal coliform as a monitoring parameter in the other states permits.
Craig Coker – I didn't find it in the other States permits.
Sergei – maybe they don't classify it as a wastewater but they have their limits. Some of the limits were quite stringent and very difficult to achieve even with advanced treatment.
Bethany Georgoulias– general statutes and what they require for treatment systems does vary for stormwater and wastewater. If there are portions of this discharge, final product, runoff that stormwater BMP can achieve that's great but the clues right now have led us to believe that's not the case.
Craig Coker – In this Oregon report some of these BMPs were adequate

Bethany Georgoulias– I'm not sure about their definition of BMPs
Craig Coker – to an extent your hands are tied by statutes
Scott Mouw – drill down on Oregon regulations at our next meeting. They've gone through this process and they're the absolute best example. Think about that as a possible solution mode. I think we need to get a model on that soon. To clarify Bethany's point, we've talked about BMPs a lot but we need to get down to if they constitute wastewater treatment. I think there are alternatives that constitute wastewater treatment than ponds, treatment plants, and land application.
Ken Pickle – side light on BMPs – spoke to Bill Lord from CES, he and his group are ready to start to bring us a product on what can BMPs do on compost discharges. Until we know a wet pond will or won't do something to COD it's hard to tell what to do

Dave Halley – if you can develop these BMPs and reduce this pollution level, will it matter what you call it?
Craig Coker – these should be embodied in a way in a going forward basis that somebody looking at a permit knows
Scott Mouw – burden of proof is on that applicant
Frank Fanciosi – I'd go a step further that if we come to an agreement on this that, Michael, that's a check off box on the permit for you
Jason Watkins – I think that's our hope of what we can get to that there are not 10 different agencies you have to go through to get a permit
Jon Risgaard – I think you're putting more burden on Waste Management in an area of evaluation of wastewater management that they don't have the expertise in
Michael Scott – this is a conversation Jon and I keep having and you're not just dealing with the compost staff – we do have hydros and engineers on staff
Jon Risgaard – you may be reviewing wastewater treatment facilities which may be an added burden you're not comfortable with
Bradley – one thing to consider is that we talk about the uniqueness of these facilities and it's much easier to go to Michael and say we have one that's this way, how far can we go with guidance with these being so different
Jeri Covington – I keep hearing from the agencies about the workload but let's not use that as an issue to prevent us from moving forward.
Michael Scott – Since 2006 this has been an issue
Jeri Covington – workload or finances do not need to prevent us from making a decision or what direction we need to go
Jason Watkins – I think that's what the Oregon study brought out – put in place a set of standards that everyone agrees upon and move forward
Joe Hack – agree with what Michael said – right now every compost in the State has to go through his office. If he checks this box he hand it to the people in water quality that need it. The challenge is my compost facility is unique to the water quality program – they don't see that many of them. I think we can streamline the process a bit and it doesn't bypass anyone's system.
Stacy Smith – I'm going to agree that if we can streamline the process it's going to help everyone. I feel like even if you try to separate it DWM gets pulled back in eventually. Landfills have certain exemptions on sewer standards because DWM handles it.
Ken Pickle – We're here to compromise and we'll be in the group. Michael has 175 facilities and 2 have stormwater permits. We have the means to go in Michael's database and chase those facilities. 175 and we have 2 – we haven't done a good job notifying folks. The industry has to understand the importance of that runoff. This is real engineering, real site, and process. You have to hire an engineer. You cannot get DWQs pamphlet a year from now and design your site. You can't do this at the site shed. I'm arguing that it's the PEs job to tell the facility they need a stormwater permit.
Frank Franciosi – what I'm saying is where going to give DWM, Michael, a list of BMPs. It's up to the permittee to go to the proper group and get the permit.
Michael Scott – where there are a discharge, that's the case. Not moving away from discharging off the site and what's triggered. If we're permitting for zero discharge what are we triggering?
Ken Pickle – we don't care about that anyway – where there are no discharges. Moving away from permit application to DWQ I'm not okay with that.

Michael Scott – we've got this major issue with this monitoring sub-committee but we keep coming back to the current data we're dealing with today. So you design BMPs and the monitoring hasn't even started yet.
Frank Franciosi – no you start monitoring and then get the BMPs
Craig Coker – we need to start monitoring now to know what we're working with. We have this network of compost facilities that were built during an era when we didn't know about water issues. Do we take these and make them meet all the water quality standards or do we increase monitoring at these current facilities? At some point we as a composting industry we'd like to understand where are areas in the State are where the permit is going to be tougher because of water quality issues.
Jeri Covington – I think it comes down to the discharge, I think they're already in place but need to be incorporate a bit more
Frank Franciosi – we need to get the DWQ data showing which areas are more sensitive
Craig Coker – there is always going to be a storm even that exceeds what system you already have in place
Jon Risgaard – that's an issue for every non-discharge point in the state, animal operation facilities in the state. Theoretically I understand your concern but in reality there aren't going to be negative issues for that discharge.
Frank Franciosi - is it a named storm event or so many inches over time.
Joe Hack – Getting the data seems to be one of the big issues. I think I can convince my management to do more sampling at a Type I to help get more data to move this forward.

4:00 PM PARKING LOT/Q-Card QUESTIONS: Dave Halley

- Quick responses to questions
- Assigning questions for written response

David: Go to portal for current written responses to Parking Lot and Q-card questions.

4:15 PM NEXT STEPS/CLOSING/DEPART

Tentative Next Meetings: Wednesday, March 24, 2010
Thursday, April 22, 2010

David: We may need to consider full day meeting

Minutes provided by:
Liz Patterson, DENR-DWM
David Halley, True North Organizational Development Services