

## CCSMM Public Engagement Questions

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To: DEEP RecyclingProgram

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Thank you for the opportunity to provide input, concepts, and considerations for sustainable materials management solutions in CCSMM's four focus areas. This e-mail concerns the Organics focus area.

1. Are there any model programs, best practices, or innovative concepts that the Coalition should consider, that could provide a scalable solution in any of the Focus Areas, listed above?

Two programs come to mind: New York City's community compost program and Massachusetts DEP general permit program for compost facilities.

The NYC program is a grassroots program with two key features: Master Composters and the NYC Compost Project. The NYC Compost Project Master Composter Certificate Course is an advanced compost education and outreach program. The course is designed to build a citywide network of educators, advocates and community composters to support NYC Department of Sanitation composting initiatives. The NYC Compost Project, created by the NYC Department of Sanitation (DSNY) in 1993, works to rebuild NYC's soils by providing New Yorkers with the knowledge, skills, and opportunities they need to produce and use compost locally. NYC Compost Project programs are carried out by teams of DSNY-funded staff at seven partner organizations: Big Reuse, Brooklyn Botanic Garden, Earth Matter NY, LES Ecology Center, The New York Botanical Garden, Queens Botanical Garden, and Snug Harbor Cultural Center & Botanical Garden. Every town in CT should train Master Composters and should develop a community compost project.

In Massachusetts, regulatory requirements for composting and anaerobic digestion facilities vary depending on facility type and size. The requirements are established in the MassDEP Site Assignment Regulations (310 CMR 16) and include performance standards for specific types of facilities. Currently registered compost sites will need to certify to MassDEP and will be regulated either under a general permit or through a recycling, composting, or conversion (RCC) permit, depending on the facility size and feedstock.

General Permit. Some recycling, composting, and aerobic or anaerobic digestion operations qualify for a general permit as long as they meet specific performance and capacity specifications. (See 310 CMR 16.04.) Municipal and commercial sites must register with MassDEP and agricultural sites must register with MassDEP or the Department of Agricultural Resources. Operations qualifying for a general permit do

not require site assignments, but must notify local boards of health upon registration and submit an annual certification.

Recycling, Composting, or Conversion Permit. Facilities handling recyclable or organic materials that do not qualify for an exemption or a general permit must apply for a Recycling, Composting, or Conversion Facility (RCC) permit from MassDEP. (See 310 CMR 16.05.) An RCC operation does not require a solid waste facility site assignment.

2. For any solution identified in Question 1, what are the barriers that need to be addressed in order to advance any of these solutions at scale in Connecticut? a. Are there different implementation considerations for full or partial “subscription” towns versus towns that provide for curbside collection of trash & recyclables? b. Is it necessary or beneficial for the solution to be implemented on a statewide, multi-town, or other regional basis, or can it be implemented successfully town-by-town?

CT DEEP regulations need to be tiered and permit application review needs to be shortened/expedited. Food scrap drop-off locations can be established in every town, regardless of current collection schemes. Compost facilities can be implemented successfully town-by-town. Specialized equipment could be shared by towns, but the overall facility operation could still be managed/controlled by the town; e.g., SCRRA shares a wood-waste grinder with its member towns. Regional compost facilities are certainly possible.

3. For any solution identified in Question 1, please describe the types of implications or benefits that the solution provides with respect to: a. Sustainability- environmental benefits, b. Reducing costs

If every town in CT had a community compost project, food scraps could be recycled locally. Trucking costs (for food scraps leaving town as well as manufactured soil products coming into the town; e.g., Scotts miracle-gro soil bags) and disposal cost savings are significant. Composting is nature’s way of recycling. Full circle recycling of food scraps within individual towns is the very definition of sustainability.

4. Would you be interested or willing to present to the Coalition or a Coalition working group on solutions you've highlighted, or is there another speaker or organization that would be helpful for the Coalition to hear from on this topic?

Yes, we have worked on two of the NYC Compost Project facilities and we operate a compost facility in Massachusetts. We are working with SCRRA on a compost pilot test.

5. Are there things that DEEP should do differently in its approach to any of the above roles/functions, that would better support sustainable materials management in Connecticut?

Streamline the permitting process. We submitted a permit application for the SCRRA pilot test in late June and we are still waiting. The permit process will likely take longer than the actual test (4 month duration).

Please call with any questions.

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