

MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Permitting and Compliance Division
Waste and Underground Tank Management Bureau
Solid Waste Section

**Response to Public Comments Received for the
Proposed Granite County Solid Waste District Carcass Composting Operation – Drummond**

February 16, 2010

The Granite County Solid Waste District (GCSWD) submitted an application to the Montana Department of Environmental Quality (Department) Solid Waste Program for licensure and operation of a small compost facility. The GCSWD proposes to compost livestock mortalities and road-killed animals at the site of the current GCSWD local solid waste container site and Class III burn site. The GCSWD proposes to accept the livestock mortalities from local area farmers and ranchers and the road killed animals from the Montana Department of Transportation (MDT) local road district.

The Department published an Environmental Assessment (EA) of the proposal on December 28, 2009, and initiated a 30-day public comment period. The Department received 11 written comments on the proposed compost operation during the public comment period. Only one of the comments received opposed the proposed site. The response to the opposition is provided in the context of the proposed license action - that is, whether or not the proposal meets the requirements of the Solid Waste Management laws and rules. If the proposal meets the minimum requirements of the laws and rules, the license must be approved by the Solid Waste Program. However, the Department may require additional license conditions to protect human health and the environment. To that end, the Department's responses to the comments received during the public comment period are organized as follows:

- General Site Location – Site Selection
- Nuisance Issues
- Conclusions and Recommendations

General Site Location – Site Selection

Comment:

The proposed site is too close to families in the area.

Response:

Comment noted. Regarding the proximity of the proposed compost operation facility to homes in the area, the Administrative Rules of Montana (ARM) do not establish setback criteria from residences or businesses. The Department believes this is a local issue and does not get involved with site selection at the local level. Site selection is the responsibility of the applicant. The Department is keenly aware of the sensitivity of local residents and has heard similar concerns in the past regarding siting of similar facilities. However, the Department has no administrative authority, nor a direct role, in the issues of zoning or proximity to residences.

Comment:

The site will negatively impact property values.

Response:

The Department knows of no studies that conclusively show that such small composter operations have a negative impact on property values. The establishment of property values is a complex process that involves more than aesthetics. In addition, the site is currently home to the local municipal solid waste container site and is used by local residents for the collection of household garbage before it is transferred to a licensed Class II landfill. The site is a licensed Class III facility for the open burning of clean wood waste.

Nuisance Issues (Odors and Vectors)

Comment:

One commentor stated there would be a problem with odor and vectors.

Response:

Comment noted. Compliance with the solid waste laws and rules is a condition of the license. If the site cannot operate within the rules, the Department may pursue enforcement action against the facility that includes license revocation.

The site will use operating controls that include the construction and maintenance of a 12-ft woven wire fence and the application of at least 2-feet of wood chips beneath and above each carcass layer. The size of the carcasses typically determines the height of the windrow and thus the number of layers within the compost pile. In addition to providing the insulation necessary to facilitate decomposition, the top layer of wood chips also acts as a bio-filter that will capture and convert the odorous gases to carbon dioxide and water.

Field research has shown that properly managed carcass compost piles do not attract unwanted and undesirable scavengers, birds and vermin. To date, none of the currently active carcass composting sites, including those located in grizzly bear country, have had intrusions from unwanted vectors and vermin. Further, the Montana Department of Fish, Wildlife, and Parks (FWP) conducted an experiment with the finished compost at the Wolf and Grizzly Bear Recovery Center in West Yellowstone. In that experiment, compost from the MDT compost site in Victor was placed in the bear containment area. The results indicated that although the bears appeared to be interested in the new material in their containment facility, they did not eat it nor did they seem unduly attracted to it.

Conclusions and Recommendations

The Department's Solid Waste Program believes it has thoroughly reviewed the permit application and supplemental materials from the Granite County Solid Waste District. The Solid Waste Program has also reviewed and analyzed all written comments provided during the public comment period, as documented herein. Based on the review of all the materials and comments submitted, the Department believes that a license that meets the requirements of the laws and rules for solid waste management and is protective of human health and the environment can be issued for the Granite County Solid Waste District's new carcass composting operation.

The Department will issue the license for the facility based upon the approved Operations and Maintenance Plan with the following additions:

1. The 12-ft woven wire fence surrounding the facility will be inspected on at least a weekly basis to ensure the fence is tight and that there have been no breaches to the fence.
2. The facility will maintain at least 24 inches of wood chips over the active compost pile at all times to ensure adequate odor elimination and to reduce the attractiveness to scavenging animals including rodents, birds, and other vermin.