DEQ	RESOURCE MANAGEMENT DIVISION POLICY AND PROCEDURE		DEPARTMENT OF ENVIRONMENTAL QUALITY
Original Effective Date: June 23, 1995 **Revised Date:** January 25, 2012 **Reformatted Date:** August 23, 2012	**Subject:** Use of Yard Clippings Compost as Landfill Cover **Program Name:** Solid Waste and Land Application Section **Number:** RMD-General-13	**Page:** 1 of 4	**Category:** ☐ Internal/Administrative ☐ External/Non-Interpretive ☒ External/Interpretive

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INTRODUCTION, PURPOSE, OR ISSUE:

This Policy and Procedure provides guidance on the use of composted yard clippings as alternative daily cover, interim cover, or final cover at solid waste landfills.

AUTHORITY:

Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

STAKEHOLDER INVOLVEMENT:

This Policy and Procedure was developed with input from the Michigan Waste Industries Association.

DEFINITIONS:

"Yard clippings" are defined in part in Section 11506(8) as, "leaves, grass clippings, vegetable or other garden debris, shrubbery, or brush or tree trimmings less than 4 feet in length and 2 inches in diameter, which can be converted to compost humus."

"Compost," according to R 299.4106a(b), "means organic matter from yard clippings or compostable materials which have undergone biological decomposition by composting, which have been stabilized to a degree that it is potentially beneficial to plant growth without creating a nuisance, and which are used or sold for use as a soil amendment, artificial topsoil, or growing medium amendment or for other similar uses."

POLICY:

Section 11514 prohibits an owner/operator of a landfill from knowingly permitting the disposal in the landfill of more than a *de minimis* amount of yard clippings, unless they are diseased, infested, or composed of invasive species as authorized by Section 11521(1)(i).

Yard clippings, when properly collected and processed, can be composted to yield a high quality end product. Conversely, poor collection and processing techniques result in a low quality end product that is not completely decomposed, does not support plant growth, and may contain plastic bag fragments and other debris; and has no market value and little potential for beneficial use.

This Policy and Procedure was first issued on June 23, 1995, in response to requests from landfill operators to use incompletely composted material as alternative daily cover at Type II and Type III landfills. The use of compost in the establishment of final cover was also requested. This Policy and Procedure has been revised to reflect the amendments to Part 115 under 2007 PA 212 that became effective on March 26, 2008.

The position of the Resource Management Division (RMD) on the use of compost-related materials for alternative daily cover is as follows:

1. Incompletely composted yard clippings, since it at least partially consists of material that can still be "converted into compost humus," must be considered to still be yard clippings. Incompletely composted material is not finished compost as described in Item 2, below. Thus, incompletely composted yard clippings are prohibited from use as alternative daily cover and may not be disposed in a landfill.

2. Determination that the material is "finished compost" may be made by analysis using the Dewar self-heating method, by record keeping demonstrating the failure of windrowed material to heat following turning and curing or by other acceptable testing methodology. Notwithstanding the annual characterization requirements for approved alternative daily cover contained in RMD's Policy and Procedure 115-10, at least one sample should be analyzed for each 2,000 cubic yards of finished compost. This frequency may be reduced in the future if samples from the same process show consistent results. Finished compost must meet performance and aesthetic standards to ensure that it will promote the establishment of vegetation. This means that it will have to be fully composted, mature, and screened to remove large particles and any visible contaminants (plastic fragments, sticks, stones, tennis balls, etc.). Finished compost should not contain more than 1 percent, by weight, of foreign matter that will remain on a 4-millimeter screen.

3. Finished compost may be used as an alternative daily cover, providing it meets all the criteria listed in Policy and Procedure 115-10 for alternative daily covers and is approved for such use.

4. Screening rejects that are likely to contain a high percentage of sticks, stones, plastics, and other foreign materials not amenable to composting, if approved, may be used as an alternative daily cover material. Screening rejects used as daily cover must meet all performance and analytical requirements for alternative daily cover outlined in Policy and Procedure 115-10.

5. Per Policy and Procedure 115-10, the request to use finished compost or screening rejects as an alternative daily cover shall be submitted to the appropriate RMD District Office and reviewed and approved in writing by the RMD District Supervisor prior to a licensee using the material.

6. If the owner/operator of a landfill is composting yard clippings at the landfill, the landfill operation plans must describe the composting operations and the operations must be consistent with such plans per Section 11521(1)(g).

7. Per Policy and Procedure 115-10, copies of all approvals and denials for use of yard clippings as daily cover should be sent by RMD district field staff to the Chief of the Solid Waste and Land Application Section to be maintained in a central file for reference and to ensure statewide consistency.

8. Finished compost may also be used to establish a vegetative growth zone for a final cap. In most cases, compost used as final cover will need to be mixed with topsoil and/or used as a top dressing layer over a layer of topsoil.

9. Yard clippings may be land applied to interim cover material in order to help establish vegetative growth and prevent erosion. Operators should take care to apply yard clippings so that vegetative growth is not stunted or otherwise negatively impacted by an excess of actively decomposing yard clippings. All yard clippings used as interim cover must be removed prior to placing additional waste in the landfill cell. If complete removal is not possible, then incompletely composted yard clippings shall not be used for interim cover.

10. Disposal options are limited for low-grade yard clippings compost that does not meet the criteria for alternative daily cover outlined in Policy and Procedure 115-10 or incompletely composted yard clippings. Incompletely composted yard clippings may be land applied at agronomic rates (if free of contaminants) or processed to allow the composting process to be completed. Low-grade compost (that does not meet alternative daily cover criteria) will need to be upgraded, by screening or other processing, to specifications that make it suitable for agricultural, silviculture, horticultural, or other acceptable uses.

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8/23/2012
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