



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 27, 2020

Edward Forton
Techni-Comp
4200 Dove Road
Port Huron, Michigan 48060

Dear Mr. Forton:

SUBJECT: Violation Notice; Techni-Comp (Composting Specialists), Inc.
4152 Dove Road, Port Huron and Northern Parcel ID Number 74-28-018-2009-000
Waste Data System Number: 470804

On November 21, 2019, staff from the Department of Environment, Great Lakes and Energy (EGLE), Materials Management Division (MMD) and Water Resources Division (WRD) conducted an inspection of Techni-Comp (Composting Specialist), Inc. (Techni-Comp), located at 4152 Dove Road, Port Huron, Michigan. The purpose of the inspection was to evaluate compliance with Part 115, Solid Waste Management, and Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and the administrative rules promulgated pursuant to Parts 115 and 31. The inspection consisted of an inspection of the facility, as well as a collection of surface water and compost samples.

Part 115 – Solid Waste Management

At the time of the inspection on November 21, 2019, Techni-Comp was not in compliance with the following requirements of Section 11521(4) of Part 115:

- Techni-Comp staff stated that a substantial amount of the compostable materials on-site had been there for more than three years. This violates the speculative accumulation requirements of Section 11521(4)(c)(iii).
- Techni-Comp had not reported to the department within 30 days after the end of each state fiscal year (September 30th) the amount of yard clippings and other compostable material composted in the previous state fiscal year as required under Section 11521(4)(a). Following the inspection, EGLE received the data for the previous fiscal year (2018-2019) on December 18, 2019.
- Techni-Comp must relocate the management or storage of yard clippings, compost, and residuals from areas within 100 feet from a body of surface water including a lake, stream or wetland, unless compost operations were already located in these areas on December 1, 2007, as required in Section 11521(4)(b)(i). Please be advised there are other isolation distances that also must be maintained that are listed under Part 115.
- The active composting area was estimated to contain well over the limit of 5,000 cubic yards per any acre, as outlined in Section 11521(4)(c)(ii).

- Techni-Comp staff stated that some of the required records outlined in Section 11521(4)(d) are not being maintained. These records should include but are not limited to; the volume of materials brought to and taken off site, carbon-to-nitrogen ratios, the amount of leaves and the amount of grass, temperature readings, moisture content readings, and lab analysis of finished products. In addition, Techni-Comp staff reported that equipment, such as a compost thermometer, to obtain the readings for the records are not available.
- Techni-Comp is not maintaining proper slopes and grades to prevent pooling of water as required under Section 11521(4)(c)(vi). EGLE staff observed substantial ponding in the composting area.
- Techni-Comp is not properly managing stormwater runoff as required under Section 11521(4)(c)(vii). In addition, Techni-Comp had excavated ditches to nearby water bodies reportedly to aid in drainage of the compost area.
- Techni-Comp must demonstrate that it has complied with Section 11521(4)(c)(i) requirement for a facility to compost and manage the site in a manner that does not violate this act or create a facility as defined in Section 20101 (soil or groundwater contamination). Further information on these requirements can be found below under Part 201 – Soil and Groundwater Contamination.

On December 21, 2018, a Compliance Communication was sent to Techni-Comp from EGLE MMD which included many of the items listed above. EGLE has not received a response to this Compliance Communication. A copy of this letter is enclosed.

In order for Techni-Comp to continue to operate as a qualified Registered Compost Facility, all requirements of Section 11521(4) of Part 115 must be met.

In addition to the deficiencies under the Registered Compost Site requirements, MMD staff also observed a pile of construction and demolition (C & D) waste on the ground in the wood yard reportedly from the Techni-Comp owner's construction business. In addition to the C & D waste pile, scrap wood was observed by EGLE staff in the large wood pile near the C & D waste pile. Scrap wood, such as painted, treated wood, plywood was observed in the wood pile and is considered to be a solid waste. The dumping of C & D waste and scrap wood is in violation of Section 11527(1) which requires solid waste to be transported to a landfill or transfer facility and Rule 299.4128(1) which prohibits a person from disposing of solid waste in an open dump.

This violation was discussed with the owner on November 21, 2019 during the on-site visit. On November 26, 2019, Techni-Comp submitted an email with pictures showing that the C & D waste had been removed and a solid waste gate ticket was attached. No pictures or documentation was sent indicating that the scrap wood has been removed from the wood pile in the wood yard; therefore, this item still needs to be addressed.

Paper Mill Sludge

Please be advised that EGLE has made the determination that the paper mill sludge from Domtar is not considered inert and has notified Domtar of this change. Therefore, the use of this material as a soil/compost amendment is no longer acceptable.

On November 21, 2019, EGLE staff observed paper mill sludge stored and used as an amendment in the compost material at the Techni-Comp compost facility. Domtar (also known as E.B. Eddy Paper, Inc) notified EGLE of the use of their paper mill sludge for the purpose of composting with yard waste at Techni-Comp beginning in 1998. It has been found that some paper mill sludge contains Per- and Polyfluoroalkyl Substances (PFAS), more specifically the substances perfluorooctanoic acid (PFOA) and perfluorooctanesulfonate (PFOS). In response to this information, EGLE collected samples of compost material for PFAS testing during the site inspection on November 21, 2019. The results of this testing show elevated levels of PFOA and PFOS in all samples (Table 1).

In addition, the paper mill waste material was reportedly spread onto a section of the northern vacant parcel (Parcel ID number 74-28-018-2009-000), as a soil amendment for a future hayfield. A pile of paper mill sludge remained on the north parcel near the on-site pond. Following the inspection, Techni-Comp personnel indicated in an email that the pile of paper mill sludge on the north parcel had been relocated back to the compost facility and attached a picture to document this action.

During the inspection, Techni-Comp personnel reported that some of the paper mill sludge was spread onto an area on the property this year for use as a fertilizer or soil enhancer for the growing of hay. Techni-Comp personnel reported that they were unaware of the restricted use of the Domtar's paper mill sludge.

There are requirements and approvals for land applying paper mill sludge. Neither Techni-Comp nor Domtar have such approvals. Therefore, the land application and storage of the paper mill waste on the north parcel constitutes disposal and is a violation of Section 11527(1) which requires solid waste to be transported to a landfill or transfer facility and Rule 299.4128(1) which prohibits a person from disposing of solid waste in an open dump.

Part 31 – Water Resources Division

Inspection of the facility by EGLE staff revealed that Techni-Comp currently has discharges of compost wastewater and stormwater to waters of the State. Please be advised that permit authorization is required for the discharge of compost wastewater and stormwater associated with composting activities. The unauthorized discharge of such wastewaters to surface waters of the state are violations of Part 31 of NREPA.

Samples collected by WRD staff during the site inspection were analyzed for PFAS, as well as other parameters commonly found in compost wastewater. A review of the surface water sampling data indicates that runoff from the facility does exceed Water Quality Standards for PFOS and PFOA. PFAS data from the sampling event is presented in Table 2.

Please be advised that Section 3109 of Part 31 states the following:

A person shall not directly or indirectly discharge into the waters of the state a substance that is or may become injurious to any of the following: (a) To the public health, safety, or welfare; (b) To domestic, commercial, industrial, agricultural, recreational, or other uses that are being made or may be made of such waters; (c) To the value or utility of riparian lands; (d) To livestock, wild animals, birds, fish, aquatic life, or plants or to their growth or propagation; (e) To the value of fish and game.

Techni-Comp is required to prepare a comprehensive plan describing interim measures taken to manage, control and prevent compost wastewater and contaminated stormwater from discharging to waters of the State. Please note that if Techni-Comp is unable to manage the compost wastewater in a manner that prevents discharges to waters of the state on a permanent basis, the facility must obtain discharge authorization through a National Pollutant Discharge Elimination System (NPDES) Individual Wastewater Discharge permit and/or Groundwater Discharge Permit.

In addition, if Techni-Comp will continue to operate as a composting facility and discharge stormwater runoff to waters of the state, the company must also obtain NPDES industrial stormwater permit coverage. Additional information on the industrial stormwater permit requirements can be found on the EGLE website at www.michigan.gov/EGLEstormwater.

Part 201 – Soil and Groundwater Contamination

As of January 10, 2018, groundwater criteria for drinking water protection for PFOA and PFOS were established by EGLE under the authority of Part 201, Environmental Remediation, of NREPA. The groundwater criteria for drinking water protection is 0.07 ug/L (70 parts per trillion) for the combined concentrations of PFOA and PFOS.

The release of PFAS-containing paper mill sludge to the environment may have resulted in concentrations in groundwater of PFOA and/or PFOS at levels above current criteria under Part 201 of the NREPA, and EGLE considers Techni-Comp responsible for investigating the potential release of PFOA and PFOS to the environment.

Liable parties under Section 20126 of Part 201 have the responsibility to comply with Section 20114 of Part 201, which lists the requirements of a liable party to address environmental contamination. These steps include, as applicable:

- Immediately taking measures to contain or remove the contamination source;
- Immediately identifying and eliminating any threat of drinking water exposures at on-site and off-site properties;
- Notifying EGLE and affected neighbors if contamination has migrated off the property;
- Delineating the extent of the contamination; and
- Undertaking the cleanup of the contamination.

Additional requirements under Section 20114 of Part 201 may apply to this situation.

If the investigation of conditions at Techni-Comp shows that PFAS contamination exists at levels above the Part 201 criteria, Techni-Comp must conduct response activities as necessary to comply with Part 201 and to protect public health and the environment. Techni-Comp may want to confer with an environmental consultant to assist in complying with the provisions of Part 201.

The explanations of Part 201 in this notice should not be considered a completed listing of Techni-Comp's legal obligations. The Part 201 statute and rules can be found in their entirety at EGLE's Web site: www.Michigan.gov/EGLE by clicking on 'Land', 'Remediation' and then 'Site Investigation and Remediation'.

Conclusion

The violations identified in this Violation Notice are continuing and are violations of Part 115 and 31 of the NREPA, and the associated rules promulgated thereunder. Therefore, Techni-Comp should take immediate action to achieve and maintain compliance with the terms and conditions of Part 115 and Part 31 of the NREPA.

Please submit documentation regarding those actions taken, or to be taken, to address the violations outlined in this Notice no later than March 27, 2020. If the violations are not resolved by the date of the response, the response should include a work plan and schedule for the completion of the corrective actions. The response should be addressed to Greg Morrow, Assistant District Supervisor for the EGLE MMD, at the Warren District Office. At a minimum, the response must:

- Provide a complete accounting of the purchase or movement of the compost including, but not limited to, the name of the person or business and the contact information, the location where compost was delivered or any other information that will help in obtaining the whereabouts of compost removed from Techni-Comp in the last 5 years.
- Provide documentation that the contaminated yard waste, compost, compost rejects, paper mill sludge and soil in direct contact with the paper mill sludge has been properly disposed.
- Provide sampling verification that all the paper mill sludge has been removed from the northern parcel.
- Provide a schedule/plan to implement a permanent remedy to eliminate all PFAS-contaminated compost and soil from the site.
- Provide a schedule/plan to eliminate all discharges of wastewater to the surface or groundwaters of the state. This includes any stormwater runoff that contains PFAS and all leachate from composting operations.
- Provide a schedule/plan to investigate potential subsurface PFAS contamination on-and off-site to assess the potential for impacts to groundwater used as drinking water.
- Provide documentation that the requirements to be qualified as a registered compost facility have been met.
- Provide documentation that the scrap wood has been removed and properly disposed.

In addition to the above items, if Techni-Comp has additional information it would like the Department to consider regarding the violations identified in this Violation Notice, please provide it with the written response.

This Violation Notice does not preclude, nor limit, the EGLE's ability to initiate any other enforcement action under state or federal law, as deemed appropriate.

Techni-Comp
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February 27, 2020

We anticipate and appreciate your cooperation in resolving this matter. Should Techni-Comp require further information regarding this Violation Notice or would like to arrange a meeting to discuss it, please contact the undersigned.

Sincerely,



Wendy Lukianoff
Environmental Quality Analyst
Warren District Office
Materials Management Division
586-256-8505



Eric Moore
Environmental Quality Analyst
Warren District Office
Water Resources Division
586-292-4308

Enclosure

cc: Mr. Steve Demick, St Clair County Environmental Health Division
Mr. Robert G. Lewandowski, Jr., Supervisor, Port Huron Township
Ms. Amy Epkey, ELGE
Ms. Rhonda Oyer, EGLE
Ms. Tracy Kecskemeti, EGLE
Ms. Melinda Steffler, EGLE
Mr. Greg Morrow, EGLE
Mr. Duane Roskoskey, EGLE
Mr. Aaron Hiday, EGLE

Table 1: PFOS and PFOA concentrations in compost samples collected on 11/21/2019.

Sample Name	Sample Description	PFOS (µg/Kg)	PFOA (µg/Kg)
1	Recently deposited paper mill waste sludge	13	1.5
2	Old/Finished compost	110	870
3	Middle-aged compost	29	670

Table 2: PFOS and PFOA concentrations in surface waters collected on 11/21/2019. Bold numbers indicate that results that exceed the State's Rule 57 Water Quality Standards.

Sample Name	Sample Description	PFOS (ng/L)	PFOA (ng/L)
	Rule 57 Water Quality Standard	12	12,000
UP1	Huffman Drain, entering TC property	29	52
UP2	Unnamed drain, upstream of compost piles	14	590
DOWN1	Huffman drain, upstream of confluence with unnamed drain	31	230
DOWN2	Unnamed drain, upstream of confluence with Huffman Drain	200	53,000
DOWN3	Huffman Drain, downstream of composting operations	36	690
POND	Runoff pond within area of composting operations	130	8,300



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREETHER
DIRECTOR

December 21, 2018

Mr. Edward Forton
Techni-comp (Composting Specialists) Inc.
1632 Michigan Road,
Port Huron, Michigan 48060

Dear Mr. Forton:

**SUBJECT: Compliance Communication, Techni-comp (Composting Specialists) Inc.
Composting Facility; Waste Data System Number 484466**

On September 26, 2018, Michigan Department of Environmental Quality (DEQ), Waste Management and Radiological Protection Division (WMRPD) staff performed a site inspection at the Techni-comp (Composting Specialists) Inc. (Techni-comp) Registered Compost Facility located at 4152 Dove Road, Port Huron, Michigan, 48060.

During the DEQ's visit to the compost facility, several large piles and windrows of composting yard clippings were observed. There were no odors observed during the inspection other than what would be expected at an active composting facility, and the finished material appeared to meet the criteria outlined in Section 11521(4)(c)(iv) of Part 115, Solid Waste, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 115).

There were several issues identified at this site:

- The facility is currently in violation of speculative accumulation requirements
- Lack of required records
- More than 5,000 cubic yards of compost per any acre
- Storm water control and pooling of water on site
- Compost windrow on fire

Techni-comp staff stated that a substantial amount of the compostable materials on-site had been there for more than three years. This violates the speculative accumulation requirements of Section 11521(4)(c)(iii) of Part 115. Techni-comp staff stated that the facility is taking in a much smaller amount of material than the previous owner in an attempt to move more finished material off-site. It is important for Techni-comp to ensure that it remains in compliance with Section 11521(4)(c) of Part 115.

During the inspection, Techni-comp staff stated that some of the required records outlined in Section 11521(4)(d) of Part 115 are not being maintained. These records should include but are not limited to; volume of materials brought to and taken off site, carbon-to-nitrogen ratios, the amount of leaves and the amount of grass, temperature readings, moisture content readings, and lab analysis of finished products. These records are required under statute, and Techni-comp is currently out of compliance for not properly maintaining these records. Please begin maintaining these records immediately.

The active composting area was estimated to contain well over the 5,000 cubic yards per any acre limit as outlined in Section 11521(4)(c)(ii). It is known that large compost piles can turn anaerobic and pose a risk of creating nuisance odors or of spontaneously combusting. Techni-comp needs to come into compliance with the 5,000 cubic yards per any acre limit or petition the DEQ WMRPD to approve having more than 5,000 cubic yards per any acre of the site.

Proper control of water on site is essential to maintaining a composting facility in compliance with Section 11521 of Part 115. However, water was observed pooling around the bases of the compost piles, and between some of the piles due to them being situated close together. The DEQ would like to remind Techni-comp that compost piles/windrows with water pooled around the base can go anaerobic and pose a risk of creating nuisance odors or of spontaneously combusting if not handled properly.

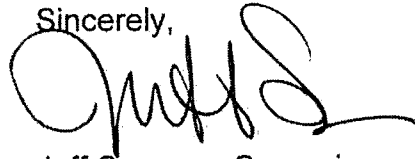
Finally, the DEQ would like to address the fact that, according to Techni-comp staff, there was a compost windrow that had caught fire and had been smoldering for months. After discussions on-site, DEQ staff determined that this windrow likely became anaerobic deep within the pile which led to the spontaneous combustion of the pile when the temperatures rose too high. Other piles/windrows of composting materials on-site are even larger than the afore-mentioned windrow. These piles are also at risk of spontaneously combusting, and several of them are encroaching on the site's tree line. With these piles so close to the tree line, a compost fire could easily escalate into a much larger situation.

Please find attached, documents that are also available on the DEQ's composting webpage, www.michigan.gov/deqcompost, and are meant to guide compost sites in fulfilling the requirements outlined in Section 11521 of Part 115. You will also find a copy of the completed inspection form attached to this communication.

Please submit a plan with specific objectives to address the site issues listed above by January 22, 2019, to DEQ, P.O. Box 30241, Lansing, Michigan 48909. Also, as part of your plan submission, please include a Site Safety Plan that addresses fire prevention and response.

If you have any questions or concerns, please feel free to contact Mr. Aaron Hiday, Compost Program Coordinator, Sustainable Materials Management Unit, Solid Waste Section, WMRPD at 517-282-7546, hidaya@michigan.gov, or DEQ, P.O. Box 30241, Lansing, Michigan 48909.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Spencer', written over a large, stylized initial 'J'.

Jeff Spencer, Supervisor
Sustainable Materials Management Unit
Waste Management and
Radiological Protection Division
517-284-6879

Enclosures

cc: Ms. Rhonda S. Oyer, DEQ
Ms. Tracy Kecskemeti, DEQ
Mr. Micky Leonard, DEQ
Ms. Wendy Lukianoff, DEQ
Mr. Joshua Peters, DEQ
Mr. Alexander Whitlow, DEQ
Mr. Aaron Hiday, DEQ



**DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE MANAGEMENT AND RADIOLOGICAL PROTECTION DIVISION**

FOR DEQ USE ONLY
Date Received by DEQ: _____
Received by: _____
WDS #

COMPOSTING FACILITY ANNUAL REPORTING FORM

Annual reporting is required to be submitted to the DEQ within 30 days after the end of each fiscal year under authority of Section 11521(4) of Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to comply with the provisions of Part 115 may result in fines and/or imprisonment. NOTE: The annual reporting period is the state's fiscal year (October 1 through September 30); and this form must be submitted to the DEQ by October 30.

FOR ADDITIONAL INFORMATION, CONTACT THE DEPARTMENT OF ENVIRONMENTAL QUALITY, WASTE MANAGEMENT AND RADIOLOGICAL PROTECTION DIVISION, SOLID WASTE SECTION, AT 517-284-6588

COMPOSTING FACILITY AND CONTACT	
1. Legal Company Name or Municipality: _____	
2. Michigan Corporate ID Number (required): _____	
3. Mailing Address: _____	
4. Site Address: _____	5. County: _____
6. Composting Facility Contact: _____	
7. Area Code and Telephone Number: _____	8. E-mail Address: _____
9. Reporting year: October 1, 2017 to September 30, 2018	10. Area of composting facility where active composting activities are occurring: _____ acres Total area of composting facility including the area not involved in the composting operation: _____ acres
COMPOSTABLE MATERIAL RECEIVED AND DISTRIBUTED	
11. Number of cubic yards of yard clippings and other compostable material on-site as of October 1 of the previous year (This number should be the same number as was inserted into Box 16 from the previous year's annual report form.)	cubic yards
12. Number of cubic yards of yard clippings brought to the site from October 1 of previous year to September 30	cubic yards
13. Number of cubic yards of other compostable material brought to site from October 1 of previous year to September 30. See instructions on next page for materials definitions. AP _____ yds ³ BS _____ yds ³ CP _____ yds ³ DF _____ yds ³ DN _____ yds ³ DW _____ yds ³ FP _____ yds ³ FW _____ yds ³ FS _____ yds ³ LM _____ yds ³ MF _____ yds ³ MN _____ yds ³ PP _____ yds ³ SB _____ yds ³ SG _____ yds ³ WA _____ yds ³ WD _____ yds ³ Other(describe) _____ yds ³	total cubic yards of materials from #13.
14. Number of cubic yards of yard clippings, finished compost and other compostable material removed from site from October 1 to September 30. FC _____ yds ³ CM _____ yds ³ RD _____ yds ³	total cubic yards of materials from #14.
15. Number of cubic yards of yard clippings and other compostable material, finished compost, and residuals on site at the end of September 30 (This number should be an actual measurement of the piles.): FC _____ yds ³ CM _____ yds ³ RD _____ yds ³	total cubic yards of materials from #15.
16. CONVERSION FACTOR: If a conversion factor was used to convert tons of material to cubic yards, what conversion factor was used and for what material: <input type="checkbox"/> Check here if no conversion factor was used	
Material:	Conversion Factor Calculation:
	cubic yards=1 ton
	cubic yards=1 ton
I, the undersigned owner or operator or authorized agent, swear and affirm, under penalty of law that the information contained on this form, to the best of my knowledge and belief, is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.	
PRINT NAME: _____	DATE: _____
SIGNATURE: _____	

INSTRUCTIONS FOR COMPLETING THE COMPOST FACILITY ANNUAL REPORTING FORM

PLEASE COMPLETE ALL FIELDS, FORMS MISSING INFORMATION WILL BE CONSIDERED ADMINISTRATIVELY INCOMPLETE AND RETURNED.

All DEQ registered composting facilities must submit annual reports that summarize the volume of yard clippings and other compostable materials that were composted during the state's fiscal year (October 1 through September 30) on a form provided by the DEQ. Reports must be submitted to the DEQ by October 30. Keep a copy for your records. Submit reports to:

Mr. Aaron Hiday
Department of Environmental Quality
Waste Management and Radiological Protection Division
P.O. Box 30241
Lansing, Michigan 48909-7741

OR

Via Email to:
hidaya@michigan.gov

COMPOSTING FACILITY PROPERTY OWNER

- 1. Legal Company Name or Municipality:** Enter the name of the individual, partnership, corporation, association, governmental entity, or other legal entity who owns the property. The owner(s) of the property upon which the composting facility business is located or their registered agent must submit the annual reporting form.
- 2. Michigan ID Corporate Number:** You must enter the six digit corporate ID number (ID) assigned by the Department of Licensing & Regulatory Affairs Corporation Division. This is NOT your tax ID number. If you do not have a corporate ID number, you must register under your own name and write "sole proprietor" in the Michigan Corporate ID Number space. NOTE: Municipally owned facilities do not have a corporate ID Number. Please enter n/a or "Municipality" for these.
- 3. Mailing Address:** Enter the address where correspondence to the operator should be sent.
- 4. Site Address:** The address of the composting facility. Enter "SAME" if it is the same as the mailing address.
- 5. County:** Enter the County where the composting facility is located.
- 6. Composting Facility Contact:** The name(s) of the person(s) who are to be contacted if there are questions about the report.
- 7. Area Code and Telephone Number:** Enter the telephone number at which the operator can be contacted.
- 8. E-mail Address:** Enter the e-mail address where electronic correspondence to the facility contact may be sent.
- 9.** Date that this report covers.
- 10.** Insert acreage of active composting facility including, staging, storage, and active composting areas. Do not include areas where composting activities are not occurring. Insert total area of facility including composting operation and area where composting operations are not occurring.

COMPOSTABLE MATERIAL RECEIVED AND DISTRIBUTED

Complete the table with the appropriate information. Records should be used where appropriate, however the volume on site at the end of the fiscal year (October 1 – September 30) should be an actual measurement. It is expected that the volumes reported will reflect a reasonable natural volume reduction of up to approximately 50% as a result of the composting process.

- 11.** Number of cubic yards of yard clippings and other compostable materials on site of the beginning of the fiscal year reporting cycle (October 1 of previous year). This number should be the same number as was inserted into Box 13 from the previous year's annual report form. If the site contained no materials as of October 1 of the previous year, please enter 0 for this value.
- 12.** Number of cubic yards of yard clippings brought to site during previous fiscal year. This number is from records that are required by Section 11521(4)(d)(i).
- 13.** Number of cubic yards of other compostable material brought to the site the previous fiscal year. This number is from records that are required by Section 11521(4)(d)(i). Definitions of materials are as follows: (AP) Aquatic Plants (BS) Biosolids (CP) Compostable Products (DF) Dead Animals(farm) (DN) Dead Animals(non-farm) (DW) Drywall (FP) Food Processing Residuals (FW) Food Wastes* (FS) Fish Wastes (LM) Lime from a Kraft paper process prior to bleaching (MF) Manures(farm) (MN) Manures(non-farm) (PP) Paper Products (SB) Sugar Beet limes (SG) Spent Grain from breweries (WA) Wood Ash (WD) Wood
- 14.** Number of cubic yards of finished compost and other compostable materials removed from site during previous year. This number is from records that are required by Section 11521(4)(d)(i). Definitions of materials are as follows: (FC) Finished Compost (CM) Compostable Materials (RD) Residuals
- 15.** Number of cubic yards of yard clippings and other compostable material, finished compost, and residuals on site at the end of the fiscal year (September 30). (This number should be an actual measurement of the piles.) Definitions of materials are as follows: (FC) Finished Compost (CM) Compostable Materials (RD) Residuals
- 16.** If a conversion factor was used to convert tons of material to cubic yards, what conversion factor was used and for what material. If conversions were done for more than two materials, attach a separate sheet with the additional conversion rates for each additional material.

SIGNATURE: Either the owner or operator of the composting facility or the registered agent may sign. If the registered agent signs, you must provide authorization to do so.

* Standard conversion is 2 cubic yards of food waste per wet ton. This number is from records that are required by Section 11521(4)(d)(i).

Compost Volume Tracker

Section 11521(4)(c) of Part 115, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, requires Department of Environmental Quality (DEQ), registered composting facilities to keep records to document that they have not accumulated yard clippings over 3 years unless they have the capacity to compost the yard clippings and they have received DEQ approval for a longer time period. Beginning the third year of operation, and each year thereafter, a facility needs to be able to document that they have been able to transfer off-site not less than 75 percent by weight or volume of the amount of yard clippings and compost that was on-site at the beginning of the calendar year.

The Compost Volume Tracker is an example of a record that may be used to show compliance with these requirements. A composting facility may develop their own format that better fits their needs. The form should contain all the information contained in this form. The information from this form can be used to fill out the annual reporting form (EQP 5229) that must be submitted to the DEQ by October 30 of each year. This form should NOT be sent to the DEQ as part of your yearly reporting requirements but, if requested, it or one similar to it, should be made available to staff during a site inspection.

Additional guidance to assist in composting yard clippings can be found in the Frequently Asked Questions document posted on the composting web site located by going to www.Michigan.gov/DEQ by clicking on, "Waste," then "Solid Waste," and then "Composting."

- 1) Reporting year: October 1, 20____ to September 30, 20____
- 2) Legal Company Name or Municipality: _____
- 3) Site Address: _____
- 4) Name of person preparing report: _____
- 5) Year and date that the site first started to collect yard waste: _____

6) Number of cubic yards of yard clippings, other compostable material, and residuals onsite as of October 1 of the previous year:	_____ Cubic Yards
7) Number of cubic yards of yard clippings and other compostable material brought to the site from October 1 of previous year through September 30:	_____ Cubic Yards
8) Volume of compost removed from the site from October 1 through September 30:	_____ Cubic Yards
9) Volume of residuals from the compost removed from the site from October 1 through September 30:	_____ Cubic Yards
10) Total volume on site at the end of the year not accounting for natural volume reduction (line 6 + line 7 - line 8 - line 9):	_____ Cubic Yards
11) Total measured volume on site on September 30:	_____ Cubic Yards
12) Calculated natural volume reduction (line 10 divided by line 11):	_____ Percentage
13) If a conversion factor was used to convert tons of material to cubic yards, what conversion factor was used and for what material?	Material: _____ cubic yards/ton Material: _____ cubic yards/ton Material: _____ cubic yards/ton