

11/28/17

CAFF's recommendations for on-farm composting

Focused on composting by crop farmers. Composting by dairies a separate issue.

Would like to expand the agricultural exemption to encompass most on-farm composting, such that farmers would not need a water board permit if follow BMPs. Could we make Cal Recycle and the LEAs responsible to supervise, notification? CDFA to promote BMPs

Water Board Compost General Order has agricultural composting exemption if:

1. <5,000 cubic yards facility (<500 cubic yards at any one time?)
2. Feedstocks come from own farm and exclude manure, except 10% manure allowed as additive
3. Compost only used on own farm(s)
4. <=1,000 cubic yards of compost given away or sold in a year

We recommend:

1. Increase size of facility to Cal Recycle limit of 12,500 cubic yards
2. Feedstocks from own farm or another farm and include herbivore manure, allowing up to 50% manure in compost piles---also consider allowing clean culls from off-farm packing facilities
3. Compost used on own farm(s)
4. <=1,000 cubic yards sold or given away
5. Must follow BMPs

Proposed BMPs:

Siting

- Pad – compacted soil, not concrete. Avoid porous soils for pad.
- 100 foot set back from surface water or well
- Prohibit run-on of storm water onto the composting area. This can be accomplished by uphill berming or grading to divert storm water from the site.
- Assure positive grade of the compost surface to avoid standing water on the compost pad.
- Place a filter sock, hay bales, or berm downhill from the compost pile to allow sediments to settle out and filter runoff from the compost pad.

Operation

- Keep the compost area surface clear of compostables, practice clean operations.
- Create piles on a bed of dry, bulking material like straw or wood chips.

- Mix high nitrogen and or wet feedstocks within 24 hours with a bulking material to create a compost mix that has a C:N ratio of >30:1 and a moisture content not to exceed 55%.
- Minimize organics stockpiles during the rainy season. Land apply finished compost and maximize compost feedstock to be placed into the compost system before the start of the rainy season OR Consider seasonal operations, avoid processing during the rainy season (typically defined as October 1 – April 1)
- Create compost feedstock piles and compost piles that are peaked rather than having a flat surface to promote rain water to shed off. This will prevent water from penetrating the pile when the moisture content reaches 55% or higher.
- Use tarps, temporary covers or roof structures to shed rainfall from feedstock receiving areas for compost operations located in high rainfall areas.
- Do not operate equipment on the compost pad when it will create rutting or pumping of the soil.