



CITY OF LEBANON
DEPARTMENT OF PUBLIC WORKS

193 Dartmouth College Hwy
Lebanon, NH 03766

Solid Waste Division

HB 617 – Solid Waste Study Committee

Below is a brief overview of organic waste management in NH and some brief comments submitted by Marc Morgan, Solid Waste Manager for the City of Lebanon.

Composting in New Hampshire

Composting is a natural and biological process. It is not new. Composting has been going on for many many years in the world's forests and wild spaces. Compositing will even take place on the roof of buildings.

The idea of composting that we are discussing, however, is in regard to how we can take advantage of this biological process to minimize the impacts of our waste on the created world around us. The process of composting simply breaks down organic wastes and transforms them into a usable product that can be used locally: soil.

Compostable wastes include a variety of items: typical food scraps are obvious; also, bread, meat and dairy; off spec food items; expired food items; manures; human waste (sludge); paper fibers; wood ash from biomass plants; some commercial agricultural wastes. This is not an exhaustive list.

In NH, composting is regulated in a variety of ways. In 1991, NH redefined solid waste and excluded yard waste. This resulted in a "disposal ban". It also created a situation where NHDES now has no regulatory authority over yard waste composting operations; because it is no longer a solid waste. It did result in material be redirected from incinerators and landfills; improving capacity.

Organic waste can be composted at the site of generation without a permit. This also allows for some creative opportunities; however, many organic waste generators are looking to move waste off site NOT manage it. There are few generators taking advantage of this option.

Simply composting bakery waste, fruit and vegetable scraps from offsite generators requires a permit by notification. You are limited to what is acceptable. Staff must be trained. The facility must comply with NHDES universal facility requirements; something that can seem burdensome for some small-scale operations. This is a simple application, however, there are some hang ups with managing organic waste; even at a small scale. The hang up is NOT with the Waste Division; it is the Water Division. Since you are potentially generating leachate, the facility requires a ground water discharge permit, and this can get expensive. Monitoring wells, sampling and testing can put people off.

A standard permit is required to manage a broad spectrum of organic waste such as meat and dairy. This full permit application is very expensive and prohibitive for a small operation or municipality.

Anaerobic digestion could be an option for NH organic wastes. There are no digestors in NH currently managing organic waste. There are some operations used for onsite use: Anheuser – Busch in Merrimack.

Compostable waste makes up approximately 30% of what is being put in landfills. The decomposition contributes to greenhouse gases, it could easily be diverted and is a waste of useable resources that could aid in improving poor soils.

There are few composting operations in NH, diverting organic wastes from landfills and incinerators. The current regulations for operating a compost facility are burdensome for operators. Those burdens include: engineering costs for facility plans, closure costs to set aside as required, groundwater monitoring and all it entails, reporting and maintaining a facility in accordance with NHDES regulations.

There are only a few active composting operations in NH. The City of Lebanon receives food scraps from area institutions and commercial customers. We are working on a food waste drop off option for residents. Seacoast Farms in Fremont also manages food scraps and yard wastes. Organics are also managed at the site of generation at schools and backyard composting at our homes.

City's like Portsmouth and Keene have private collection services, but that material is exported to neighboring states because meat and dairy composting requires a higher level of regulatory oversight. Our neighbors are allowing composting to expand so long as sites are employing Best Management Practices and participating in ongoing training. Vermont has a Compost Operator Training Program and Maine has the Maine Composting School. Both of our neighbors developed a plan to expand this industry. They utilized farmers with soil knowledge and equipment to advance this diversion opportunity.

NH lost its edge years ago. We were working to grow this industry more than a decade ago. Then due to budget cuts and layoffs; the NH Recycling Markets Coordinator at DRED was eliminated; the Planning Community Assistance Section at NHDES was reorganized (that is where the Recycling Coordinator for NH resided) and lastly the NH Compost Team (made up of Dept of Ag, UNH Coop Ext and NHDES staff) was also reduced due to lack of support and layoffs.

Currently, NHDES is reviewing the composting regulations. This is the second time in the past 12 years that this process has taken place. Unfortunately, necessary changes did not take place in the last rule rewrite. This time around seems to have stalled due to staffing needs.

Going forward, NH needs to support this waste diversion activity to preserve valuable disposal capacity, better manage resources and ensure the quality of the environment we have grown to enjoy. Composting is simple. I have witnessed some amazing composting operations in our neighboring states that NH would never allow. With competent operators utilizing techniques and participating in ongoing training; these operations divert large amounts of waste from disposal.

Pilot projects are not needed. There are many great examples throughout the Northeast and nation-wide to look at for ideas. Composting meat and dairy is not difficult and with the move towards compostable dinnerware; it is time to look at expanding this industry in NH and realize that waste is changing. Good models can be seen in Maine and the US Composting Council has template rules available for regulators.

With global recycling markets in a process of correcting themselves and a focus on domestic opportunities on the horizon; composting and organics diversion is well suitable to reduce waste locally and marketed locally.

Respectfully submitted,

Marc Morgan

Solid Waste Manager

City of Lebanon