memorandum

To:        Canute Dalmasse, Commissioner
Thru:      Marilyn Davis
From:      Catherine Jamieson
           Roger Thompson
Date:      December 14, 2000
Re:        Disposal Options for Compost Toilet Waste

We reviewed the question of what permits are required for the operation of composting toilets in Vermont, and in particular the disposal of the “compost” that is the end product.

1. The first principle we agreed on was that the “compost” must be treated as pathogenic until proven otherwise with a site specific operation that ensures time and temperature for each particular pile of material.

2. The material from composting toilets cannot be applied to the surface of the land without a Residuals Management approval, because of the pathogen issues.

3. The “compost” can be disposed of using shallow burial, with the site selection criteria being those for location of a leachfield, as a condition of a Subdivision or Water Supply-Wastewater Disposal Permit without needing an additional Residuals Management approval. The permit will require a minimum of 6” of cover material and will prohibit growth of crops for direct human consumption for a minimum of 38 months from the last disposal event in that area.

4. “Compost” can be sent to a certified landfill for disposal or to a wastewater treatment plant where it must be treated in accord with the Solid Waste Management Rules and Certification prior to any land application.