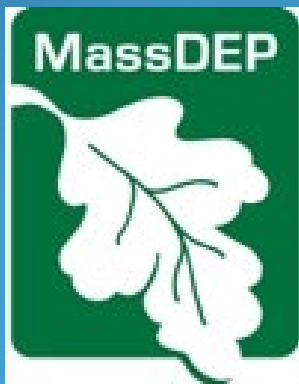


Draft Guidance Cannabis Solid Waste Disposal

John Fischer, Mass DEP
Cannabis Control Commission
Energy & Environment Working Group
January 25, 2019



Energy and Environment Working Group

- Charged with making recommendations to Cannabis Control Commission on implementing guidance
- This presentation focused on solid waste disposal guidance

MA Solid Waste Background

- Dispose about 5.5 million tons of trash/year
- 7 waste to energy facilities and 10 active landfills
- 8 MRFs (material recovery facilities)
- > 200 waste transfer stations
- > 200 compost operations, most are municipal leaf and yard waste operations
- About 25 compost operations, 9 anaerobic digestion facilities, and 7 processors that take food materials
- MassDEP regulates facilities, but not waste haulers
 - DAR regulates agricultural compost operations

Regulatory Requirements

- 935 CMR Cannabis Control Commission
- Adult Use of Marijuana
- 500.105(12) Waste Management Requirements
- MassDEP waste ban regulations (310 CMR 19.017)
 - Materials banned from disposal
 - Includes “commercial organic material” and leaves & yard waste
 - Marijuana plants would fall under “commercial organic material”
 - Only banned from disposal if > 1 ton/week



Storage

- Storage requirements – 935 CMR 500.105(11)
- Security requirements – 935 CMR 500(110)
- Separate storage area for cannabis wastes
- Should be stored in secure area and/or in locked containers until collected
- Waste hauler can help you determine container needs and methods to secure containers
- Typically will be wheeled carts or dumpsters

Compost or Digestion

- Marijuana waste ground up/shredded and mixed with other organic materials to render cannabis unusable
 - Could include stalks, roots, cuttings, etc.
 - Can mix with materials such as growing media, soil, food material, manure, compost, sawdust
- Then may be sent to any compost or AD facility in compliance with MassDEP regulations
- Could also be composted on site

Disposal

- Marijuana waste ground up and mixed with solid waste to render cannabis unusable
- Mix with material such as food waste, manure, soil, sand, kitty litter, coffee grounds
- Then may be sent to any solid waste facility in compliance with MassDEP regulations

Documentation

- Collection must be witnessed by two marijuana agents (employees of marijuana cultivator/establishment)
- Must keep records for at least three years
 - Agents witnessing management (with signatures)
 - Type & quantity of material managed
 - Date & time of collection
 - Hauler that collected (unless self haul)
 - Name, location, and facility type delivered to
- Haulers can provide documentation of delivery receipt to facilities

Resource Links

- To find a hauler or facility
 - <https://recyclingworksma.com/>
 - <https://www.mass.gov/lists/massachusetts-landfills-transfer-stations-compost-sites-recycling-facilities>
 - <https://www.mass.gov/files/documents/2018/11/20/fdcomlst.pdf>
- Haulers can help to determine what facility to haul to based on location

Assistance

- Recycling Works in Massachusetts
 - Business recycling and waste reduction assistance program
 - Fully funded by MassDEP
 - Can help waste generators find solutions
 - Also provide compost site technical assistance
 - www.recyclingworksma.com
 - 1-888-254-5525
 - info@recyclingworksma.com

Solid Waste Contact Information

- John Fischer, MassDEP
- 617-292-5632
- john.fischer@mass.gov

Hazardous Waste Disposal

- May include materials such as spent lighting, pesticides, solvents, cleaners and other chemicals used in facility operation
- Massachusetts Hazardous Waste Regulations – 314 CMR 30.000 - see <https://www.mass.gov/regulations/310-CMR-30000-massachusetts-hazardous-waste-regulations>
- Contact – James Paterson, 617-556-1096, james.paterson@mass.gov

Wastewater Discharges

- Depends on how managed
 - Sewer connection, holding tank, groundwater or surface water
 - <https://www.mass.gov/regulations/314-CMR-12-operation-maintenance-and-pretreatment-standards-for-wastewater-treatment>
 - <https://www.mass.gov/regulations/314-CMR-7-sewer-system-extension-and-connection-permit-program>
 - <https://www.mass.gov/regulations/314-CMR-18-industrial-wastewater-holding-tanks-and-containers>
 - <https://www.mass.gov/service-details/the-groundwater-discharge-permitting-program>
 - <https://www.mass.gov/regulations/314-CMR-3-surface-water-discharge-permit-program>