## DOAG and DEEP answers to questions regarding Voluntown HPAI composting site April 24, 20023

- 1) What is the minimum acreage required for a composting site?
  - The minimum acreage required for a "worst-case scenario" HPAI outbreak would be approximately 48 acres. This would include approximately 20.6 acres for on-farm composting and 27.7 acres of off-farm composting. There is a minimum requirement of one (1) acre per 121,500 carcasses per the 2017 Avian Influenza Monitoring and Response Plan pg. 133 ("2017 HPAI Plan" <u>EHSP0001-AIMRP2018.pdf (ct.gov)</u>). Consideration must also be given for stockpile areas of carbon sources. These numbers take into account the aisle space that is needed to allow access by emergency response personnel and equipment.
  - Compost sites, both on-farm and off-farm, would be managed by USDA and subject matter experts.
  - a. Dimensions of compost windrows.
  - The length of compost windrows would vary based on the layout of each specific compost site. Windrow height is limited to six feet (6 ft.) as specified in the Avian Influenza Monitoring and Response Plan. The base or width of a windrow would be between twelve feet (12 ft.) and sixteen feet (16ft). There shall be twenty feet (20 ft.) between windrows to allow for proper management. Windrows shall be constructed perpendicular to the contours of the ground surface. These values are found in the 2017 HPAI Plan pg. 135 and from experience Hillandale has with handling mortalities via composting.
  - b. <u>Based on what volume?</u>
  - There is an approximate total volume of 12,570 cubic yards of birds in Connecticut that would need to be composted in a "worst-case scenario" (approximately 5.8 million birds).
- 2) What are the other site criteria that DEEP staff used for site analysis?

The <u>Regulations of Connecticut State Agencies Section 22a-208i(a)-1</u> provides the siting requirements for leaf composting facilities that DEEP applies to all composting facilities.

- a. <u>Wetlands</u>
- Two hundred feet (200 ft.) from wetlands
- b. <u>Slopes</u>
- Slope range of no less than two percent (2%) and no greater than five percent (5%).
- c. <u>Ownership</u>
- If the proposed site for composting is privately held, then a lease agreement must be submitted as a requirement of solid waste authorization.
- d. Minimum acreage
- See #1 above, first bullet.
- e. Property restrictions
- Some properties have federal funding restrictions such as Franklin Wildlife Management Area and Quinebaug Wildlife Management Area. Environmental restrictions some areas may not be suitable due to not meeting the metrics outlined here. There may be transportation restrictions based on biosecurity measures.
- f. Buffer distances from populations, other poultry operations, etc.
- Not in a floodplain
- Not within an area where bedrock lies less than forty-eight inches (48") below the ground surface
- One thousand feet (1,000 ft.) from a water supply well
- 200 ft. from surface and water bodies
- 200 ft. from a drainage swale that leads to a water body
- Twenty-five feet (25 ft.) from a drainage swale that does not lead to a water body

- A minimum of 1,000 ft. from the nearest residence, school, hospital or other institution housing a human population.
  - It was identified in the 2017 HPAI Plan, pg. 133, that the site(s) selected should be as close as possible to the affected chicken farm to minimize the potential spread of HPAI.

RCSA Sec. 22a-208i(a)-1 is the DEEP regulation that governs siting of composting sites.

- 3) <u>Have the Hillandale Farm facilities demonstrated they DO NOT have sufficient space? (see attached GIS</u> <u>sketches)</u>
  - Hillandale has identified they are able to complete on-farm composting at Bozrah Schwartz Road, Brush Hill Road, Lebanon Mack Road and Goshen Hill Road. They can account for approximately 11,620 total feet of windrows, which could hold approximately 2.5 million carcasses.
  - There is a remaining approximately 14,910 feet of windrow composting that would need to be accounted for at off-farm locations to handle the remaining approximately 3.4 million carcasses.
- 4) The plan mentions compensation to the farm, but nothing regarding compensation for any impact on the Town of Voluntown (roads, transfer station usage, access to public works area). What will that compensation be?
  - There are not currently any state funds identified for this purpose. It is possible that should any damage occur due to the truck traffic, that a town could apply for a STEAP Grant at that time.
- 5) Why can't DOAG require the commercial producer to do composting on their site rather than in our state forest?

Please see our response to question 3.