



## Department of Natural Resources

### Five-Year Rule Review Worksheet

#### Phase 2 - Part C

#### BASIC INFORMATION

Date Part C Review Concluded: December 1, 2014

Reviewer Name(s): Chad Stobbe, Susan Johnson, Theresa Stiner, Amie Davidson

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Chapter<sup>1</sup> Number: Chapter 105

Chapter Name: Organic Materials Composting Facilities

#### 1. DOES THIS CHAPTER<sup>2</sup> DO THE JOB IT SETS OUT TO DO?

1a. Is this chapter effective at protecting the health, welfare, and safety of Iowans and our natural resources?

Yes

No

(check or circle)

1b. Explain how the chapter protects the health, welfare, and safety of Iowans and our natural resources.

The intent of this administrative chapter was to ensure that compost operations are carried out in a manner that is protective of human health and the environment, by addressing the various types of composting and level of regulation, if any. This administrative chapter includes siting, design and operation requirements, as well as best management practices described in the most recent version of the Compost Facility Operating Guide published by the United States Composting Council.

<sup>1</sup> If the Phase 1 Worksheet addresses a portion of a chapter, rather than a whole chapter, then this follow-up worksheet should address the same portion of the chapter (e.g. rule or rules, paragraph, etc.).

<sup>2</sup> Throughout this worksheet, the word "chapter" is meant to apply to the chapter or portion of a chapter to which the worksheet applies.

## 2. IS THERE LEGAL AUTHORITY FOR THIS CHAPTER?

2a. Is the chapter intended to implement any state statutes?

Yes  No  (check or circle)

*If this chapter is intended to implement any state statutes, then answer questions 2b and 2c. If not, then proceed to question 2d.*

2b. Provide citations for the specific provisions of the Iowa Code implemented by this chapter.

At the conclusion of this administrative chapter there is a chapter implementation sentence that states, "These rules are intended to implement Iowa Code sections 455B.304 and 455D.9."

[Iowa Code section 455B.304](#) - 455B.304(1)

[Iowa Code section 455D.9](#) – 455D.9(1) through (3)

[Iowa Code section 455B.306](#) - 455B.306(7)"a" and 455B.306(9)"a", "c" and "d"

2c. Provide a narrative summary of how the state statutes are implemented by this chapter.

This administrative chapter directly implements the provisions of Iowa Code section 455D.9(3), in that it provides exemptions, permit-by-rule and individual facility permits to ensure the safe and proper method of composting of solid and yard wastes. In addition, while there are specific rules within this administrative chapter that have direct statutory authority, many requirements are based upon the broad authority given under Iowa Code section 455B.304(1) to adopt rules for the proper administration of Division IV "Solid Waste Disposal," Part 1 "Solid Waste." Within the examples given in Iowa Code section 455B.304(1) is the authority to establish rules for "the issuance of permits." In addition, Iowa Code sections 455B.306(7) and (9) address proper site closure and postclosure care, emergency response planning and financial assurance coverage requirements applicable to SDPs.

2d. Does the chapter implement any federal statutes or regulations?

Yes  No  (check or circle)

*If this chapter is intended to implement any federal statutes or regulations, then answer questions 2e and 2f. If not, then proceed to question 3.*

2e. Provide citations for the specific provisions of federal statutes and regulations implemented by this chapter.

The federal government does not regulate composting, except for biosolids composting in 40 C.F.R., Part 503 under the Clean Water Act.

2f. Provide a summary of how federal statutes and regulations are implemented by this chapter.

The DNR has received delegation of permitting authority for 40 C.F.R., Part 503, which is

administered pursuant to 567 IAC 67. While 567 IAC 105 does not directly implement the provisions of 40 C.F.R., Part 503, there are provisions of 567 IAC 67 that place additional requirements upon facilities that manage biosolids (i.e. sewage sludge) as part of their composting activities (i.e. Processes to significantly reduce pathogens (PSRP) and Processes to further reduce pathogens (PFRP)). 567 IAC 105.1(2)“c” states in part, “Solid waste composting facilities involving municipal sewage sludge shall also operate in conformance with 567— Chapter 67.”

### 3. DOES THE CHAPTER GO BEYOND FEDERAL LEGAL REQUIREMENTS?

3a. Is this chapter more stringent than federal statutory or regulatory requirements?

Yes  No  Not Applicable  (check or circle)

*If the answer is “yes,” then answer question 3b. If not, then proceed to question 4.*

3b. Provide a narrative statement regarding how this chapter is more stringent than required by federal statutes and regulations, and a short justification of why it is more stringent.

The applicable provisions of 567 IAC 67 that are referenced in 567 IAC 105.1(2)“c” are pulled verbatim from 40 C.F.R., Part 503 (i.e. Appendix B to Part 503 – Pathogen treatment processes) Furthermore, courts have held that, if there is no comparable federal requirement, then by definition the state rule is not more restrictive than the federal rule. See example Friends of Agric. For the Reform of State Entl. Regulations v. Zimmerman, 51 S.W.3rd 64 (Mo.Ct.App 2001). Additionally, the limited federal case law indicates that state rules are not considered more restrictive than the federal solid waste regulations if they merely describe the “manner” to be used to comply with the federal rule. Covington v. Jefferson County, 358 F.3d 626, C.A.9 (Idaho) 2004.

### 4. DOES THIS CHAPTER HAVE UNINTENDED CONSEQUENCES?

4a. Does the chapter result in the equitable treatment of those required to comply with it?

Yes  No  (check or circle)

4b. Provide a narrative summary of your response.

The total amount and type of waste managed determines the level of regulatory oversight by the DNR. There is limited basis for the current two ton per week permit exemption for small composting facilities receiving yard waste and food residuals. As a result, an entity composting 2.1 tons must obtain a permit, regardless of whether or not there is an appreciable increase in environmental risk from exceeding the two ton per acre per week exemption. Furthermore, food waste composting requires a permit, but yard waste composting is exempt so long as certain operational requirements are met.

4c. Does the chapter result in the inequitable treatment of anyone affected by the chapter but

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not required to comply with it?

Yes  No  (check or circle)

4d. Provide a narrative summary of your response.

None Known

4e. Are there known negative unintended consequences of this chapter?

Yes  No  (check or circle)

*If the answer is "yes," then answer question 4f. If not, then proceed to question 5.*

4f. Specifically state the nature of any negative unintended consequences.

A case can be made that composting does not facilitate the final disposition of solid waste, but rather is a form of recycling and therefore does not require an SDP permit. This position is supported to some extent by the definition of "recycling" in 567 IAC 100.2, where it states in part, "Recycling includes, but is not limited to, the composting of yard waste which has been previously separated from other waste and collected by the sanitary facility." However, it's unclear whether the composting of other solid wastes should be defined as recycling or should be further regulated by the DNR. In conflict with this are the numerous instances within this administrative chapter where the composting permit is referred to as an SDP permit, or certain permitting requirements only applicable to SDPs are being required of composting operations.

In addition, facilities that accept strictly yard waste are exempt from permitting, regardless of the amount of material accepted for management. However, if that same facility accepts more than two tons per week of food waste, they lose the exemption and must obtain a permit. This has discouraged composters from accepting food waste for management.

## 5. CAN THE GOALS OF THE CHAPTER BE ACHIEVED IN A MORE EFFICIENT OR STREAMLINED MANNER?

5a. Is the chapter broader than necessary to accomplish its purpose or objective?

Yes  No  (check or circle)

5b. Provide a narrative summary of your response.

As indicated above, a case can be made that composting does not facilitate the final disposition of solid waste, but rather is a form of recycling and therefore does not require an SDP permit. Regardless of the material being composted, Iowa Code section 455D.9(3) does not mandate the DNR develop a permitting program to ensure the safe and proper method of composting.

5c. Is the purpose of this chapter achieved in the least restrictive manner?

Yes  No  (check or circle)

5d. Provide a narrative summary of your response.

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Current permitting efforts may be better capitalized by expanding education and technical assistance efforts to existing compost facilities, entities interested in starting a compost operation and local governments where these facilities reside. If it's determined that continued regulatory oversight via a permit is warranted, perhaps an expanded permit-by-rule approach could be established to streamline the process. Additional allowances could also be made for the expanded acceptance of food waste by all types of composting operations.

5e. What, if any, reasonable and practical alternatives to this chapter are available by the agency?

- Historically, problems associated with compost facilities were typically nuisance odor or storm water/wastewater related, all of which fall outside the regulatory authority of the DNR's Solid Waste section. To address many of the nuisance concerns, perhaps an alternative to explore further would be to exempt those that operate in an enclosed structure with a liquids collection system from having to obtain an operating permit.
- Rather than a regulatory effort focused primarily upon facility permitting, perhaps DNR resources could be focused more on expanded education and technical assistance to compost operations to avoid those common management issues (e.g. odor, runoff, compost leachate lagoon management) brought to local and state officials.
- Further dialogue with our counterparts at the Iowa Department of Agriculture and Land Stewardship (IDALS) is necessary to identify any areas of regulatory overlap regarding composting and the management of dead farm animals. While 567 IAC 105.6 sets forth specific requirements for the composting of dead farm animals, Iowa Code chapter 167 and 21 IAC 61 set forth IDALS's authority over dead farm animal disposal. In addition, if the compost is offered for sale as a soil conditioner or fertilizer, the compost must be registered by IDALS pursuant to Iowa Code chapter 200.
- If food waste were better defined, there may be opportunities to include this waste stream within the current permit-by-rule requirements for yard waste composting. Doing so may encourage more local governments to divert food waste from landfills through local composting operations.
- Another option is to differentiate between the types of composting feed stocks and the various methods of composting in order to promulgate appropriate regulations for each, rather than a common set of requirements applicable to all composting operations that may actually be limiting to certain operations.

5f. How do the economic and social costs of various alternatives to this chapter, if known, appear to compare to the known economic costs of this chapter?

A discussion should be had with local communities and businesses to determine whether the existing regulations and the costs associated with compliance are a deterrent to operating a compost facility. Facilities accepting food waste are limited to accepting only two tons of food waste and yard waste combined per week without having to go through the regulatory process of obtaining an SDP permit. Exceeding this limited tonnage threshold and having to navigate

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the permitting process has likely discouraged food waste composting operations from starting, and current operations from expanding.

5g. Do the known economic costs of the chapter outweigh the known economic and social benefits?

Because the practice of composting has been considered a sanitary disposal project in regards to permitting requirements (e.g. financial assurance, emergency response and remedial action plans) the costs associated with complying with those requirements may not be necessary. In addition, the costs associated with a permitted facility, such as a wastewater collection and treatment system or hard-surface composting pad construction may outweigh the benefits for such wastes as food scraps.

## 6. DOES THE CHAPTER AFFECT BUSINESS OR INDUSTRY?

6a. Does the chapter affect businesses operating in Iowa?

Yes  No  (check or circle)

*If the answer is "yes," then answer questions 6b through 6i as applicable. If not, then proceed to question 6f.*

6b. What kinds of businesses are affected by this chapter?

Any public or private entity that composts organic materials (e.g. yard waste, food waste, industrial waste, dead farm animals).

6c. Does this chapter create a burden for businesses?

Yes  No  (check or circle)

6d. Explain your response to question 6c.

If composting is not considered final disposition, then requiring an SDP permit is an added cost that would otherwise not be necessary. The costs associated with a permitted facility, such as a wastewater collection and treatment system or hard-surface composting pad construction may outweigh the benefits for composting such wastes as food scraps.

*If the answer to question 6c is "yes," then answer question 6e. If not, then proceed to questions 6f through 6i.*

6e. If this rule does create a burden for businesses, what options are available to address those burdens?

As indicated above, a case can be made that composting does not facilitate the final disposition of solid waste, but rather is a form of recycling and therefore does not require an SDP permit. Regardless of the material being composted, Iowa Code section 455D.9(3) does not mandate the DNR develop a permitting program to ensure the safe and proper method of composting. As such, many of the alternatives provided in response to question 5e above could alleviate

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much of the burden upon businesses that undertake composting operations.

6f. Do industry standards affect the subject matter of this chapter?

Yes  No  (check or circle)

*If the answer is "yes," answer questions 6g through 6i as applicable. If not, proceed to question 7.*

6g. Have industry standards changed since the adoption of this chapter?

Yes  No  (check or circle)

*If the answer is "yes," answer questions 6h and 6i. If not, proceed to question 7.*

6h. What industry standards have changed since the adoption of this chapter?

More focus is being placed on diverting organics and food waste from landfills than in the past.

6i. Would revision of the chapter be useful in implementing the purposes of the chapter in light of any industry standard revisions? (Cite the portions of the chapter that could be revised.)

567 IAC 105.5(1) could be revised to allow more food waste to be accepted without triggering a permit and its associated design and operating costs.

## 7. DOES THIS CHAPTER AFFECT JOB CREATION?

7a. Does the chapter affect job creation?

Yes  No  (check or circle)

*If the answer is "yes," then answer questions 7b and 7c. If not, then proceed to question 8.*

7b. If this chapter affects job creation, in what manner does that occur?

Not Applicable

7c. If this chapter is required by state or federal statutes, or federal regulations, how has the department minimized negative job impacts?

Not Applicable

## 8. IS THERE ANY DOCUMENTATION OR PAPERWORK REQUIRED BY THIS CHAPTER?

8a. Is there any documentation or paperwork required by this chapter?

Yes  No  (check or circle)

*If documentation or paperwork is required, then answer questions 8b through 8e. If not, then*

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*proceed to question 9.*

8b. What is the purpose of the documentation or paperwork?

The rules within this administrative chapter require the submittal of paperwork pertaining to minimum permit application requirements and subsequent permitting actions that are found in nearly all solid waste administrative chapters.

8c. Who reviews the paperwork required by the chapter?

DNR central office program staff and field office staff review permit applications, annual reports and site inspection reports to ensure compliance with regulations and to ensure such activities are protective of human health and the environment. The minimum permit application and management plans required in this administrative chapter serve as the basis for permit issuance and documentation of compliance with operating requirements.

8d. How is the documentation or paperwork required by this chapter informative or useful for the public?

Because all paperwork is made public, it provides transparency and a level playing field for all required to comply with this administrative chapter. The submitted documents contain information regarding the location of the composting operation, annual capacity of the facility, method of composting employed, materials accepted and the responsible party. This information is useful to solid waste planning areas, local governments and the general public in identifying local resources for the proper management of their organics.

8e. How, if possible, can the documentation or paperwork requirements be reduced?

There are several opportunities to streamline the permitting process; either through the issuance of "general permits," through a broader permit-by-rule approach to regulatory oversight, or by removing the permitting component altogether and focusing more on expanded education and technical assistance to compost operations. Opportunities exist to restructure and simplify the required plans that must accompany each permit application, and opportunities to reduce paperwork through streamlining and standardizing of the application and reporting requirements (e.g. online application and reporting). Many of the alternatives provided in response to question 5e above reduce the paperwork required by this administrative chapter.

## 9. DO OTHER STATE AGENCIES REGULATE THE ISSUES ADDRESSED BY THIS CHAPTER?

9a. Do any other state agencies regulate any issue(s) addressed by this chapter?

Yes  No  (check or circle)

*If the answer is "yes," then answer questions 9b and 9e. If not, then proceed to question 10.*

9b. If other state agencies regulate any issue(s) addressed by this chapter, provide the name of each agency, a description of how each agency is involved, and specify the subject matter regulated by each agency.)

While 567 IAC 105.6 sets forth specific requirements for the composting of dead farm animals, Iowa Code chapter 167 and 21 IAC 61 set forth IDALS's authority over dead farm animal disposal. If the composting of solid waste is deemed "recycling" and not "facilitating the final disposition of solid waste," there should be no duplication or conflict between IDALS's regulations governing dead farm animal disposal and the DNR's regulations governing dead farm animal composting. At issue in 567 IAC 105 is that solid waste composting is referred to as an SDP (i.e. facilitates the final disposition of solid waste).

9c. Is there a need for more than one set of rules?

Yes  No  (check or circle)

*If the answer is "yes," then proceed to question 9d. If not, then proceed to question 9e.*

9d. If any other state agencies regulate any issue(s) addressed by this chapter and one or more of the other sets of rules are necessary, explain why.

IDALS's regulatory authority pertains to the disposal of dead farm animals; whereas the DNR's regulatory authority pertains to the composting of dead farm animals.

9e. If this chapter or a portion thereof is duplicative, explain how and why.

If the composting of solid waste is deemed "recycling" and not an SDP (i.e. facilitating the final disposition of solid waste), there should be no duplication between IDALS's regulations governing dead farm animal disposal and the DNR's regulations governing dead farm animal composting. However, at issue with this is that solid waste composting in 567 IAC 105 is referred to as an SDP.

## 10. IS THE CHAPTER USER FRIENDLY?

10a. Is the chapter written and organized in a clear and concise manner so that those to whom it applies can readily understand it?

Yes  No  (check or circle)

*If the answer is "no," then answer question 10b. If not, then proceed to question 11.*

10b. If not, explain what changes can be made to improve readability, eliminate ambiguity, or increase understanding. Be specific, to the extent possible.

Beyond the fundamental question of whether composting is "recycling" or an activity that warrants permitting as an SDP, there are several opportunities to consider in addressing the ambiguity within this administrative chapter. They include:

- 567 IAC 105.1(2)"c" – Requiring a permit from the DNR could be revised to allow for a

permit-by-rule approach to oversight.

- 567 IAC 105.3 - The general requirements for all composting facilities not exempt pursuant to 567 IAC 105.2 could be revised to apply to only certain types of composting operations, as some of the requirements could be considered excessive for some operations (e.g. food waste composting).
- 567 IAC 105.3(3) – States that measures shall be taken to prevent water from running onto the facility from adjacent land and to prevent compost leachate and runoff from leaving the composting facility. Runoff from the composting facility must be properly managed. The first sentence of this subrule prevents run-on and runoff and the second sentence implies it is allowed by saying that runoff must be properly managed.
- 567 IAC 105.3(7) - States that material shall be managed in accordance with best management practices (BMP). It may be good to utilize an education and outreach approach to assist facilities in implementing these BMPs.
- 567 IAC 105.7 & 105.8 - The permit requirements of these two rules could be revised to a permit-by-rule approach, which would be less prescriptive than what’s currently required (e.g. haul routes, flow diagram of all operating steps).
- 567 IAC 105.3 - It’s confusing that certain yard waste composting facilities and dead farm animal composting facilities are exempt from a permit by adhering to 567 IAC 105.3, which is titled “General requirements for all composting facilities not exempt pursuant to 105.2(455B,4555D)”. Seems that if these operations are exempt, this should be expressed under 567 IAC 105.2 (specifically 567 IAC 105.1(2)“b”).
- 567 IAC 105.3 - This rule could be titled “General requirements for all composting facilities” and remove “not exempt pursuant to 567 IAC 105.3.” It is stated in 567 IAC 105.1(2)“b” that those exempt operations must also operate in accordance with this rule, which is for those not exempted pursuant to 567 IAC 105.2.
- 567 IAC 105.2(1) and 105.2(3) – These provisions allow for permit exemptions for certain organics composted and used “on the same premises where they originated.” Clarification is needed as to the actual site generated or site(s) under the ownership of the generator.
- 567 IAC 105.7(4) speaks to composting facilities being issued an SDP permit. However, Iowa Code section 455B.304(1) speaks to permits in a general sense and not just limited to SDPs. At several locations within this administrative chapter, compost permits are referred to as SDPs when they should not be. If they are SDPs, then waste flow and comprehensive plan inclusion is required (see 567 IAC 105.7).
- 567 IAC 105.1(3) states that “Yard waste accepted by a sanitary landfill for the purposes of

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soil conditioning shall be used only on finished areas of the landfill that have received the final earthen cover, developed areas with intermediate cover, and restoration of soil borrow areas.” It’s unclear what regulation(s) soil conditioning is to be done in accordance with. 567 IAC 105.1(5) only speaks to land application. Mature compost meeting the Test Methods for the Examination of Composting and Compost (TMECC) standards should not warrant regulatory oversight.

- 567 IAC 105.3 states in part, “Facilities exempt from permitting that do not operate in accordance with this chapter may as a result be required to obtain a solid waste composting permit.” Facilities exempt from permitting are by definition exempt from this administrative chapter, so stating that they may now be required to obtain a permit is contradictory. Perhaps further clarification is needed regarding the criteria that must be met in order to maintain the permit exemptions in 567 IAC 105.2.
- 567 IAC 105.4 states in part that “facility operators are encouraged to be trained, tested, and certified...” The DNR needs to either require a testing/certification program or remove this provision. Simply encouraging a particular action is not enforceable. The same applies to 567 IAC 105.6 and 105.6(1), where it states that operators are encouraged to be trained, tested, and certified by a department-approved certification program.
- 567 IAC 105.6(2) speaks to the requirements for composting of dead farm animals. Adding a reference to Iowa Code chapter 167 regarding the disposal of dead farm animals could provide additional clarification.

## 11. ARE THE CITATIONS IN THE CHAPTER ACCURATE?

11a. If this chapter contains Iowa Code citations, are those citations proper and current?

Yes  No  Not Applicable  (check or circle one option)

*If the answer is “no,” then answer question 11b. If not, then proceed to question 11c.*

11b. If not, list and explain the corrections that need to be made to the Iowa Code citations.

Not Applicable

11c. If this chapter contains federal statutory citations, are those citations proper and current?

Yes  No  Not Applicable  (check or circle one option)

*If the answer is “no,” then answer question 11d. If not, then proceed to question 11e.*

11d. If not, list and explain the corrections that need to be made to the federal statutory citations.

Not Applicable

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11e. If this chapter contains federal regulatory citations, are those citations proper and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11f. If not, then proceed to question 11g.*

11f. If not, list and explain the corrections that need to be made to the federal regulatory citations.

Not Applicable

11g. If this chapter contains internal cross-reference citations, are those citations correct and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11h. If not, then proceed to question 11i.*

11h. If not, list and explain the corrections that need to be made to the internal cross-references.

Not Applicable

11i. If the chapter contains cross-reference citations to other chapters or outside sources, are those citations correct and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11j. If not, then proceed to question 11k.*

11j. If not, list and explain the corrections that need to be made to the cross-references to other chapters or outside sources.

Not Applicable

11k. If this chapter contains website references, are those website references necessary, correct and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11l. If not, then proceed to question 11m.*

11l. List and explain any necessary corrections to the website references.

Not Applicable

11m. If the chapter contains addresses and phone numbers, are the addresses and phone numbers necessary, correct and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11n. If not, then proceed to question 11o.*

11n. List and explain any corrections that need to be made to the addresses and phone numbers contained in the chapter.

Not Applicable

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11o. If the chapter contains adoptions by reference, are those adoptions by reference correct and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11p. If not, then proceed to question 11q.*

11p. List and explain any corrections that need to be made to update adoptions by reference.

567 IAC 105.14(5)“f”(5) refers to Government Accounting Standards Board (GASB) Statement 18. GASB 18 pertains only to accounting standards for municipal solid waste landfill closure and postclosure care costs; not any activity this administrative chapter regulates.

11q. If the chapter contains DNR-created documents adopted by references, are those document references necessary, correct and current?

Yes  No  Not Applicable  **(check or circle one option)**

*If the answer is "no," then answer question 11r. If not, then proceed to question 12.*

11r. List and explain any corrections that need to be made to update the DNR-created document references.

567 IAC 105.5(1) and 105.8(1) state the application form is Form 50A (542-1542A), while online the form is noted as 542-1602. 567 IAC 105.7(8) makes reference to Form 50A, but should be more specific, as 542-1602.

567 IAC 105.4(6), 105.5(4) and 105.12 state that the report form is 542-3276C, while online the form is listed as 542-8014. These rule citations need to be updated to reference 542-8014.

## 12. PUBLIC GROUPS AFFECTED BY THE CHAPTER.

12a. List any stakeholder groups, workgroups, public groups or other public participants impacted by the issues in the chapter.

Potential interested parties: Iowa Society of Solid Waste Operations (ISOSWO), Iowa Solid Waste Comprehensive Planning Areas, Association of Business and Industry (ABI), Farm Bureau, Iowa Solid Waste Comprehensive Planning Areas, Iowa Department of Agriculture and Land Stewardship (IDALS), Iowa Environmental Council (IEC), Iowa Recycling Association (IRA), Sierra Club – Iowa Chapter, Iowa League of Cities, Iowa State Association of Counties (ISAC), Iowa Association of Municipal Utilities (IAMU), County Environmental Health Sanitarians, current permitted composting operations.

12b. If any stakeholders have already been included in a review process for this chapter during the past five years, state the names of those stakeholder groups, workgroups, public groups, or other public participants, and explain the nature of their involvement.

External stakeholder feedback has not been sought in the past five years regarding revisions to this administrative chapter.

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