Draft Guidance
Cannabis Solid Waste Disposal

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Energy & Environment Working Group
January 25, 2019
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- 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

- Haulers can help to determine what facility to haul to based on location
Assistance

- RecyclingWorks 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](http://www.recyclingworksma.com)
- 1-888-254-5525
- [info@recyclingworksma.com](mailto: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
- 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-7-sewer-system-extension-and-connection-permit-program](https://www.mass.gov/regulations/314-CMR-7-sewer-system-extension-and-connection-permit-program)
  - [https://www.mass.gov/service-details/the-groundwater-discharge-permitting-program](https://www.mass.gov/service-details/the-groundwater-discharge-permitting-program)
  - [https://www.mass.gov/regulations/314-CMR-3-surface-water-discharge-permit-program](https://www.mass.gov/regulations/314-CMR-3-surface-water-discharge-permit-program)