

McGill facilities operate under permits that do not require regulatory pre-approval or permit modification for each new waste stream accepted for processing. The company's internal pre-acceptance protocols have been approved by the North Carolina Department of Environment and Natural Resources (DENR) for pre-acceptance evaluation.

This review process takes less than 30 days and insures compliance with both regulatory and processing parameters.

During this evaluation, both biochemical and physical characteristics are evaluated, as well as generation rates, materials handling and transportation requirements, etc.

Depending on the waste material, the evaluation may require TCLP (Toxicity Characteristics Leachate Procedure), Total Metals, salts, and other laboratory testing. Bench scale and pilot scale studies may also be conducted.

The following steps make up the pre-acceptance protocol:

### 1. ANALYTICAL REVIEW

In order to insure all finished composts meet or exceed standards for EPA Class A products, no feedstock is accepted by MES that cannot meet the same standard for toxicity, including metals.

In addition to issues related to quality of finished compost products, laboratory tests also provide data related to toxins, corrosivity and ignitability, nutrient content, calcium carbonate equivalency, percent solids, and other factors that influence recipe development and processing.

### 2. BENCH SCALE EVALUATION (optional)

For a new type of feedstock material, a bench scale evaluation may be warranted.

Once analytical standards have been verified, an appropriate quantity of the proposed feedstock is composted to --

- Verify the feedstock is amenable to high rate, aerobic composting;
- Develop a feedstock profile to be used in processing the waste stream; and,

- Test any special amendments, bulking agents, handling, or processing systems that may be required to successfully process the feedstock.

### 3. GENERATOR FILE REVIEW

Once analytical compliance has been verified and bench scale studies successfully completed, McGill conducts a review of the generator's file located in the offices of the agency of regulatory jurisdiction.

Purpose of this procedure is to verify that the analyses provided by the generator for pre-acceptance are historically representative and consistent, and that there are no variations or fluctuations in feedstock quality that might adversely affect McGill's ability to process the waste or find beneficial reuse for the resulting compost product(s).

As soon as McGill has completed this evaluation process, the client is notified and transportation of waste materials is initiated according to a mutually agreed schedule.

Generation sources, types and volumes of materials processed, and analytical information are provided to DENR by McGill each year in its annual report.

For more information about McGill pre-acceptance protocols, contact:

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