

GUIDANCE ON WASTE DISPOSAL May 2023

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Introduction

All applicable federal, state, and local statutes, regulations, and ordinances apply to waste disposal from Cannabis Establishments. This includes, but is not limited to, all regulations pertinent to chemical, dangerous, and hazardous waste, such as those that may be generated during product manufacturing processes, as well as all pesticides and other agricultural chemicals.

Cannabis waste, like other crop wastes that are compostable, untreated vegetative material are banned from landfills. However, if composters won't or can't accept the material because it has been treated or is invasive, diseased, or may contain dangerous or hazardous substances, then it could be disposed of in the trash or a landfill as a last resort.

Non-Hazardous Waste

The Vermont Agency of Natural Resources, Department of Environmental Conservation considers Cannabis to be 'Leaf and yard residual' material, meaning compostable and untreated vegetative matter – including grass clippings, leaves, kraft paper bags, and brush – which is free from non-compostable materials. It does not include such materials as pre- and post-consumer food residuals, food processing residuals, or soiled paper.

Cannabis and Cannabis Products, meaning all flower, seeds of the plant, the resin extracted from any part of the plant, any compound, manufacture, salt, derivative, or preparation of the plant, its seeds, or resin, as well as, concentrated cannabis products composed of cannabis and other ingredients and is intended for use or consumption, including edible products, ointments, cannabis oil for vaporizer cartridges and tinctures must be rendered unusable and unrecognizable before disposal.

The acceptable methods for rendering Cannabis and Cannabis Product unusable and unrecognizable are:

- i. grinding or compacting Cannabis and Cannabis Product with non-consumable, solid wastes, such that at least 50% of the resulting waste is non-Cannabis waste. This can be done through various methods, such as:
 - a. Paper waste;
 - b. Cardboard waste;
 - c. Food waste;
 - d. Grease or other compostable oil waste;
 - e. Bokashi or other compost activators;
 - f. Soil;
 - g. Sawdust;
 - h. or, Manure
- ii. on-site composting;
- iii. anaerobic digestion;
- iv. burning;
- v. pyrolyze into biochar; and
- vi. biomass gasification

However, the following materials (non-hazardous **ONLY**) shall not be considered cannabis waste requiring treatment to be rendered unusable and may be disposed of in accordance with standard waste disposal regulations:

- A. Root balls, soil, or growing media;
- B. Stalks of cannabis plants; and
- C. Leaves and branches removed from cannabis clones, seedlings, and cannabis plants

PLEASE NOTE: The above materials must be completely free of all cannabis flowers and leaves with any visible trichomes.

Organic material that has either no tetrahydrocannabinol content, or a tetrahydrocannabinol content under 0.3%, doesn't need to be rendered unusable or unrecognizable. It can be composted onsite or disposed of in a manner otherwise consistent with applicable law and regulation.

Hazardous Waste

Hazardous waste must follow the state of Vermont's Department of Environmental Conservation's Hazardous Waste Management Program. Hazardous waste includes:

- i. Discarded process liquids (pesticides, fertilizers, pH adjusters, sanitizers, etc.).
- ii. Spent lighting/indoor grow lamps/bulbs (HID, HPS, MH, fluorescent, etc.) with ballasts.
- iii. Post-extraction cannabis biomass (flower, leaf, trim, shake, etc.) with solvent residuals.
- iv. Post-refinement semi-aqueous byproduct (fat, wax, lipid, terpene, distillate, raffinate, etc.) with solvent residuals.
- v. Disposable items (gloves, PPE, filters, wipes, containers, utensils, etc.) with cannabis and/or solvent residuals.
- vi. Used process liquids (organic solvents, chemical reactants, etc.) with trace cannabinoids.
- vii. Defective, returned, expired, or non-compliant disposable cannabis vape pens with internal lithium-ion batteries
- viii. Disposable items (gloves, PPE, filters, wipes, containers, utensils, etc.) with cannabis and/or chemical residuals.
- ix. Used process liquids (organic solvents, chemical reactants, corrosives, etc.) with cannabis residuals.