

Bulk Product Transfer
Proposals for Regulatory Approaches
For RAC Discussion & Consideration
September 12, 2018

Information to be reported to DNREC

- A. Imports of Bulk Products
 - a. For each bulk product - quantity, dates, final disposition (used on site, shipped off-site)
 - b. Quantity, final destination, and dates of any imported bulk products that are transferred off-site

- B. Exports of Bulk Products
 - a. Quantity, point of origin, and dates of any bulk products to be exported from the site

- C. Question: Should there be reporting requirements for bulk product grain that is imported or exported -
 - a. If it is exported as one of a variety of bulk products shipped to or from a facility?
 - b. If it is the only bulk product shipped from a facility that may otherwise have a conversion permit or coastal zone permit?

Frequency of reporting

- A. Annual reporting of information outlined above

- B. Notification of intent to add a new bulk product import or export 90 days prior to commencement
 - a. Include information on final destination of bulk product to be imported
 - b. Include information on point of origin of bulk product to be exported