

**Bulk Product Transfer**  
**Draft Recommendations**  
For RAC Consideration  
October 9, 2018

Recommendation BPT1: Recordkeeping & Reporting

1.1 The Coastal Zone Conversion Permit Regulations should require that records of the following information be kept on site at the Bulk Product Transfer Facility (BPTF):

- A. For each Bulk Product imported to the BPTF:
  - a. Quantity
  - b. Date of import
  - c. Final destination
    - i. Used on site:
      - 1. Quantity
    - ii. Shipped off-site:
      - 1. Quantity
      - 2. Date of shipment
      - 3. Name and address of final destination
  
- B. For each Bulk Products exported from the BPTF:
  - a. Quantity
  - b. Date of export
  - c. Point of origin, including name and address

1.2 Bulk product transfers of grain should only be required to keep records on the quantities and dates of imports and exports.

1.3 The Coastal Zone Conversion Permit Regulations should require that a summary of the information listed above be submitted to DNREC on an annual basis.

Recommendation BPT2: Bulk Product Categories

2.1 Coastal Zone Conversion Permits should be written to include product categories, so as to minimize the need for permit modification or new permits with minor, related, changes in Bulk Products imported or exported.

2.2 Addition of a new Bulk Product category, not included in the existing permit, may require a permit modification or new permit due to potential impacts on financial assurance or environmental offset.