

Bio Recycling Corporation

Please see comments in uploaded file. Thank you.



1.1.1. – Page 2

Explanation of the Terms “Sewage Sludge”, “Biosolids”, and “Septage” Sewage sludge is the solid, semisolid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Biosolids are produced by treating sewage sludge to meet standards that allow them to be beneficially used for their nutrient and soil conditioning value. Septage is a type of biosolids that comes from septic tanks and similar systems. In this permit, when we use the term septage, we mean only septage. **When a facility mixes septage and biosolids together**, the mixture must be treated to the same standards for biosolids produced from the treatment of sewage in a wastewater treatment plant.

Comment 1

Highlighted language should read “When a facility mixes septage, sewage, sewage sludge and/or biosolids together.”

1.1.3. – Page 2

Persons Required to Apply for Coverage under this Permit Unless you are obtaining an individual permit in accordance with WAC 173-308-3107, you must apply for coverage under this permit if you own or operate a treatment works treating domestic sewage, including but not limited to:

- **Publicly owned treatment works.**
- Privately owned treatment works that treat only domestic sewage, or treat domestic sewage separately from industrial wastewater

Comment 2

Highlighted text should be replaced with “Publicly or privately owned treatment works”

Type of ownership should not make a difference. See definition of Treatment works in 173-308-080

1.2.3. – Page 5

Active Biosolids Management Section (4) of this permit applies to facilities with active biosolids management programs, but not those than manage only septage (1.2.2 above). You are subject to the active biosolids management section (4) of this permit if:

- You apply biosolids (or septage treated to standards for biosolids generated at a wastewater treatment plant) to sites approved specifically for you.

- You sell or give away biosolids you treat to exceptional quality standards.
- You **treat** and send biosolids to another facility for land application.
- You treat septage to meet Class A or B pathogen reduction.
- You treat a **mixture of septage and biosolids** to meet Class A or B pathogen reduction.
- You are a beneficial use facility (BUF) as defined in WAC 173-308-0808.
- You receive non-exceptional quality biosolids for further treatment, except for compost facilities operating only under a local solid waste permit in accordance with WAC 173- 308-310(1)(a)7
- You operate a surface impoundment and expect to remove solids during the five-year term of the permit. Consult your regional biosolids coordinator for guidance.

Comment 3

Highlighted text should read “produce”

Highlighted text should be read “mixture of septage, sewage, sewage sludge and/or biosolids”

2.4. – Page 14

Requirements for Transporting Sewage Sludge or Biosolids Transportation of biosolids must be consistent with an Ecology-approved spill response plan. All generators are responsible for ensuring the safe and properly documented transportation of biosolids they generate, from the time of generation through the time of final use or disposal. Any facility subject to this permit is responsible for the performance of any contractor or subcontractor they retain for the transportation of biosolids. Transporters must comply with Title 81 RCW and rules adopted thereunder, as applicable. **You may only transport non-exceptional quality biosolids to another facility for further treatment, an approved land application site, an approved storage site, or an approved disposal facility.**

Comment 4

Highlighted language could be interpreted to preclude hauling EQ biosolids to a permitted site.

2.4.2. – Page 15

Accepting Biosolids from Federal, Tribal, or Out of State Facilities

Treatment works must have written approval from Ecology before accepting biosolids from a federal, tribal, or out of state facility. Treatment works subject to this permit, may not accept biosolids for further treatment or disposal unless the generating treatment works complies with the following requirements. Generating facilities must:

Comment 5

Pumpers pump tanks and grease traps on tribal and federal land. How does this section affect them? Requiring treatment works treating domestic sewage to ensure compliance with this section is overly burdensome. The agency issuing the NPDES permit should ensure the facilities produce suitable sewage sludge or biosolids for further treatment or land application or prohibit the facility from using any treatment facility in the state until they have Ecology approval. The facility can then use the approval document to assure any facility receiving the material for further treatment or use that compliance has been met.

4. Permit Section: Active Biosolids Management – Page 32

Active Biosolids Management Facilities covered in this section have active biosolids management programs. If you have an active biosolids management program, you are:

- Producing exceptional quality biosolids to sell or give away.

This includes wastewater treatment plants, composters, and other treatment facilities.

Treating biosolids and directly applying biosolids to the land or have a legal arrangement to have your biosolids applied to the land where you remain directly responsible for all compliance aspects.

Comment 6

Highlighted text should read “*Treating sewage and/or sewage sludge to produce biosolids*”

SECTION 3.23 Identification and Notice to Interested Parties – Page 25

COMMENT 7

Given that most interested parties are often irritated parties it would make more sense for Ecology to maintain the IPL for each facility rather than the facility itself.

Interested parties typically do not trust the facility they are inquiring about, at least that has been our experience. They want to talk to the agency governing the facility and be assured their voice is heard.

In our experience “Interested Parties” do not want our facility to have their private email address, phone number or mailing address. We suggest that information be treated to the same protection as a whistleblower. Ideally, Ecology would maintain those lists confidentially, and each facility would be responsible for submitting requests they receive to Ecology.

COMMENT 8

"If an interested party provides both an email and physical mailing address, the facility must notify using both addresses, or confirm receipt of notification by one."

We suggest that facilities be able to choose which method of communication to use. Or the IP can specify which method they prefer. Either or, not both.

Statewide General Permit for Biosolids Management-Draft" Appendix D Glossary of terms, page 48-

"Treatment Works Treating Domestic Sewage: A publicly owned treatment works or any other sewage sludge or wastewater treatment devices or systems, regardless of ownership, used in the storage, treatment, recycling, and reclamation of **municipal or domestic sewage or sewage sludge**, including land dedicated for the disposal of sewage sludge. Treatment works treating domestic sewage also includes beneficial use facilities and septage management facilities as defined in this section, and a person, site, or facility designated as a treatment works treating domestic sewage in accordance with WAC 173-308-310(1)(b)7. This definition does not include septic tanks or similar devices or temporary, small-scale storage as defined in this section.

Comment 9

Based on this definition we would contend that municipal sewage should be included in the following:

Page 2

1.1.1."Explanation of the Terms "Sewage Sludge", "Biosolids", and "Septage" Sewage sludge is the solid, semisolid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Biosolids are produced by treating sewage sludge to meet standards that allow them to be beneficially used for their nutrient and soil conditioning value."

Specifically changed to- "generated during the treatment of domestic sewage and/or municipal sewage"