

Pierce County Planning and Public Works

1) General Comments

Several items included in this permit are covered under regulations in the Washington Administrative Code. For example, minimum sampling frequency, allowable pollutant limits, and labeling requirements all have requirements under their respective sections in the WAC. We assume this general permit prevails in case there are any differences between the general permit and the WAC.

2) Biosolids Facility List

Column 4 of Table - The Biosolids Facility List has N/A listed under the column "Counties Where Land Applying" for Pierce County's Chambers Creek WWTP. Change N/A to Douglas County. Pierce County has a contract with the Boulder Park BUF to land apply biosolids in Douglas County.

3) Section 1.1.4. Activities Regulated Under this Permit

Fifth Bullet – "Selling or giving away biosolids in bags or other containers with a capacity of one metric ton (1.1 U.S. tons), or less." Assuming this means wet tons since it references a container.

4) Section 1.2 Structure of this General Permit

There are several areas within the permit that describe which sections (Baseline, Active Septage, and/or Active Biosolids) apply to a facility. It may be helpful to have a flowchart similar to the one provided in Section 2.1 to simplify how a facility can determine which sections are applicable.

5) Section 1.1.6 Role of EPA

Include reference to EPA Part 503 Rule since it is a critical piece of biosolids management.

6) Section 2.1 Understanding and Complying with the Permit System Second box under Existing Facilities - Change last sentence to: To confirm which sections of this permit apply to your facility, consult the Facility List provided by Ecology. (Or something similar)

7) Section 2.1 Understanding and Complying with the Permit System

Second box under New Facilities - Add that new facilities must apply for coverage.

8) Section 2.1 Understanding and Complying with the Permit System

Fifth box under Existing Facilities - Define "in a timely manner."

9) 2.3. Maintaining Contact Information

Clarify who updated contact information should be sent to. Assuming the Biosolids Coordinator.

10) Section 2.17. Reporting and Notification

Add reference to EPA Part 503 rule on federal reporting requirements.

11) Section 2.21. Compliance Schedules

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12) Section 4. Permit Section: Active Biosolids Management

Assuming Section 4 also applies to facilities that produce non-EQ biosolids. I guess this is inferred by the second bullet point but not stated directly.

13) Section 4.5. Requirements for Non-Exceptional Quality Biosolids Applied the Land - change "applied TO the land."

14) Section 4.6. Exceptional Quality Biosolids

Define exceptional quality, first generation and second generation biosolids for clarity.



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June 29, 2021
WW-21017

Kyle Dorsey
Statewide Resources Section
Solid Waste Management
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Subject: Comments on the Statewide General Permit for Biosolids Management

Dear Mr. Dorsey:

Pierce County appreciates the opportunity to provide comments on the Statewide General Permit for Biosolids Management. Our comments are attached and have also been submitted online through the Department of Ecology's Public Comment Form.

We found the new permit straightforward and generally only had minor comments. The main comment is that we would appreciate clarification on the definition of second-generation exceptional quality biosolids products.

If you have any questions or concerns regarding Pierce County's comments, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Laurie Pierce".

Laurie Pierce
Operations Manager

LP:KG:srd
Admin/Admin OA/WWTP/Correspondence Logs/2021/WW21017-LP

**Statewide Biosolids General Permit – Pierce County Sewer Division Comments
June 25, 2021**

Comment Number	Permit Section	Current Language	Comments/Suggested Modification	Impacts and/or Results
General Comments				
1	General	Several items included in this permit are covered under regulations in the Washington Administrative Code. For example, minimum sampling frequency, allowable pollutant limits, and labeling requirements all have requirements under their respective sections in the WAC.	Assuming this general permit prevails in case there are any differences between the general permit and the WAC.	Clarity
Biosolids Facility List				
2	Column 4 of Table	The Biosolids Facility List has N/A listed under the column "Counties Where Land Applying" for Pierce County's Chambers Creek WWTP.	Change N/A to Douglas County. Pierce County has a contract with the Boulder Park BUF to land apply biosolids in Douglas County.	Correction
Section 1. Overview and Changes				
3	Section 1.1.4. Activities Regulated Under this Permit	Fifth Bullet – "Selling or giving away biosolids in bags or other containers with a capacity of one metric ton (1.1 U.S. tons), or less."	Assuming this means wet tons since it references a container.	Clarity
4	Section 1.2 Structure of this General Permit	There are several areas within the permit that describe which sections (Baseline, Active Septage, and/or Active Biosolids) apply to a facility.	It may be helpful to have a flowchart similar to the one provided in Section 2.1 to simplify how a facility can determine which sections are applicable.	Clarity
5	Section 1.1.6 Role of EPA	"The United States Environmental Protection Agency (EPA) has a responsibility for implementing a national biosolids management program. EPA and Ecology work cooperatively on program implementation. EPA provides periodic technical assistance to the state. In return, the state provides information on request to EPA regarding biosolids management in Washington."	Include reference to EPA Part 503 Rule since it is a critical piece of biosolids management.	
Section 2. Baseline Requirements Applicable to All Facilities				
6	Section 2.1 Understanding and Complying with the Permit System	Second box under Existing Facilities: "Existing Baseline facilities without active programs are automatically covered on the effective date of the	Change last sentence to: To confirm which sections of this permit apply to your facility, consult the Facility List provided by Ecology. (Or something similar)	Clarity

**Statewide Biosolids General Permit – Pierce County Sewer Division Comments
June 25, 2021**

Comment Number	Permit Section	Current Language	Comments/Suggested Modification	Impacts and/or Results
		general permit. To confirm your, consult the Facility List provided by Ecology.”		
7	Section 2.1 Understanding and Complying with the Permit System	Second box under New Facilities: “New facilities are not subject to automatic coverage.”	Add that new facilities must apply for coverage.	Clarity
8	Section 2.1 Understanding and Complying with the Permit System	Fifth box under Existing Facilities: “Existing facilities without active programs that submitted an NOI in a timely manner do not need to submit a permit application.”	Define “in a timely manner.”	Clarity
9	Section 2.3. Maintaining Contact Information	“All facilities must provide and update as necessary the name, title, physical address, mailing address, and a valid, actively monitored email address for the following contacts.”	Clarify who updated contact information should be sent to. Assuming the Biosolids Coordinator.	Clarity
10	Section 2.17. Reporting and Notification	“Some facilities have a separate obligation to report to U.S. EPA. This permit does not address federal reporting requirements.”	Add reference to EPA Part 503 rule on federal reporting requirements.	Clarity
11	Section 2.21. Compliance Schedules	Error! Bookmark not defined		Typo
Section 4. Permit Section: Active Biosolids Management				
12	Section 4. Permit Section: Active Biosolids Management	Facilities covered in this section have active biosolids management programs. If you have an active biosolids management program, you are: <ul style="list-style-type: none"> • 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. • Sending your biosolids to a BUF that applies them to the land under a separate permit (this does not relieve you of responsibility for proper management of your biosolids). • Applying biosolids to the land as a permitted BUF. 	Assuming Section 4 also applies to facilities that produce non-EQ biosolids. I guess this is inferred by the second bullet point but not stated directly.	Clarity
13	Section 4.5. Requirements for Non-Exceptional Quality Biosolids Applied the Land		Requirements for Non-Exceptional Quality Biosolids Applied to the Land	Typo

**Statewide Biosolids General Permit – Pierce County Sewer Division Comments
June 25, 2021**

Comment Number	Permit Section	Current Language	Comments/Suggested Modification	Impacts and/or Results
14	Section 4.6. Exceptional Quality Biosolids		Define exceptional quality, first generation and second generation biosolids for clarity.	Clarity