



July 12, 2021

Department of Ecology
Kyle Dorsey, State Biosolids Program Coordinator
Solid Waste Program
PO Box 47600
Olympia WA 98504-7600

Subject: Comments for Statewide General Permit for Biosolids Management
Comment Letter Uploaded via Ecology Web Portal

Dear Mr. Dorsey:

The City of Vancouver appreciates the opportunity to provide comments regarding the draft Statewide General Permit for Biosolids Management. Furthermore, the City commends Ecology's Biosolids Management staff for incorporating updates and changes to the previous permit into this draft permit, which result in pragmatic and workable program elements for facilities and entities who manage sewage sludge and biosolids.

The City of Vancouver operates a sewage sludge incinerator and the Vancouver Westside WWTF is named in Section 2.6.1 *Incineration* and thereby authorized to continue incinerating biosolids generated at the facility, and to accept biosolids for incineration from other facilities who meet certain requirements in Section 2.6.3 of the permit.

Comment: Vancouver's incinerator as well as other sewage sludge incinerators in Washington incinerate sewage sludge generated from their facilities. The term "sewage sludge" (as opposed to "biosolids") is consistent with the definitions in Chapter 173-308, descriptions in 40 CFR Part 503, and in 40 CFR Part 62, Subpart LLL. **The City recommends making the reference to "sewage sludge or biosolids" in Section 2.6.1.**

During the past 5 years the City of Vancouver has received sewage sludge or biosolids from other wastewater treatment facilities on a temporary basis, with review and written authorization from Ecology's regional biosolids coordinator. This activity reflected the requirements in Section 2.6.3 of the permit and appears to work well for the involved parties. These procedures were delineated in a Notice of Final Coverage Under the General Permit for Permit No. BA0024350, issued by Ecology in a letter to the City dated July 17, 2018.

The City also recognizes and appreciates the requirements listed in Section 2.4.2 *Accepting Biosolids from Federal, Tribal, or Out of State Facilities*. While the City doesn't seek or particularly prefer to receive sewage sludge or biosolids from other treatment works, we recognize emergency or temporary

needs to receive authorization for disposal at Vancouver's incineration system if such materials are compatible.

Again, we appreciate the diligent and pragmatic effort to help make treatment works' biosolids programs successful across the state of Washington.

Respectfully submitted,

Frank Dick, PE

Wastewater Engineering Supervisor
City of Vancouver WA – Public Works

Please contact Frank Dick frank.dick@cityofvancouver.us (503) 539-8940 for any questions.

Sincerely,



Frank Dick, PE
Wastewater Engineering Supervisor

cc. Jennifer Belknap Williamson / City of Vancouver – Public Works Director
John Loucks-Powell / Jacobs – Plant Manager