

FIRE MOUNTAIN FARMS

Please See Attached



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Comments on Draft General Permit for Biosolids Management

1. Interested Parties List

- a. Most people on the list are not fans of facility to maintain a degree of improbity DOE should maintain and notify,
- b. Some Interested Parties may not want to give facility personal information.
- c. If notice is returned cannot deliver or if sent certified and was not signed for the person should be removed from list

2. Public Notices

- a. should be standardized with in the state and for each type of activity IE (treatment works vs Land application)
- b. Just because a site doesn't have a following when someone starts to raise Issue, they will always go to I wasn't notified, a standard procedure will reduce this. We say we do X and everybody does X.

3. Public Hearings

- a. DOE should develop Criteria for when a hearing will be held
 - i. Do they have an Issue or unaddressed issue?
 - ii. Is there a misunderstanding of project and scope?
 1. Meeting Or Hearing needed
 - iii. If they Just don't like a project there is not a need

4. Comments Periods

- a. Should be limited to 45 Days, DOE can still receive and review but they do not need to be considered in response, even after Permit is issued DOE can and has added Conditions
 - i. Even as I submit these late, it is used to stall a project without any gain
- b. Response to comments Needs to be Prompt DO NOT wait tell the end of the comment period to start working on response the delay in response leads people to believe that you were not listening
 - i. 30-day ideal
 - ii. 60 days ok
 - iii. Over 90 days Not ok

Fire Mountain Farms: 349 SR 508 Chehalis, WA 98532

Fire Mountain Farms: 856 Burnt Ridge Road Onalaska, WA 98570



5. Tables S2& B4 Site restriction signs
 - a. If the generator is not doing the land application under their permit should not be listed on the sign
 - b. It could create confusion as the generator may not be familiar with application area or Operation that is going on
 - c. It could also lead to Generator being harassed because someone doesn't like Biosolids application.
 - d. I could also lead to Questions, Comments, Complaints going to someone at a city and never making it back to the permitted beneficial use facility (BUF)
 - e. Sign should have
 - i. Site restriction
 - ii. Permitted BUF & contact information
 - iii. Responsible DOE region office
6. DOE should recognize that biosolids is a standard Ag Practice and is covered under State and Local Right to Farm ordinances.
 - a. <https://www.nebiosolids.org/pa-supreme-court-finds-biosolids-recycling-normal-agricultural-operation/>
7. Maps
 - a. The size requirement to 8.5*11 I believe that 11*17 or A4 should be allowed as it is fairly standard paper size and it keeps more area on one page for a better view of the site without having a lot of pages trying look and find a certain feature and understanding where thing lay in relation to an application Zone
8. Buffers
 - a. Buffers should be based on science not fear mongering.
 - b. Property Boundary Buffers Should be no more that surface water.
9. Seasonal timing
 - a. Should be condition based without abstract dates, As the weather In Washington can be moody from wet springs and dry falls to dry springs and wet falls
10. Issue with Post harvest nitrate fall Sampling
 - a. If you apply x and get less than 15ppm N post-harvest then you can apply 60# more N
Why can't we do a single application of X+60 and not do a fall 60# application
11. We appreciate the that DOE is trying to stream line the process so that they can focus more attention to Facility's that are producing & land applying

Best Regards,
Ryan Thode
Fire Mountain Farms