

Wa Dept of Ecology - SWM Program, SWRO

The current SGP, at Section 9.3, requires that "[a]ll new land application sites, where nonexceptional quality biosolids will be applied, must be tested for the pollutants listed in WAC 173-308-160 Table 3 to determine background levels." However, the current SGP does not identify a meaning of "background" as a regulatory term in this context, nor does it describe how the background levels established through this testing requirement are to be used in decision-making about land applications of biosolids. It appears that the 308 rule is also silent on these points.

The Draft SGP includes similar language in Section 4.5.3, requiring that permittees "must test all new land application sites for the pollutants in Table 1 of WAC 173-308-160, including nitrate and other nutrients if specified." There is no mention of determining background levels as a rationale for this required testing. Is the draft SGP's omission of the clause "to determine background levels" intentional?