

Technical Memorandum Name: Solid Handling, April 2008
Commenter: Gail McPherson
Comments Date: June 9, 2008
Responses Date: July 18, 2008

The following comments were submitted in response to the above listed Technical Memorandum (TM). The TM was developed as part of the EIR process for the project, in order to help facilitate and broaden the discussion of project issues important to the community. The responses should be considered preliminary because the EIR process is not complete, and the information necessary to fully respond has not yet been developed. The project team is grateful to those citizens who took the time to review the TM and provide comments at this early stage in the process. The project team will endeavor to fully address the comments and concerns through the on-going project development process.

	Comment	Response
1	<p>RE: Response to Technical Memoranda- Septic Receiving Stations, Biosolids handling, and general comments on Broderson (nitrogen management) and related disposal issues awaiting responses:</p> <p>The Citizens for Clean Water respectfully submits the following comments orally and in writing to the County Wastewater Project consultants, including EIR consultant Michael Brandon Associates.</p> <p>Abbreviated oral comments were provided at the June 9, 2008 Technical Advisory Committee based on time allowances.</p>	
2	<p>TM Biosolids Handling: The TM for treatment of solids from various processes was estimated based on the full strength influent at 4,000 lbs dry solids/day for a gravity collection system and 1,000 lbs dry solids/day for a septic tank effluent pumping/gravity (STEP/STEG) system. Is the capacity for the plant sized based upon septic receiving alternatives? The septic receiving alternatives combined with the different liquids treatment processes that produced "multiple solids estimates, ranging from 570 to 5,400 dry lbs/day of solids to be treated." This is a huge range. As noted above and in the TM, if the County wishes to develop regional facilities, all components would be developed and considered, and the costs shared regionally. That seems outside this process.</p>	<p>See Section 1.0 of the tech memo. This tech memo did not assume the acceptance of regional septage for the analysis of biosolids handling options. The analysis is based on 4,000 and 1,000 lbs of dry solids per day based on treatment from gravity and STEP collection systems, respectively.</p> <p>The Septage Receiving Station Option tech memo estimates impacts on the treatment plant due to different septage receiving assumptions.</p>
3	<p>The TM planning for the project and future options should be considered based on the risks and liabilities for onsite handling versus offsite handling and disposal. The Federal 40 CFR 503 regulations are enforceable standards and</p>	<p>Section 2 of the tech memo addresses regulatory issues specifically related to Federal 40 CFR 503 regulations.</p>

	<p>requirements specifically detailed in the waste discharge requirements. The process requires basic solids separation, digestion, and removal. As system complexity is added, the capital and operating costs increase. Staffing, and energy and costs for treatment, monitoring/testing, reporting, and contingency plans for disposal as well as emergency plans is ever increasing.</p>	
4	<p>The siting and neighborhood concerns increase with onsite options such as composting and dedicated land application, following the basic treatment processes. However, truck traffic for frequent removal has to be balanced with the onsite concern for solar drying or composting. Master planning for the full project with multiple options for disposal is required. The future of anyone solution for Biosolids disposal is not secure. Again, any added element that is not specifically required within the treatment train should be reviewed as an option after the selection basic project technology, and included to produce value added, if applicable.</p>	<p>Comment noted. This tech memo evaluates several biosolids handling options for the purpose of quantifying costs, regulatory issues, land use requirements, facility footprint, visual impacts, odor impacts, truck traffic, and disposal/end user options.</p>