

DNR UPDATE

2017 SPRING BIOSOLIDS SYMPOSIUM

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Wisconsin DNR
Rev. Mar 20, 2017
DEPT. OF NATURAL RESOURCES

OVERVIEW

- Electronic Reporting
 - EPA
 - DNR
- Reporting
 - Annual Reporting
 - Septage: County Reporting
- DNR/DOJ Meeting
- Septage Program Staffing
- New DATCP Rules
- ATCP 50 vs NRCS 590
- NRCS 313
- EPA Region 7
 - Biosolids Excellence
 - Enforcement
- EPA:
 - EQ+ Biosolids
 - Struvite
- Enforcement Related

EPA ELECTRONIC REPORTING RULE

Background

- Biosolids Reporting:
 - Non-Delegated States directly to EPA (Region 7)
- Many notifications that the system is “down”
- Frustrations
 - States
 - Facilities
- Error in Mailings to Wisconsin

Electronic Reporting Requirements

- Impacted Wisconsin (GPs)

ELECTRONIC SIGNATURE

- EPA will require changes to Wisconsin's system
 - “Much more difficult”
 - “Frustrating Process”

Signature



PLANNED IMPROVEMENTS

2017 CALENDAR YEAR REPORTING—

- Portable Restroom Wastes (New Reporting Code (#TBD))
- One Electronic Submittal/Certification
 - Both Forms 52/55 Submitted together
- Automatic Loading for:
 - Characteristics & Monitoring Reports (3400-49)
 - Septage Annual Reports (3400-52 & 3400-55)
 - WPDES Annual Reports if 3400-49's are loaded

ANNUAL ELECTRONIC REPORTING

- Annual reports were due Jan 31
- HELP?
 - Inna Gurevic 608-261-6406
- Future: OpCert/Bus Lic—Electronic Renewals

**→ NO 2017 SEPTAGE BUSINESS RENEWALS
W/OUT REPORTS**

COUNTY REPORTING (septage)

Authorized by:

- S. 145.20 Wis. Stats.,
- S. 383.55 Wis. Adm. Code

→ Answer all questions per county

- Electronic/Paper

→ 30 Day

→ **ALL** Servicing Events (inspection/maintenance)

Submit all required forms.

→ Use CERTIFICATION NO. of PERSON

DEPT. OF JUSTICE (DOJ) MEETING

- **Meeting Goals**
 - Align Staff/Team
 - Understand Cross-Dept. Issues
 - Evaluate Recent Referrals
 - What can we learn
 - What can we improve
- **General “Take Homes”**
 - Better translation from Experts
 - News Releases
 - Pre-Referral Meetings
 - Revocation Timing
 - Joint Efforts DOJ/DNR

DEPT. OF JUSTICE (DOJ) MEETING

- **Program “Take Homes”**
 - Pathogen Control
 - Cropping Restrictions
 - VAR
 - Injection/Incorporation
 - pH Treatment
 - Certification
- **Process Changes**
 - Consider Revocation earlier
 - Pre-referral Meetings
 - Strategic Enforcement Matrix

DEPT. OF JUSTICE (DOJ) MEETING

MESSAGING

- DOJ/DNR Joint messaging
- Report Issuance in place of News Releases
- Compliance Assistance
- Outreach
- Identifying KEY POINTS

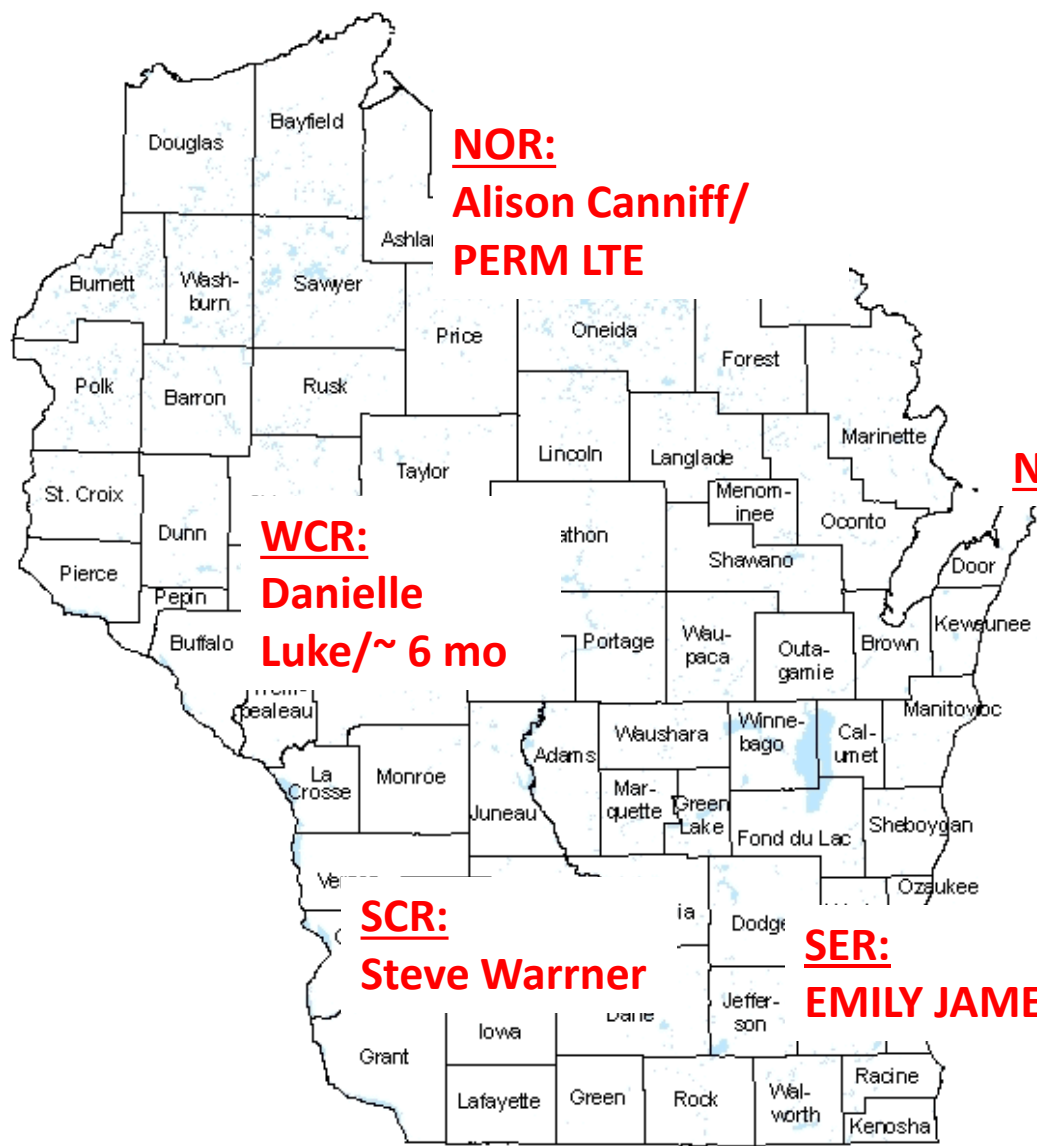
BALANCE

- Compliance
- Education
- Enforcement

TEAMWORK

- Balance
- Incremental Improvements
- Protecting Public Health & Safety
- Level the “Playing Field”

CURRENT PROGRAM STAFFING

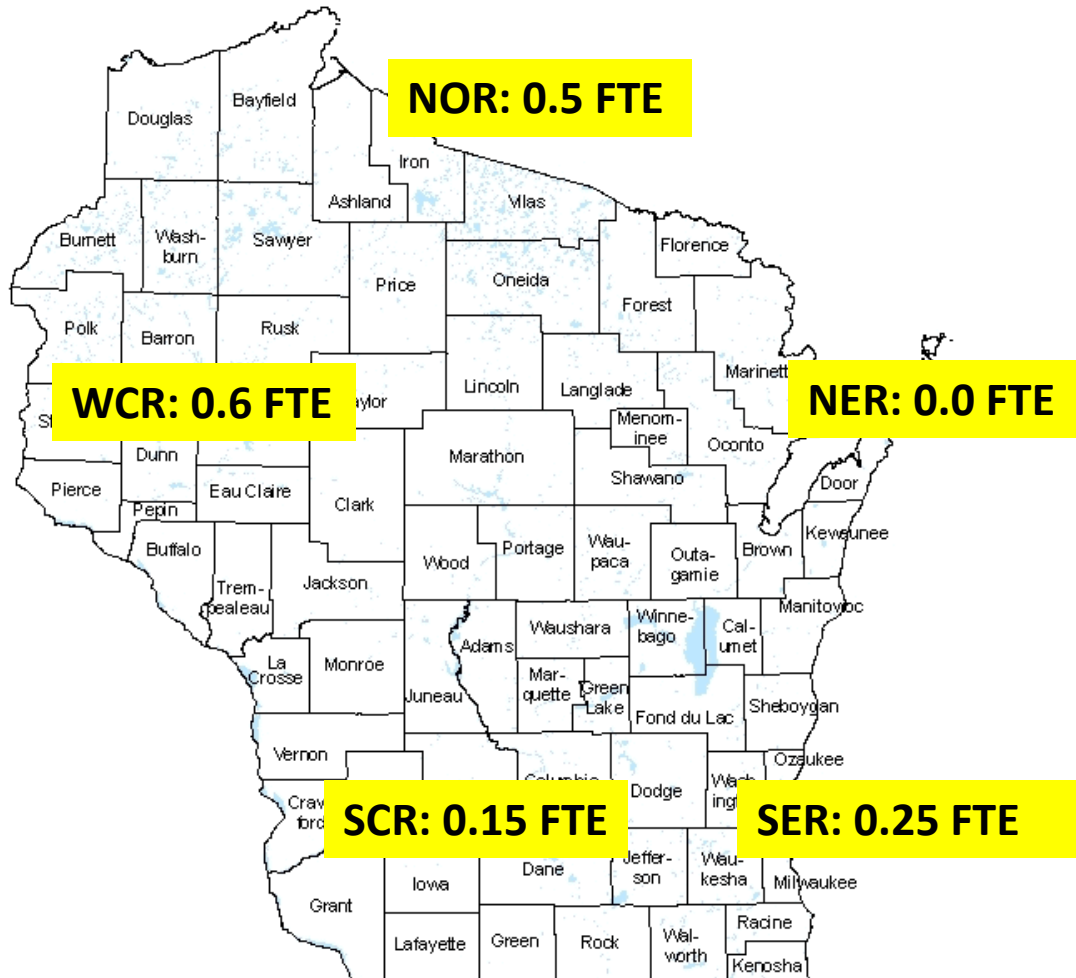


NER: VACANT*

**Op Cert Septage:
Mallory Palmer
Rachel Angel**

**Prog-Statewide:
Fred Hegeman**

ALLOTTED PROGRAM STAFFING



Op Cert Septage
 0.5 FTE Cert. Coord
 0.5 Cert. TEMP

Prog-Statewide
 0.1 FTE

Total: 2.1 FTE

NEW DATCP RULES

DATCP-Dept. of Agriculture, Trade & Consumer Protection

- ATCP 65.22 (6)(c)
- Effective August 2016

(6) TOILETS. (a) Every dairy farm shall have one or more sanitary toilets that are conveniently accessible by persons engaged in milking operations. A conveniently accessible toilet may include a toilet in a farm residence or other farm building.

(b) Toilets, under par. (a), shall comply with ch. SPS 362. Toilets shall be kept in clean and sanitary condition.

(c) There shall be no mixing or storage of human waste or septage with animal manure on a dairy farm.

ATCP 50 vs NRCS 590

ATCP 50

- Adm. Code
 - Approval by Legislative
- References NRCS 590, 2015
- Exemptions for Septage, Biosolids, Ind. Waste WHEN PRIMARY NUTRIENT
- If NOT primary nutrient...then farmer, not septage applier
- Will lead to changes in NR 151

NRCS 590 (2015)

- Standard
- All Organic Waste
- Limited to 7,000 gal during Feb/Mar
- Bedrock Concerns

NRCS 313

(Manure) Waste Storage Facility

- NRCS 313, May 2016
- *“This practice does not apply to the storage of human waste or animal carcasses.”*
- Construction Standard...not a code or a law.
- Legal Determination forthcoming.

EPA

- **Region 7: Kansas City**
 - Iowa, Kansas, Nebraska & Missouri
- **Biosolids Center of Excellence**
 - Staffing experts
- **Biosolids Enforcement**
 - Complaints in Region 5 go to Region 7
 - CWA Section 308 Letters

EPA

Struvite Issues

- Magnesium ammonium phosphate
- UNCONTROLLED:
Problems w/
pipes/pumps clogging
- CONTROLLED
 - Ostara & Other process
- Derived from sewage sludge...not regulated as sewage sludge...EPA new opinion...

Fig. 1 illustrates occasions where struvite was formed in the piping at treatment plants.



Fig. 1. Clogging of a post digestion pipe by struvite at a treatment plant (location confidential)



Photo Credit: John Colletti, USEPA

EPA

Biosolids: EQ → EQ+

- Considering upgrading for GREAT EQ biosolids
- KEY: Stability
 - Permanently
 - Irreversibly stabilized
 - ≥38% Vol Solids Reduction**
- Dependent upon regulatory timing

**Not usually a good measure

EPA

WISCONSIN Presence

- Presence has been lacking (2009)
- Recent Biosolids Facility Audit
- Other Activities Approaching
 - Review Recent Class A Submittals
 - Participate in Enforcement Cases

Thank you!