



State of Utah

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DIVISION OF WATER QUALITY
Walter L. Baker, P.E.
Director

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June 29, 2011

The Honorable Michael Hall
Mayor of Richmond City
P.O. Box 9
Richmond, UT 84333

Document Date 12/18/2013



DWQ-2011-009721

Dear Mayor Hall:

Subject: Approval to Waste Biosolids to the Richmond Sewage Lagoon Primary Cell

We apologize for the amount of time it has taken us to respond to your letter dated April 25, 2011. Proposals similar to those in your letter, to waste and treat biosolids to the primary cell of the Richmond City sewage lagoons, have not been previously approved here in the State of Utah. Considerable discussion and debate were needed to allow us to make a decision regarding the feasibility of the proposal.

The Division of Water Quality (DWQ) has decided that Richmond City can waste biosolids from its membrane bioreactor sewage plant to the primary sewage lagoon cell on an experimental basis, providing the following best management practices and requirements are followed.

- Richmond City must evaluate the lagoon liner in accordance with the liner criteria tables of the Natural Resource Conservation Service (NRCS) Standard Practice 313 and determine if the liner design is adequate to protect underlying ground water for this application. The evaluation must be submitted to the DWQ for review and approval within 120 days of the date of this letter. The liner must be approved for this application if this disposal method is to be approved to continue beyond 180 days of the date of this letter.
- This biosolids disposal method must be terminated immediately, and the biosolids inventory removed from the lagoon and disposed of properly, if the practice is found to cause a threat to ground water, human health, or create an unacceptable nuisance or odor situation or otherwise cause an adverse impact on the environment. The biosolids must be moved as soon as possible, but no longer than 120 days after an unacceptable situation is declared and the current management scheme is determined to be unacceptable. The DWQ and/or the Bear River Health Department will decide the acceptability of any possible unsuitable situations, and Richmond City may be required to dispose of biosolids by one of the two alternate methods identified in the Biosolids Management Plan if an unacceptable situation is created by the proposal.
- A Biosolids Management Plan must be submitted by Richmond City within 120 days upon

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receipt of this letter. The plan must be approved by the DWQ prior to the issuance of the Biosolids permit.

- Biosolids will only be wasted to the primary cell of the Richmond City wastewater lagoon system. No other cells of the lagoon will be used for biosolids disposal.
- The Biosolids Management Plan shall be appended to the Richmond City Biosolids Permit and considered as a part of that permit. If the Biosolids Management Plan and permit are not followed, as agreed upon by Richmond City and the DWQ, please be aware that Richmond City could be subject to an enforcement action.
- The Biosolids Management Plan shall fully detail at least two alternate methods of proper biosolids disposal in accordance with 40 CFR 503.
- Within the lagoon disposal cell, the sludge blanket will not accumulate to more than 2 feet deep, with no more than 2 feet of water above the sludge blanket, for a total of no more than 4 feet of sludge and water depth. When the sludge blanket reaches a 2 foot depth, further disposal into the cell will be terminated immediately and the biosolids will be removed from the lagoon and disposed of in an acceptable manner within 120 days of reaching the two foot biosolids' depth.
- The Biosolids Management Plan shall describe how the sludge will be removed from the primary cell of the lagoon system. Removal shall be achieved without causing any damage to the original cell liner.

If Richmond City agrees to submit a Biosolids Management Plan, with all of the conditions above, including those in the Biosolids Management Plan, the DWQ will continue to allow Richmond City to waste biosolids to the primary cell of the Richmond City sewage lagoon system as an experimental program.

We wish you success in your attempt to waste and treat biosolids to your primary cell from your membrane bioreactor sewage plant. If you should have comments, suggestions, or questions, please call Mark Schmitz at (801) 536-4384, or email Mark at mschmitz@utah.gov

Sincerely,



Walt Baker, P.E.
Director

MS:me

cc: Bear River Health Department
Bob Brobst, EPA Region 8
Stephanie Gieck, EPA Region 8
Brad Rasmussen, Aqua, Engineering