Re: I put together my own checklist can you review

Osypian, Mackenzie L (DEC) < Mackenzie. Osypian@dec.ny.gov>

Thu 4/2/2020 2:17 PM

To: Mary Rayeski <maryrayeski@gmail.com>

Mary,

I have reviewed the document and added a few items that are required per 6 NYCRR Part 360 series. The added text is italicized and key words are in bold. The document will be a good starting point when adding sources to the land application permit.

Regarding the permit modification application Leo Dickson and Sons, Inc. submitted on February 2, 2020 please also refer to the comments in the NOIA sent by Kimberly Merchant on Tuesday February 18, 2020. I believe most of the comments overlap with items in the attached document.

Due to the COVID-19 Health Crisis, I will be working from home until further notice. Please e-mail if you need to reach me right away. I will be checking voicemail daily.

Please let me know if you have any questions,

## Mackenzie Osypian

Assistant Engineer, Division of Material Management

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From: Mary Rayeski <maryrayeski@gmail.com>

Sent: Wednesday, April 1, 2020 2:33 PM

To: Osypian, Mackenzie L (DEC) < Mackenzie. Osypian@dec.ny.gov>

Subject: I put together my own checklist can you review

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Mackenzie,

Can you review and let me know if I should add anything to this?

Mary

The following is a checklist to add a Biosolids source to Land Application Permit.

- Complete a New Application for a Solid Waste Management Facility Permit needs to have an engineer listed along with engineer's license number. This application needs to be signed and the original signature copy must be sent to the DEC along with below list.
- Supporting document to Include: Name, Address of Biosolids Generator (WWTP), Phone
  Number. Description of the WWTP Processes. Description of where and how sludge is stored
  prior to pick up. Include sampling location and protocol used to obtain representative sample.
  A description of how the biosolids will be handled once they arrive on site at DES, description of
  how DES facility will comply with all applicable parts of 6 NYCRR Part 360 Series.
- DES can only accept stabilized sludge per the land application permit, if the sludge is deemed not stabilized DES must describe process of achieving stabilization prior to land application.
- Include detailed description of the methods used for pathogen reduction and vector attraction reduction. Pathogen reduction must meet one of the following processes in 361-2.5(d)(2)(i).
   Vector attraction reduction must satisfy one of the requirements in 361-2.5(d)(2)(ii). Include monitoring and data gathering procedures that will be undertaken to demonstrate compliance including type, location, and frequency sampling.
- Report estimated tons per year of biosolids in dry ton. This includes how much the generator generates and how much the facility will accept on an annual dry basis.
- Provide a date range of biosolids samples for the submitted analytical results. A minimum of six months of biosolid production must be represented by the analytical results
- Include analytical results for all parameters in 361-3.9 Table 1 for each of the facilities, except for pH and total solids, the results must be reported on a dry weight basis. Include sampling location and protocol used to obtain representative samples.
- Completed Environmental Assessment Form (Short Form)
- Copy of existing permit must be sent in with all above documents.
- ✓ New Application for a Solid Waste Management Facility Permit
- ✓ Analytical Data per requirements listed above
- ✓ Supporting document detailing all bullet points listed above
- ✓ Completed Environmental Assessment Form (Short Form)
- ✓ Copy of existing permit.
- ✓ The entire packet in original form must be sent to Permits (Robert Call) Region 8 DEC

Table 1		
	Parameters for Analysis	
Total Kjeldahl Nitrogen	Arsenic (As)	Products must also analyze for:
Ammonia	Cadmium (Cd)	Fecal coliform or Salmonella sp. bacteria
Nitrate	Chromium (total) (Cr)	
Total Phosphorous	Copper (Cu)	
Total Potassium	Lead (Pb)	
pН	Mercury (Hg)	
Total Solids	Molybdenum (Mo)	
Total Volatile Solids	Nickel (Ni)	
	Selenium (Se)	
	Zinc (Zn)	

- All laboratory test or analyses must be performed by a laboratory certified to perform those tests
  or analyses pursuant to the New York State Department of Health Environmental Laboratory
  Approval Program (ELAP) or Clinical Laboratory Evaluation Program (CLEP) per 6 NYCRR Part
  360.6(b).
- Completed Environmental Assessment Form (Short Form)
- Copy of existing permit must be sent in with all above documents.
- ✓ New Application for a Solid Waste Management Facility Permit
- ✓ Analytical Data per requirements listed above
- ✓ Supporting document detailing all bullet points listed above
- ✓ Completed Environmental Assessment Form (Short Form)
- ✓ Copy of existing permit.
- ✓ The entire **hard copy** packet in original form must be sent to Permits (**Kimberly Merchant**)
  Region 8 DEC along with an **electronic copy** of the entire packet (most often submitted on CD).