

Anastasia Sharp

From: Anastasia Sharp
Sent: Friday, July 14, 2017 10:41 AM
To: 'rwrmts@yahoo.com'
Cc: John Newberry; Eddy Bouzeid
Subject: Chickasaw Trails Biosolids NOI
Attachments: Copy of AGRONOMIC-CALCS-REV140508.xls

Mr. Richmond,

We have reviewed Chickasaw Trails WWTP Notice of Intent for the land application of non-exceptional quality biosolids. The application appears to be meeting all necessary requirements for pathogens, PCB, TCLP, pollutants, and relevant site information. However your chosen vector attraction reduction method could cause some concern. You are not required to have the testing done in advance, but it is recommended. If you do not meet vector attraction reduction requirements prior to land application, you run the risk of a permit violation.

The process behind Option 1 (volatile solids reduction) involves testing at the input of the digester and the output. You will use a mass balance around the digester to show percent volatile solids reduction which needs to be at least 38% to meet the rule. Option 4 (SOUR test) requires the biosolids percent solids to be below 2%. Your lab results are showing a percent solids value of 3.5% therefore SOUR cannot be used.

We often advise smaller sized plants to employ VAR Option 10 which it seems you are also considering. However, incorporation needs to occur within 6 hours of biosolids application. Would you know your VSR test results within that time frame?

Additionally, do you have any supporting documentation for your agronomic rate calculation? We have attached our spreadsheet for calculating agronomic rate if you need it.

Feel free to call if you have any questions.

Thanks,



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