

3

Skates, Barbara

From: Kathy Smith [katsmith@skycasters.net]
Sent: Tuesday, March 15, 2011 8:23 AM
To: McGucken, Vicki; Skates, Barbara; Kleinmann, Keith; DanStroup@mysebring.com
Cc: Little, Craig; Minsky, Cheryl
Subject: RE: RAS not submitted for package plants that use the City of Sebring WWTF
Attachments: brunners mhp 2010.pdf; villages of highlands ridge 2010.pdf; western blvd 2010.pdf

Attached are the history reports sent to our customers that provide the details of where AMS hauled the residuals that **were not** land applied for each particular facility. Unfortunately, our system does not allow us to create the part four of the Residuals Annual Summary for the City of Sebring's report since the Sebring WWTF is not a Residuals Management Facility. If I can be of further assistance, please feel free to contact me at your convenience.

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RAS

City of Sebring FLA014351
Brunners FLA014369
Villages of Highlands Ridge
2010 FLA014391

From: McGucken, Vicki [mailto:Vicki.McGucken@dep.state.fl.us]
Sent: Monday, March 14, 2011 5:14 PM
To: Skates, Barbara; Kleinmann, Keith; DanStroup@mysebring.com; 'Kathy Smith'
Cc: Little, Craig; Minsky, Cheryl
Subject: RAS not submitted for package plants that use the City of Sebring WWTF

Dear Dan,

Today when I was standing with Bill Hauser, the manager for AMS, at the Nordgren RMF, you called and Bill passed the phone to me.

I understand that Keith Kleinmann sent letters to some of the small WWTFs that AMS hauls to the Sebring WWTF that you manage. You said the letter indicated that Residual Annual Summary (RAS) reports were overdue from the package plants, even though those facilities did not treat/stabilize biosolids at those WWTFs, nor land apply biosolids.

You said AMS hauled the unstabilized biosolids from those package plants to Sebring where the material was accepted at the head of the Sebring facility, treated in the facility, and stabilized as part of the Sebring WWTF. After the Sebring WWTF biosolids are treated to class B, it is land applied; Sebring submitted a RAS.

It is my understanding that only WWTFs that treat biosolids and land apply them are required to submit a RAS, and as you have described it, those facilities neither treated nor land applied and, therefore, are not required to submit a RAS.

I asked SWD facilities that did not land apply but are permitted to treat biosolids at the facility (and have land application sites listed in the facility permits) to submit an "in lieu of" letter. The letter states that they do not owe me a RAS because the facility did not treat and land apply that year, instead they either used an RMF or a land fill.

RMFs have a last page to the RAS that lists all the WWTFs that were stabilized at the RMF and I think that Sebring WWTF should include a similar list of the facilities treated at Sebring, even though your facility is not an RMF.

You asked me for a citation that the facilities do not have to submit an RMF; the rule is that IF you DID land apply, then a RAS is required.

"The permittee shall submit an annual summary of biosolids application activity to the Southwest District Office on Department Form 62-640.210(2)(b) for all biosolids applied during the period of January 1 through December 31. The summary for each year shall be submitted by February 19 of the following year. If more than one facility applies biosolids to the same application zones, the summary must include a subtotal of each facility's contribution of biosolids to the application zones. [62-640.650(3)(b), 3-30-98]"