

Permitting Issues for Biosolids Composting and Processing Facilities

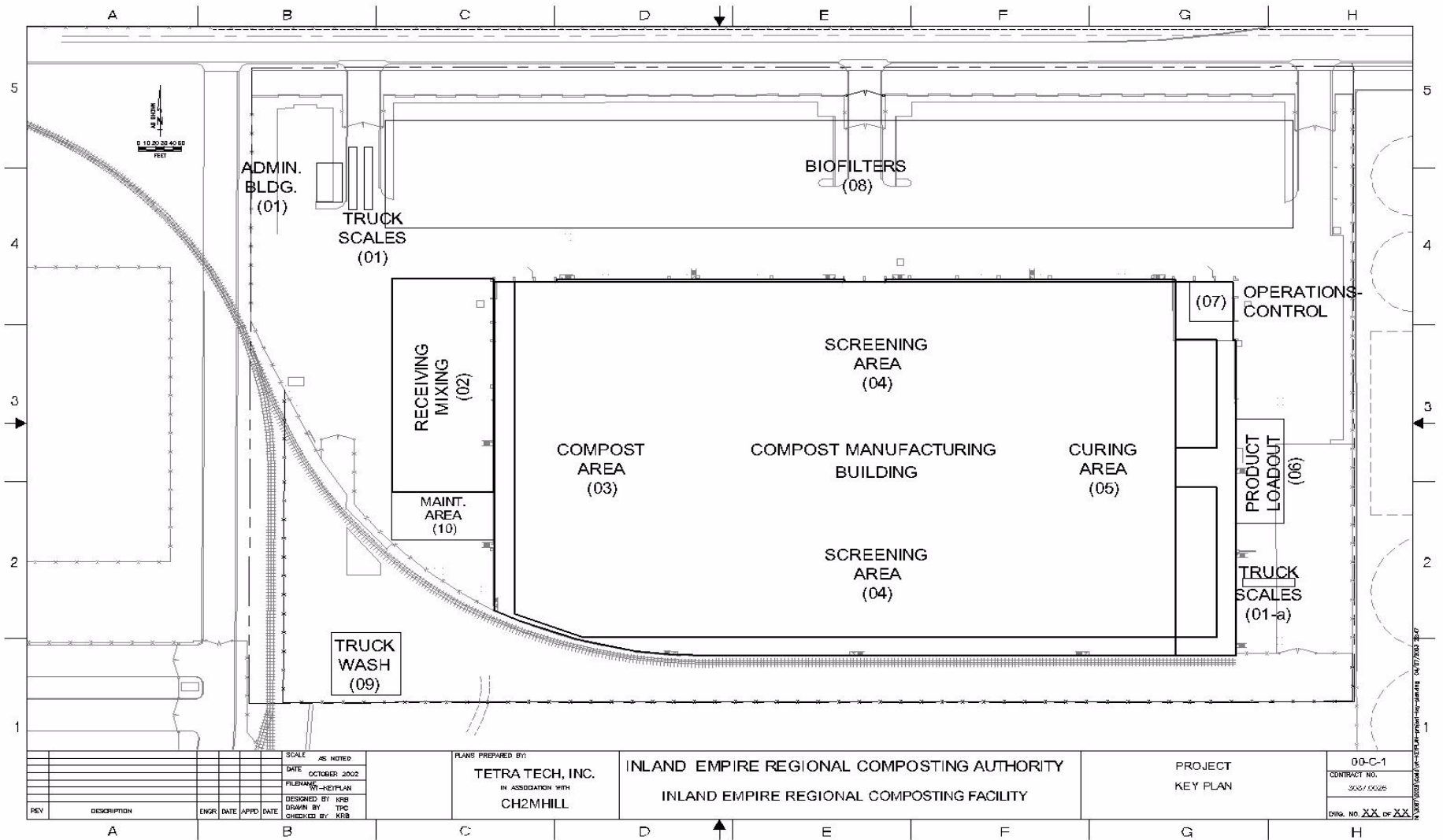
SCAP – Biosolids Emerging Technology Workshop

September 28, 2004

John Robinson, Tetra Tech, Inc.

Pre-Permit Items

- ◆ California Environmental Quality Act
 - ◆ Project Description
 - ◆ Initial Study
 - ◆ Mitigated Negative Declaration **or**
 - ◆ Environmental Impact Report
- ◆ Environmental Impact Report
- ◆ Source Reduction and Recycled Element



REV	DESCRIPTION	ENGR	DATE	APPR	DATE

SCALE AS NOTED
 DATE OCTOBER 2002
 FILENAME 01-KEYPLAN
 DESIGNED BY KRB
 DRAWN BY TPC
 CHECKED BY KRB

PLANS PREPARED BY:
TETRA TECH, INC.
 IN ASSOCIATION WITH
CH2MHILL

INLAND EMPIRE REGIONAL COMPOSTING AUTHORITY
INLAND EMPIRE REGIONAL COMPOSTING FACILITY

PROJECT
KEY PLAN

00-C-1
 CONTRACT NO.
 2002 10026
 DATE NO. XX OF XX

Potential Permits

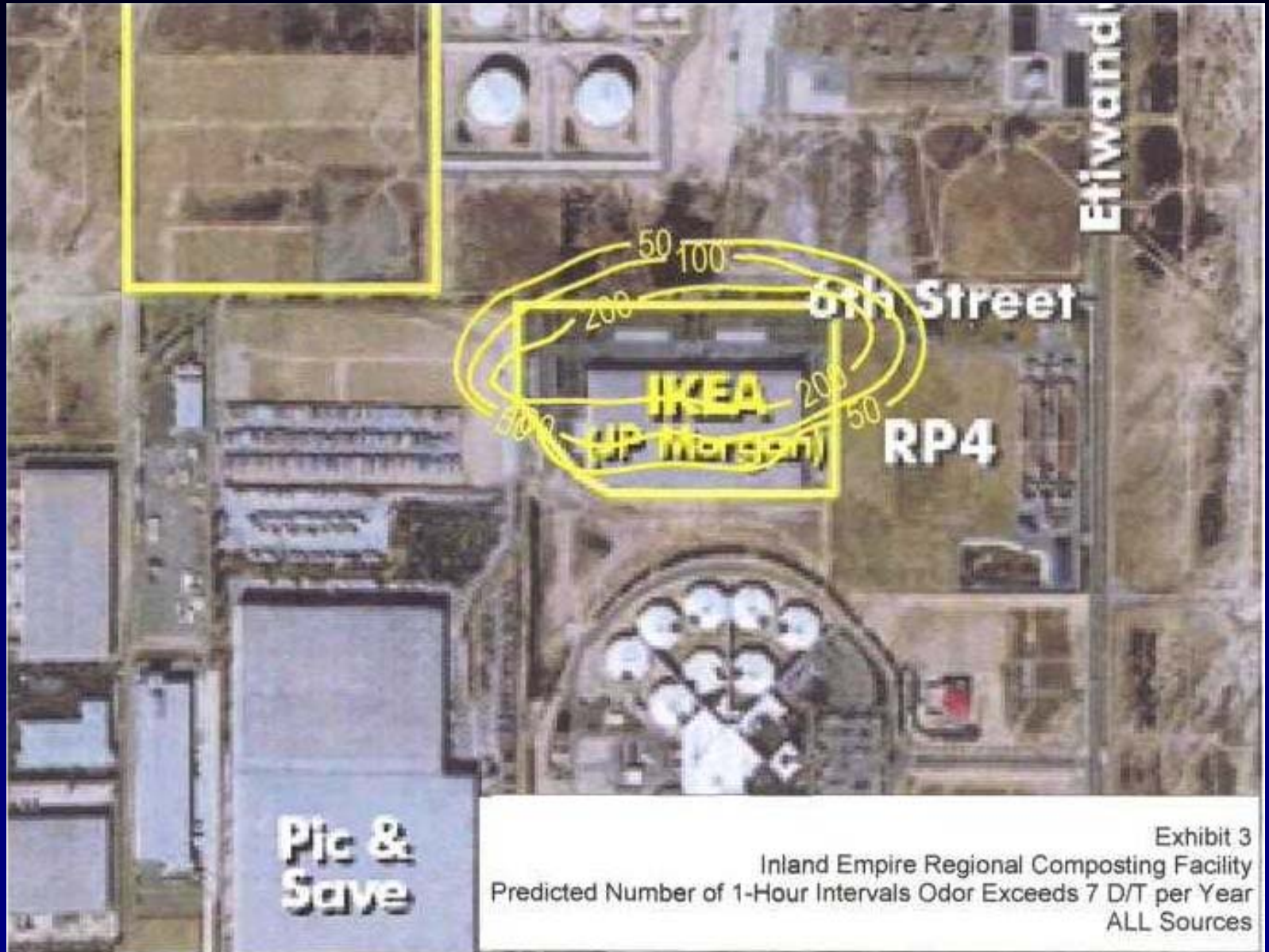
- ◆ Conditional Use Permit
- ◆ South Coast Air Quality Management District
- ◆ California Integrated Waste Mgmt. Board
- ◆ Regional Water Quality Control Board
- ◆ City Permits
- ◆ State Department of Health Services

South Coast Air Quality Mgmt. District

Rule 1133 and Friends

- ◆ Rule 1133.2 – Emission Reduction from Co-composting Operations
- ◆ Regulation XIII - New Source Review
- ◆ Rule 1401 – New Source Review of Toxic Air Contaminants
- ◆ Regulation XXX - Title V Permit
- ◆ Permit to Construct
- ◆ Permit to Operate – Source Testing

CIWMB – Odor Impact Mitigation Plan



CA Integrated Waste Mgmt. Board

Non-Disposable Facility Element (NDFE)

- ◆ Adheres to Enforcement Agency (EA) Notification Tier
 - ◆ Requires only a one page EA Notification form
 - ◆ No Solid Waste Facility Permit is required
 - ◆ No NDFE Modification is required
- ◆ Does Not Adhere to Enforcement Agency (EA) Notification Tier
 - ◆ Solid Waste Facility Permit is required
 - ◆ NDFE Modification is required

Regional Water Quality Control Board

Waste Discharge Requirements and National Pollutant Discharge Elimination System

- ◆ CEQA Required with Notice of Determination
- ◆ Notice of Intent
- ◆ Storm Water Pollution Prevention Plan
- ◆ Storm Water Monitoring Plan

City Permits

- ◆ Multiple Department Permits
 - ◆ Fire, Planning, Engineering, Building and Safety
- ◆ Specific Submittal Requirements
- ◆ Multiple Planning Review and Permit Fees
- ◆ Multiple Departments = Multiple Schedules
- ◆ Inspection Requirements

State DHS

- ◆ Specialty Permits for Use of Recycled Water
 - ◆ Preparation of an Industrial Engineering Rpt.
 - ◆ Preliminary Cross Connection
 - ◆ Final Cross Connection

Lesson Learned

- ◆ Over Communication with Regulators is not Possible
- ◆ Present Permits to Regulators
- ◆ Permits = Critical Path Item
- ◆ Identify Unique Permits
- ◆ Review Permit Process with Regulators