

7/27/2016

Comments and questions regarding the "Site Specific Land Application Plan for Rosman Farms Unit; Permit No. BT9902

Submitted by Donald Hanson; property owner in Township 26N, Range 37E, Section 20.

### Comments

2.0 – The application of biosolids must meet more than just WAC 173-308-160 Table 3 (e.g. WAC 173-308-170 and WAC 173-308-270.

3.0 – Setback boundaries and anomalies are referenced inadequately to be on maps (unclear which maps have them, and I did not find them). Additional specifics such as site acreage and staging/stockpiling locations also could not be found. Though there is a table of contents labeled appendices, I was unable to decipher where one appendix ends and the next appendix begins. In summary, this plan is lacking specifics important for the landowner to understand and abide by necessary measures and for state authorities to know with some assurance that the biosolids will not present pollution problems.

4.0 – Limitations to seasonal and daily timing of biosolids applications is left undefined. The proposal to have no limitations presents a significant potential for pollution to occur (e.g. during fall, winter, and spring months, when soils are either wet or frozen, surface runoff occurs quite readily; thus pollutants can easily flow into neighboring channels to the detriment of people and wildlife).

6.0 – It is my interpretation that the Field Acreage table describes the area over which biosolids will qualify for application. If that is the case, I recommend excluding application of biosolids to badlands since they consist of areas with multiple rock outcroppings. Application over such locations is dangerous in that runoff from rocks having biosolids applied is an invitation to readily pollute groundwater and/or surface water. Furthermore, the NRCS Soil Survey indicates that there are soils in the area with relatively shallow restrictive layers. It is advisable to indicate the location of any of these soil profiles also to make sure that biosolids are not applied to avoid groundwater pollution.

Numerous unfinished comments (highlighted in yellow) exist in the plan application. They clearly indicate incompleteness.

Necessary information (blank spaces) and required signatures are not included indicating that the plan is yet to be finished.

### Questions

4.0 – What the consequences of not considering requests from neighbors regarding the application of biosolids and conflicts with planned activities and/or special events?

10.4 – How will anyone know what trace elements exist in biosolids delivered for application?

12.0 – What is meant by "typical farming practices designed to reduce erosion?" This ought to be defined and best management practices ought to be chosen. Several soil series found in the area have relatively high K factors and T factors (Kuhl cobbly silt loam, Mondovi silt loam, Hanning silt loam, Dragon silt loam, Reardan silt loam, Tucannon silt loam, Broadax-Lance silt loam, Ewall loamy sand, and Badge-Bakeoven-Rock outcrop complex).

15.0 - To what documentation/record keeping are the neighbors entitled to have access to examine and report on the landowner's performance regarding operation of this biosolids plan?