



Ohio Water Environment Association

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Mr. Jacob Howdysshell
Ohio Environmental Protection Agency
Division of Surface Water
PO Box 1049
Columbus, Ohio 43216-1049

Re: Comments on Draft Sewage Sludge Draft (OAC 3745-40)

Dear Mr. Howdysshell:

The Ohio Water Environment Association (OWEA) hereby submits the following comments on the Ohio EPA's draft biosolids rule with this letter.

In general, we support the Ohio EPA's goal to make these rules easier to read and more understandable. However, OWEA does not support several key proposed rules, specifically those dealing with the definition of "unstabilized solids", restrictions on land application during winter months, restrictions on field storage, monitoring of field tile discharges, and other provisions. We understand that these are additions from the previous draft of the rule.

As a matter of history, when the Ohio EPA sought primacy of the 503 program, it began to collect annual fees based on dry tons of biosolids disposed of in landfills or which was land applied for beneficial use. The Ohio EPA's goal is to increase the beneficial use of biosolids. Due to the proposed restrictions sought, we believe that these draft rules, if adopted, will only increase the rate of landfill disposal, and this will occur with a portion of landfill tipping fees returning to the Ohio EPA for other program operations.

We appreciate the difficulties faced by the Ohio EPA in managing the biosolids program in a manner that balances the end goal of return to agricultural fields against odor and runoff problems that may arise in a few unfortunate circumstances. In addition, we urge the Ohio EPA not to unduly compare the benefits made in this program against problems experienced with concentrated animal feed lot operations.

OWEA appreciates the opportunity to provide comments on the revised Sludge Rules..

Best Regards,

Dianne M. Sumego, PE,
OWEA President

cc: David Brewer, Chair, OWEA Biosolids Committee
Mark J. Livengood, OWEA President Elect
Dale E. Kocarek, PE, OWEA Vice President
Judi Henrich, OWEA Executive Administrator

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