

BMP Element 4 — Legal and Other Requirements City of Richmond Public Utilities – Wastewater Treatment				
Date of Last Review 12/20/16	Revision 16	Revised By Biosolids Team	Revision Date 12/20/16	Supersedes all previous versions
		Approved By Biosolids Supervisor	Approval Date 12/20/16	

Purpose

The purpose of this element is to summarize the process used by the City of Richmond, Department of Public Utilities to identify and track legal and other requirements applicable to the biosolids program.

Scope

This procedure applies to biosolids management activities at all critical control points throughout the biosolids value chain.

Responsible Staff

The Biosolids Supervisor and Utility Plant Superintendents I & II are responsible for tracking all federal, state, and local legal and regulatory requirements pertaining to the Richmond Wastewater Treatment Plant biosolids. The Deputy Director II, Environmental Compliance Officer, Public Relations Manager, Chief Chemist, support these activities. The hauling/land application contractor is responsible for tracking the same requirements related to its activities.

Procedure

1. Sources of information about regulations and potential effects on the City’s biosolids program are as follows:
 - A. Updates from the National Biosolids Partnership (NBP), including periodic biosolids update e-mails, are available at <http://www.wef.org/biosolids;>
 - B. Information from the Virginia Department of Health is available at [http://www.vdh.virginia.gov/;](http://www.vdh.virginia.gov/)

- C. Information from the Virginia Biosolids Council is available at <http://www.virginiabiosolids.com>
 - D. Federal Environmental Protection Agency regulations are available and updated through the Federal Register website at <http://www2.epa.gov/laws-regulations/regulations> ;
 - E. The State of Virginia Department of Environmental Quality updates regulations on the following website: <http://www.deq.virginia.gov/>;
 - F. Federal pretreatment regulations 40CFR part 403 and amendments are available on the website: <https://www.epa.gov/>;
 - G. VPDES Permit for Wastewater Treatment Plant requirements are available on the following website:
<http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/PermitsFees.aspx> ;
 - H. Federal regulations on use and disposal of biosolids are detailed on the webpage:
http://www.access.gpo.gov/nara/cfr/waisidx_02/40cfr503_02.html;
 - I. Land application operations permit available under [Virginia Pollution Abatement Permit Regulation chapter 32](#);
 - J. Land application monitoring and measurements requirements, storage, application rates, and setbacks detailed in the following website: [federal regulation](#) and [State regulation](#).
2. Sources maintained by the hauling/land application contractor These information sources will be used to update and/or revise the City of Richmond’s biosolids procedures using the procedure outlined below. A list of legal requirements is found in Table 4.1 below.
3. Legal and other requirements are tracked by such mechanisms as attendance at professional meetings and conferences, advice from the Virginia Biosolids Council (VBC) or its principals, periodic review of regulatory and NBP websites, notices from regulators, input from Richmond Headquarters or other governmental affairs staff, review of professional journals and reports, VBC input, and Environmental Compliance Officer.
4. Changes in legal requirements affecting the biosolids value chain are communicated to staff and affect the operations of the biosolids value chain in the manner described below.
- A. The Utility Plant Superintendent II tracks all federal, state and local legal and regulatory requirements applying to the Richmond Wastewater Treatment Plant biosolids;
 - B. In the case of new permitted industries, the Environmental Compliance officer informs the Biosolids Supervisor of any new industrial/commercial sewer users that could impact operation of the wastewater treatment plant;

- C. Information gathered by the Environmental Compliance staff is evaluated for applicability to the biosolids value chain. Applicable regulatory information and updates are communicated to the Biosolids Supervisor through e-mail, meetings, or other means of communication;
- D. Regulatory information that is general or preliminary in nature is passed on to the BMP Team. The BMP Team will monitor the progress of pertinent legislation to determine when action is needed;
- E. Changes in legal or regulatory requirements that affect contractors' activities are passed on to contractor or from the contractor to the Biosolids Supervisor;
- F. If the regulatory or other updates require action, the Utility Plant Superintendent II will assign tasks related to the regulatory or process changes, ensuring they are accomplished in a timely manner;
- G. Changes in legal and other requirements may trigger changes in operational controls, SOPs monitoring and measurement, or other practices described in the BMP Manual. The biosolids supervisor will discuss the change with the operation supervisor to ensure associated changes are made to the appropriate BMP Manual element(s) and will bring revisions to the next regularly scheduled BMP team meeting;
- H. Laboratory regulation establishing test procedures for analysis of pollutants are detailed in following website:

http://www.epa.gov/region9/qa/pdfs/40cfr136_03.pdf

Table 4.1 List of Relevant Legal and Other Requirements				
NOTE: Follow the links below for detailed requirements.				
Regulation or Other Requirement	Required Report or Record	Due Date	Report or Record Location	Method used to comply with Regulatory requirement
Federal				
<p>Federal regulations on use and disposal of biosolids – 40 CFR Part 503 and amendments</p> <p>1For Pathogen reduction [40CFR 503.32(b)(3)] Appendix B- A3</p> <p>2Vector reduction [40 CFR 503.33(b)(1)(10)(i)]</p>	Annual Report	February 19	Filed in Utility Plant Superintendent II's office	Alternative 2 for Processes to Significantly Reduce Pathogens (PSRP) Anaerobic digestion (see SOP). Mean cell residence time and temperature shall be between 15 days at 35°C to 55°C and 60 days at 20°C
<p>Federal pretreatment regulations – 40 CFR Part 403 and amendments, see also attached Pretreatment permit, page 11</p>	Annual Report	January 31	Environmental Compliance Officer's Office	
<p>Laboratory regulation: 40CFR Part 136: Establishes test procedures for analysis of pollutants</p>	Monthly	By the 10th	Operator10™ application, Utility Plant Superintendent II's office.	
State				
<p>VPDES Permit for the Richmond Wastewater Treatment Plant</p> <p>Virginia Biosolids Regulation chapter 31</p> <p>[9 VAC 25.31.710 D3], Pathogen requirement</p> <p>[9 VAC 25.31.720 B-1], Vector reduction attraction and temperature</p> <p>[9 VAC 25.31.550], Management practices</p> <p>[9 VAC 25.31.710 B-6] for site restrictions.</p>	<p>Discharge Monitoring Report</p> <p>Biosolids Annual Report</p>	<p>10th of each month</p> <p>February annually</p>	<p>Operator 10™ on server</p> <p>Operator 10™ on server</p>	<p>Alternative 2 for processes to significantly reduce pathogens Anaerobic digestion (see SOP). Mean cell residence time and temperature shall be between 15 days at 35°C to 55°C</p>

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BMP Element 4 — Legal and Other Requirements

Hauling, land application, and storage facility requirements: Responsibility of the hauling/land application contractor (Recyc System), see Contract , VPDES Permit part I and Biosolids Management Plan known as Nutriblend's O&M manual . [9VAC25-32-550] for Storage Facilities	As Required under contract	As Required	In Contractor's Office and City P-drive	Recyc system' O&M describe the land application activities available on P-drive and in the Biosolids supervisor office
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