

Land Application of Sludge: Illegal Dumping or Beneficial Use?

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Major Topics

-  TCEQ Sludge Program
-  Types of land application sites
-  What to look for/ask for
-  Enforcement
-  Help from TCEQ

TCEQ Sludge Program

 Field Operations- 5 people state wide

 3 in Houston/R12

 1 in Dallas/ R4

 1 in Tyler/ R5

TCEQ Sludge Program

-  Scheduled Annual Comprehensive Compliance Investigations
-  Follow up Compliance Checks
-  Complaint Investigations
-  A Drive-by @ checks

Types of Sludge

 Wastewater Treatment Plant
Sludge

 Water Treatment Plant Sludge

 Domestic Septage

Similar Waste Types Not Allowed

 Grease Trap Waste

 Chemical Toilet Waste

 Grit Trap or Lint Trap Waste

Wastewater Treatment Plant Sludge

 Class A

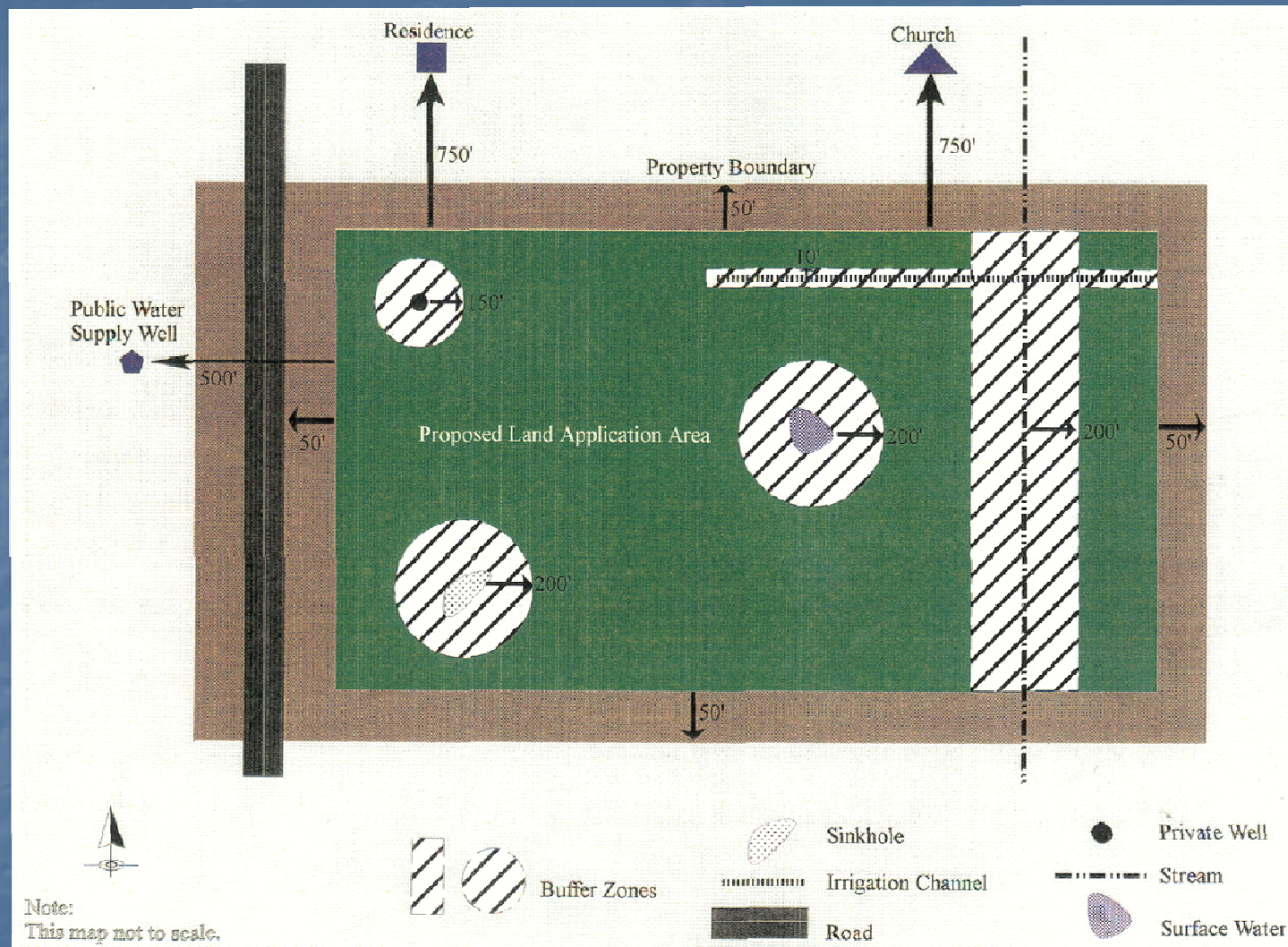
 Class B

Class A Sludge

- ❏ No permit or registration needed to land apply
- ❏ Fecal coliform < 1000 per gram
- ❏ Sold in bulk
- ❏ Sold for home use in garden centers/nurseries
- ❏ No manifest required

Class B Sludge

-  Permit required
-  Record keeping
-  Fecal coliform $< 2,000,000$
-  Site restrictions
-  Groundwater monitoring
-  Buffer zones
-  Manifest required






Beneficial Land Application: Buffer Zones
30 TAC Subsection 312.44

Types of Class B Sludge

 Cake

 Liquid

Methods of Application

-  Manure spreader (cake)
-  Spray bar (liquid)
-  Rain Gun and hose reel (liquid)








































Water Treatment Plant Sludge

-  Registration required
-  Filtrate from drinking water production
-  No fecal
-  Low nutrient value
-  Very few site restrictions
-  Manifest required






Domestic Septage

-  Registration required
-  Record keeping
-  pH adjustment for pathogen control
-  Site restrictions
-  Buffer zones
-  Manifest required





What To Look For/Ask For

-  Copy of Permit or Registration
-  Manifest
-  Transporter number and current stickers on trucks
-  Buffer zones observed
-  Site conditions


Transporters


-  Copy of transporter registration
-  Current registration sticker
-  Copy of manifest
-  Check truck for load
-  Transporter info on truck

Manifest (Trip Ticket)

-  Required for all but class A
-  Details generator, transporter, and receiver information
-  Type and amount of waste
-  Dates received and delivered

Enforcement

 30 Texas Administrative Code
(TAC) Chapter 312

 40 Code of Federal Regulations
(CFR) Chapter 503

 Texas Water Code (TWC)
Chapter 26

Common Violations

 Exceed staging time 30 TAC
312.50

 Failure to observe buffer zones
30TAC 312.44

 Uneven application 30 TAC
312.44

 Application to saturated soil 30
TAC 312.44

Violations continued

 Animals allowed to graze <30 days after application 30TAC 312.82

 No Permit/Registration or run-off of material TWC 26.121

 Odor











Local Enforcement

 Nuisance odor

 Unauthorized discharge

Help from TCEQ

 Houston Field Ops Sludge Team

 Austin Sludge Permits Team

Houston Field Ops Sludge Team

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