



# WATER ENVIRONMENT ASSOCIATION OF TEXAS

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June 28, 2007

Mr. Louis C. Herrin III, PE  
Texas Commission on Environmental Quality  
Water Quality Division  
Building F, 12100 Park 35 Circle,  
Austin, TX 78753

Dear Mr. Herrin:

The Biosolids Committee of Water Environment Association of Texas (WEAT) appreciates this opportunity to provide comments on the proposed 30 TAC 217 Subchapter J (Sludge) rule. Our review of this comprehensive proposed rule resulted in relatively few comments, reflecting I believe the strength of the rule and the many of hours of work that went into its development.

Comments compiled from the various committee members are attached for your consideration.

Again, thank you for the opportunity to provide these comments. Please feel free to contact me at 512-346-1100 or [mossilh@cdm.com](mailto:mossilh@cdm.com) if you have questions regarding the comments or need any additional information.

Sincerely,

Lynne Moss, PE, BCEE  
Biosolids Committee Chair

cc: WEAT Biosolids Committee

## Comments on Proposed 30 TAC 217, Subchapter J

### 217.242 Control of Sludge and Supernatant Volumes.

- 217.242 (a) indicates that supernatant "must be returned to the head of the treatment works and discharged at a point preceding the aeration system or preceding the secondary treatment system." This statement could be interpreted as allowing the return to be discharged at any point preceding the activated sludge system, which makes sense because dewatering filtrate has low suspended solids and does not require primary clarification. Clarification of this rule is suggested, however, to ensure that this interpretation is the intent of the rule.
- 217.242 (a) (and also (217.250 (c) (1) (A))). A better description of what is meant by the head of the treatment works or head of the facility is suggested. Does the head of the treatment works/facility include preliminary or primary treatment?
- 217.242 (a) should include filtrate with supernatant or centrate.
- 217.242 (a) does not appear to limit the supernatant from digestion or dewatered digested supernatant from being processed in a side stream treatment technology. Is that interpretation correct?

### 217.245 Exclusion of Grit and Grease

- 217.245 (c) Suggest that the word "all" be deleted, as it is not possible to removal all screenings, grit, and grease from sludge.

### Chapter 217.246 Ventilation and Odor Control

- 217.246 (b) requires that enclosed areas have either continuous or intermittent mechanical ventilation. This requirement should be limited to areas that have the potential to be occupied.
- 217.246 (b) (1) and (2). The requirement that enclosed areas be ventilated continuously at 30 air changes per hour or intermittently at 6 air changes per hour is inconsistent with other ventilation requirements in the rule, (e.g. 217.60 Lift Stations). If the TCEQ wished to retain the continuous/intermittent ventilation approach in the rule, we suggest that 217.246 be consistent with 217.60, e.g. intermittent ventilation systems must provide 30 air exchanges per hour and continuous systems must provide 6 air exchanges per hour. This approach is also more consistent with continuous ventilation rates that are used in practice (generally 6-12 ac/hr) and "purge" ventilation rates (30 ac/hr) used for intermittently ventilated areas.

Alternately, you may wish to revise ventilation requirements in all sections to note that, at minimum, all enclosed areas shall be ventilated in accordance with the latest edition of the National Fire Protection Association Standard for Wastewater Treatment and Collection Facilities. This standard addresses ventilation needs for electrical classifications, but is typically used as a “baseline” for establishing ventilation rates.

#### 217.248 Sludge Thickening

- 217.248 (d) (4) The correct section referenced should be 217.242 (not 217.241).
- We noted that design criteria are not included for gravity belt thickeners (GBTs). As these are one of the most commonly applied thickening technologies, we would like to see criteria included for GBTs. The Biosolids Committee is willing to assist with writing of such criteria if you wish.

#### 217.249 Anaerobic Digestion

- 217.249 (c) 4(d) requirements for a "supernatant volume of minimum 6 foot" are not applicable to complete mix systems. The requirement for supernatant storage is also reflected in 217.249 (j) (2) (e) "allowance for sludge and supernatant storage".

#### 217.250 Sludge Dewatering

- Chapter 217.250(c)(3)(B), Sludge Dewatering Redundancy. The draft regulations specify that dewatering units cannot operate more than 60 hours during any 6-day period. This requirement may apply to small plants, but may be less applicable to larger plants with multiple dewatering units. Perhaps this should be qualified as applying to plants <5 MGD capacity. Also, this rule does not appear to be consistent with the 217.250(c)(4) Storage, which refers to a condition involving continuous operation of dewatering units (implying that continuous operation of dewatering units is acceptable).
- 217.250 (c) (1) (A) See comment on 217.242 (a) above