



Domestic Septage Land Application

WEAT's Position

WEAT's position is that the public should be able to exercise due process over the land application of domestic septage. Domestic septage should be required to meet the minimum standards of biosolids for land application, and should be regulated and permitted similarly if not more rigorously, given the lack of treatment afforded to that type of waste.

Definitions

Domestic septage is untreated raw sewage from portable toilets, septic tanks, and recreational vehicles. Biosolids are nutrient enriched solids treated to meet federal and state standards, which are subsequently applied for beneficial use as a soil amendment.

Explanation

Applying biosolids to the soil for agriculture use offers a cost-effective way to manage a resource and avoid the expense of purchasing unnecessary chemicals. However, restrictions on the land application of biosolids differ greatly from the restrictions on the land application of domestic septage. According to Texas Administrative Code 30 TAC 312, Class A, AB, and B biosolids must undergo pathogen and vector attraction reduction treatment to reduce risk and odor before being land applied. The same stringent requirements do not apply to domestic septage.

Furthermore, Class A, AB, and B biosolids land application sites must be permitted and not simply administratively "registered" like domestic septage sites. As a result, biosolids undergo rigorous notice and reporting requirements, and the public is allowed to participate in the process of permitting those sites. The registration process for domestic septage does not require public notice or participation, which among other things, denies the public the ability to meaningfully participate in the process for siting and operating domestic septage waste disposal sites.

For these reasons among others, WEAT does not support the current treatment of domestic septage disposal sites. We believe that domestic septage should be treated as rigorously as biosolids, which are beneficial to the agricultural business and economy of the State of Texas.