

## **SLUDGE PERMIT PROCESS ISSUES**

### **1. BOND**

Bond of \$200,000 too low

### **2. SUPPLEMENTAL MONITORING AGREEMENT**

- a. Implement Supplemental monitoring agreement
- b. Can County include more restrictions in Supplemental Monitoring Agreement

### **3. ANIMALS**

How to restrict animals from property

### **4. BUFFER-SETBACK**

Increase buffer setback distance

### **5. COUNTY RESTRICTIONS**

- a. Can County limit time of day and temperature?
- b. Can application be restricted by weather conditions, saturated soil, temperature?

### **6. COMPLAINTS**

- a. System to track complaints
- b. How are complaints received and handled?

### **7. ENFORCEMENT**

- a. How does MDE ensure limits of maximum application over 3 years, tonnage and ratio of land to watershed
- b. How are odor standards measured?
- c. Should there be written requirements for monitoring and enforcement?
- d. How does MDE test for concentrations of metals to ensure limitations?
- e. Why is testing done on only 9 metals and not radioactive substances?
- f. What if it is applied incorrectly?

### **8. EVENT**

- a. What happens if there is a major mistake? How is it mitigated?
- b. What if there is a hurricane?

### **9. HEALTH RISKS**

- a. What are effects of airborne exposure?
- b. What is the mitigation if there is a bacterial problem?
- c. What are specific illnesses if exposed?

**10. RUNOFF**

- a. Risk of runoff
- b. Why is there no requirement for a topo survey or engineering study required in order to look at slope, runoff, etc.
- c. How does MDE determine no flooding within 25 years?
- d. What about microbial drift to adjoining properties?
- e. How can runoff be handled if adjoining property owners are affected?
- f. How is sludge kept on property if rainstrom

**11. POST-INSPECTION**

Why does MDE not return to site after application for inspection?

**12. SIGNAGE**

Can signage be posted at every 50'

**13. SOILS**

Report testing of soil (sandy etc.)

**14. WATER QUALITY**

- a. How sludge program affects nutrient program, WIP and runoff of nitrogen to bay?
- b. What are the effects of sludge application on WIP and TMDL.
- c. Is no consideration given to location of site in relation to waterways?
- d. How are aquifers protected
- e. Are shallow wells more susceptible? Are there standards about concentration in well water?