Permitting Issues for Biosolids Composting and Processing Facilities

SCAP – Biosolids Emerging Technology Workshop

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Pre-Permit Items

- California Environmental Quality Act
  - Project Description
  - Initial Study
  - Mitigated Negative Declaration or
  - Environmental Impact Report
- Environmental Impact Report
- Source Reduction and Recycled Element
Potential Permits

- Conditional Use Permit
- South Coast Air Quality Management District
- California Integrated Waste Mgmt. Board
- Regional Water Quality Control Board
- City Permits
- State Department of Health Services
South Coast Air Quality Mgmt. District

Rule 1133 and Friends

- Rule 1133.2 – Emission Reduction from Co-composting Operations
- Regulation XIII - New Source Review
- Rule 1401 – New Source Review of Toxic Air Contaminants
- Regulation XXX - Title V Permit
- Permit to Construct
- Permit to Operate – Source Testing
CIWMB – Odor Impact Mitigation Plan
Non-Disposable Facility Element (NDFE)

- Adheres to Enforcement Agency (EA) Notification Tier
  - Requires only a one page EA Notification form
  - No Solid Waste Facility Permit is required
  - No NDFE Modification is required

- Does Not Adhere to Enforcement Agency (EA) Notification Tier
  - Solid Waste Facility Permit is required
  - NDFE Modification is required
Regional Water Quality Control Board

Waste Discharge Requirements and National Pollutant Discharge Elimination System

- CEQA Required with Notice of Determination
- Notice of Intent
- Storm Water Pollution Prevention Plan
- Storm Water Monitoring Plan
City Permits

- Multiple Department Permits
  - Fire, Planning, Engineering, Building and Safety
- Specific Submittal Requirements
- Multiple Planning Review and Permit Fees
- Multiple Departments = Multiple Schedules
- Inspection Requirements
State DHS

- Specialty Permits for Use of Recycled Water
  - Preparation of an Industrial Engineering Rpt.
  - Preliminary Cross Connection
  - Final Cross Connection
Lesson Learned

- Over Communication with Regulators is not Possible
- Present Permits to Regulators
- Permits = Critical Path Item
- Identify Unique Permits
- Review Permit Process with Regulators