

Metropolitan Water Reclamation District of Greater Chicago

RESEARCH AND DEVELOPMENT DEPARTMENT

REPORT NO. 08-57

REPORTING REQUIREMENTS FOR SITE-SPECIFIC EQUIVALENCY TO PFRP DESIGNATION OF MWRDGC BIOSOLIDS PROCESSING TRAINS AT THE STICKNEY AND CALUMET WATER RECLAMATION PLANTS JANUARY – JULY, 2008

SEPTEMBER 2008

Metropolitan Water Reclamation District of Greater Chicago

100 EAST ERIE STREET

CHICAGO, ILLINOIS 60611-3154

312-751-5600

Terrence J. O'Brien President
Kathleen Therese Meany Vice President
Gloria Alitto Majewski Chairman of Finance
Frank Avila
Patricia Horton
Barbara J. McGowan
Cynthia M. Santos
Debra Shore
Patricia Young

BOARD OF COMMISSIONERS

Louis Kollias, P.E., BCEE
Director of Research and Development
312:751:5190

September 30, 2008

Mr. Valdis Aistars United States Environmental Protection Agency Region 5 77 West Jackson Boulevard, WC-15J Chicago, IL 60604-3590

Dear Mr. Aistars:

Subject: Letter WN-16J Reporting Requirements for Site-Specific Equivalency to Procedure to Further Reduce Pathogens Designation of the Metropolitan Water Reclamation District of Greater Chicago Biosolids Processing Trains at the Stickney and Calumet Water Reclamation Plants – January to July 2008

In your letter dated June 20, 2002 (Reference Number WN-16J), you informed us that the low and high solids biosolids processing trains at the Stickney and Calumet WRPs were designated on a site-specific basis as being equivalent to Procedure to Further Reduce Pathogens (PFRP). In a letter dated September 6, 2006, you informed us that this certification was renewed for another two years, effective August 1, 2006 to July 31, 2008. The terms of the site-specific designation require us to operate the designated biosolids processing trains in full compliance with the codified operating parameters outlined in our approved petition, and to collect and analyze twelve samples for enteric viruses and helminth ova during the first year of operation (August 1, 2006 to July 31, 2007) and six samples during the second year of operation (August 1, 2007 to July 31, 2008).

We are required to submit monitoring data for three samples for the period January 1, 2008 through July 31, 2008, for both the Stickney and Calumet water reclamation plants (WRPs). Monitoring data for three samples are reported in the attached table for the Calumet WRP. All of the samples meet the Part 503 analytical standards for the Class A pathogens, including those for enteric viruses and helminth ova. For the Stickney WRP, no monitoring data are presented in this report because the biosolids generated during the period were not PFRP-compliant with respect to the digester holding time criteria in the codified operations. Failure to meet the holding time criteria was due to reduction in digester capacity, resulting from digesters being removed from service for cleaning and repairs. Therefore, all biosolids generated by the

Subject: Letter WN-16J Reporting Requirements for Site-Specific Equivalency to Procedure to Further Reduce Pathogens Designation of the Metropolitan Water Reclamation District of Greater Chicago Biosolids Processing Trains at the Stickney and Calumet Water Reclamation Plants – January to July 2008

Stickney WRP during the period were tested for pathogen compliance according to 40 CFR Part 503.32a5 before being utilized as Class A, or were managed as specified in Item 10 of the certification.

We conducted an internal audit of the Metropolitan Water Reclamation District of Greater Chicago's Analytical Microbiology Laboratory on June 6, 2008, and it was found to be in full compliance with all USEPA requirements for analysis to determine compliance with the Part 503 Class A pathogen standards. In addition, the operation of the high and low solids biosolids processing trains were subjected to internal audits on June 3, 2008, at the Calumet WRP, and on June 9, 2008, for the Stickney WRP. Attached is a signed certification that the processing trains were operated in full compliance with the codified parameters.

If you have any questions, please contact Dr. Thomas Granato, Assistant Director of Research and Development, at 708-588-4059.

Very truly yours,

Louis Kollias Director Research and Development

LK:AC:kq
Attachments
cc: Lanyon/Jamjun/Garelli
Sharma/Conway/Stuba
Granato/O'Connor/Cox/Rijal/Lindo

MICROBIOLOGICAL ANALYSIS OF BIOSOLIDS GENERATED BY THE CALUMET WRP SOLIDS PROCESSING TRAINS IN COMPLIANCE WITH PART 503 PFRP-EQUIVALENT REQUIREMENTS JANUARY THROUGH JULY 2008 MONITORING PERIOD

Date Sampled	Location	Fecal Coliform	Viable Helminth Ova	Enteric Virus
		- No./g -	- No./4g -	- PFU/4g -
04/22/08	Calumet West	100	< 0.0133	< 0.8000
05/20/08	Calumet West ¹	48	< 0.0800	< 0.8000
7/01/08	Calumet West	34	< 0.0133	< 0.8000

¹For helminth ova analysis, sample weight = 50g. For other samples, sample weight = 300g.

CERTIFICATION

I do hereby certify that for the period from August 1, 2007 through December 31, 2007, the Low Solids Sludge Processing Train (LSSPT) and the High Solids Sludge Processing Train (HSSPT) at the Metropolitan Water Reclamation District of Greater Chicago's Stickney and Calumet Water Reclamation Plants (WRPs) were operated in full compliance with the following codified protocol, as required by the USEPA's site specific designation of equivalency to PFRPs:

- 1. An average detention time of 20 days at a temperature of $35 \pm 2^{\circ}$ C (95 $\pm 3.6^{\circ}$ F) is maintained in the anaerobic digesters.
- 2. In the case of the HSSPT system, anaerobically digested sludge (at 3 to 5 percent solids), which is withdrawn daily from the digesters, is then dewatered using Sharples Model 76000 centrifuges from 20 to 30 percent solids.
- 3. In the case of the LSSPT system, digested sludge (at 3 to 5 percent solids) withdrawn daily from the digesters, and which is not subjected to centrifugal dewatering, is pumped into a LSSPT lagoon to achieve further stabilization, dewatering, and inactivation of pathogens.
- 4. The minimum sludge holding time for both the HSSPT and LSSPT lagoons is 1.5 years to ensure the aging and stabilization of sludge solids, and inactivation of pathogens.
- 5. Air-drying of sludge solids taken out of the HSSPT and LSSPT lagoons is carried out seasonally from April through November.
- 6. Air-drying is conducted such that any batch of sludge applied onto the drying areas is held without any further additions of sludge, until 60 percent total solids content is achieved.
- 7. Loading of drying cells is conducted such that air-drying of the sludge solids taken out of the HSSPT and LSSPT lagoons is done at no more than 410 and 230 dry tons per acre of the paved drying cells, respectively. Sludge solids taken out of the HSSPT and LSSPT lagoons are applied on the drying cells at depths of no more than 18 and 15 inches of sludge, respectively, to be consistent with the loadings of 410 and 230 dry tons per acre.

- 8. Agitation drying is conducted such that complete turning, aeration, and agitation of solids withdrawn from the LSSPT and HSSPT is accomplished at an average of three times a week using equipment such as a tractor with a horizontal auger or a tiller.
- 9. The short circuiting of sludge through the SPTs was eliminated by ensuring that,
 - (a) No additional batches of sludge are added to the field lagoons, where sludge is undergoing aging, dewatering, and inactivation, and
 - (b) A batch of sludge undergoing air drying on the paved drying beds is not mixed with any other batches of sludge during the drying process.
- 10. Sludge generated by unit processes not meeting the PFRP codified parameters listed above was segregated from the certified processing trains and managed according to the appropriate requirements of 40 CFR Parts 503 or 257.

Osoth Jamjun	Date
Chief of Maintenance & Operations	