Element 04 – Legal and Other Requirements
Version Number: 3
Version Date: October 17, 2011

Purpose
The following describes the District’s procedures for identifying and tracking federal, state, local, and voluntarily adopted legal and other requirements applicable to the District’s biosolids management program.

Responsible Parties
EMS Coordinator
Technical Projects Unit Head
Executive Director
Division Heads
Director of Monitoring & Research

Procedures
1. The M&O Technical Projects Unit Head is responsible for tracking proposed or actual legislation and regulations that may affect the District’s biosolids management activities. Designated staff will actively track information sources for potential or actual regulatory changes that could affect the District’s biosolids management activities. The main source for information are the NACWA “e-alerts” sent directly to the TP Unit Head and other District staff via email, but also may include the Environment Register, Federal Register notices, USEPA notices, the EPA Region V Biosolids homepage, the NBP website, WEF, and other compliance newsletters.

2. The Technical Projects Unit Head will initiate a memo to the Division Heads and Director of Monitoring & Research requiring review of any potential or actual regulatory changes for potential impacts on biosolids operational activities.

3. After identifying such regulatory changes, the Technical Projects Unit Head will prepare a memo for signature by the Executive Director directing the Division Heads and Director of Monitoring & Research to:
   a. Adjust operational controls and measures to ensure compliance with the revised laws and regulations.
   b. Review and revise the associated CCPs, Standard Operating Procedures; Operational Controls; Monitoring & Measurement; and Environmental Impacts as required, as a result of the regulatory change. Proposed changes to these affected Elements will be forwarded to the EMS Coordinator by the Division Heads and the Director of Monitoring & Research.

4. Designated staff are to attend conferences and seminars on an as-needed basis to expand their knowledge and understanding of regulatory requirements and to be made aware of regulatory issues and to communicate these issues to District staff.

5. Staff is encouraged to retain membership and participate in organizations such as the WEF, NACWA, the Illinois Association of Wastewater Agencies (IAWA) and the Illinois Water
Environment Association (IWEA). District staff will participate in collective responses to legal/regulatory issues initiated by such organizations.

6. A summary of changes to binding legal requirements affecting the District’s biosolids management program will be published in the Biosolids Program and Annual EMS Performance Report described in Element 15.

References
Document 04.1 – Biosolids Regulations
Document 04.2 – Current Biosolids Operating Permits
Document 04.3.1 – Reporting Rqmts HP NPDES
Document 04.3.2 – Reporting Rqmts HP Fisher Farm
Document 04.3.3 – Reporting Rqmts Egan NPDES
Document 04.3.4 – Reporting Rqmts Egan Solids Drying Areas
Document 04.3.5 – Reporting Rqmts Egan Backup Solids Drying Areas
Document 04.3.6 – Reporting Rqmts Kirie NPDES
Document 04.3.7 – Reporting Rqmts North Side NPDES
Document 04.3.8 – Reporting Rqmts Stickney NPDES
Document 04.3.9 – Reporting Rqmts Stickney Solids Drying Areas
Document 04.3.10 – Reporting Rqmts Calumet NPDES
Document 04.3.11 – Reporting Rqmts Calumet Solids Drying Areas
Document 04.3.12 – Reporting Rqmts Lemont NPDES
Document 04.3.13 – Reporting Rqmts CSD
Document 04.3.14 – Reporting Rqmts Fulton County
Document 04.3.15 – Reporting Rqmts Land Application
Document 04.4 – Biosolids Products/Compliance Parameters
Document 04.5 – Biosolids Products and Legal Requirements/Vehicles
Element 15 – Biosolids Program and Annual EMS Performance Report

Revision History

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<th>Version Number</th>
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<th>Description of Revision</th>
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<tr>
<td>0</td>
<td>7/28/05</td>
<td>Original issue.</td>
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<tr>
<td>1</td>
<td>3/19/07</td>
<td>Changed main source of legal information to indicate NACWA e-alerts.</td>
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<td>2</td>
<td>4/22/2009</td>
<td>Updated Position Titles for Division Heads and Element 15 Title of Report</td>
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