Message

From: Fondahl, Lauren [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8FCC41D8B83844B3B5483FE20B153452-LFONDAHL]
Sent: 6/24/2021 2:35:56 PM
To: Tejero-leon, Matias@Waterboards [Matias.Tejero-leon@Waterboards.ca.gov]
CC: Schlipf, Robert@Waterboards [Robert.Schlipf@waterboards.ca.gov]; Monahan, Margaret@Waterboards [Margaret.Monahan@Waterboards.ca.gov]
Subject: RE: 503 Reports
Attachments: EPA Biosolids Annual Report(s) Certified; Santa Rosa Laguna.msg; EPA Biosolids Annual Report(s) Certified

Hi Matias,

Glad you're doing well now!

Attached are the reports submitted into EPA's CDX reporting system by Vallejo, Santa Rosa, and Napa. EPA's CDX system which started up in 2017, only requires reporting on the quality of the biosolids.
Previously, EPA Region 9 would get hard-copy reports that also included information on fields applied to and crops grown. Napa continues to send in this data as an attachment (see their attachments). Santa Rosa has continued to send it in hard-copy as part of their pretreatment report – it's probably sitting in our office and we could request a pdf of it. I think Vallejo continues to send a report on the land application site to the Regional Board.

What does "SLR" stand for? At this point, I would probably support putting the sites under the General Order but with special RB 2 provisions, or requiring a specific WDR – but watching for developments with rule-making on PFAS / PFOA and microplastics.

Regional Board 1 required the City of Eureka to stop land applying biosolids to a site that was a historic wetland prior to being diked and developed into farmland in the early 1900's.

I'm attending a meeting this morning EPA and state biosolids representatives – I think Brianna St. Pierre from the SWRCB will be representing California (the organizers are only allowing one person per state). I'm planning to bring up the issue of reporting on land application sites, and can ask if others have addressed application on former wetlands or proximity to them.

Thanks,

Lauren

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From: Tejero-leon, Matias@Waterboards <Matias.Tejero-leon@Waterboards.ca.gov>
Sent: Wednesday, June 23, 2021 3:58 PM
To: Fondahl, Lauren <Fondahl.Lauren@epa.gov>
Cc: Schlipf, Robert@Waterboards <Robert.Schlipf@waterboards.ca.gov>; Monahan, Margaret@Waterboards <Margaret.Monahan@Waterboards.ca.gov>
Subject: 503 Reports

Hi Lauren,

I hope all is well. Apologies for not making it to the biosolids training last month. Unfortunately, I had a medical emergency in mid-May, but I am doing well now. Also, thank you for providing the training slides too. I appreciate it!

I am reaching out to you to see if you could provide the 503 Reports for Santa Rosa, Napa, and Vallejo from last year at your convenience? This all relates to how R2 will manage sites that currently apply biosolids as a beneficial use to land within the historic baylands margins. Since the fate and transport of the constituents (PFAS, organics, microplastics) from biosolids to surface waters and groundwater within the baylands (specifically San Pablo Bay) are not clearly understood, one of the Region's concerns is the effect of SLR to such sites.

At the moment, R2 is in discussion to find the best option to manage these sites (Vallejo, Santa Rosa, Napa), because these sites are following the 503 regulations and are not under any Order or WDR. Below is list of options and ideas:

- These sites continue to follow the 503 Regulations,
- Enroll these sites in the State General Order as is,
- Enroll these sites in the State General Order with conditions set by R2,
- Do not authorize, therefore, R2 will not issue a NOA (?),
- Prohibit the application of biosolids to such areas via a Basin Plan amendment,
- Develop individual or regional WDRs,
- Work with these dischargers to identify alternative locations, or
- Work with State Water Board to put a hold on SB 1383 implementation until the impacts from land applied biosolids within the historic baylands margins is understood more.

Out of curiosity, what would be your thoughts or opinions regarding how to manage biosolids land application to areas susceptible to SLR? Has EPA encountered this situation somewhere else?

Appreciate your time and concern! Thank you!

Cheers,

Matias Tejero-Leon
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"If by some fiat I had to restrict all this writing to one sentence, this is the one I would choose: The summit of Mt. Everest is marine limestone." **-John McPhee**

"Any observer is an intruder in the domain of a wild animal and must remember that the rights of the animal supersede human interests. An observer must also keep in mind that an animal's memories of one day's contact might will be reflected in the following day's behavior." **-Dian Fossey**

"Those who cannot understand how to put their thoughts on ice should not enter into the heat of debate." - **Friedrich Nietzsche**