



WATER AND WASTEWATER COMMISSION RECOMMENDATION 20170614-E1

Date: June 14, 2017

Subject: Policy Recommendations on Biosolids Management

Motioned By: Moriarty

Seconded By: Maia

Recommendation

The Water and Wastewater Commission reviewed the Zero Waste Advisory Commission's amendments to the Biosolids Policy Recommendations of the Joint Working Group and recommends that all of those amendments be rejected and the policy document generated by the joint working group remain as originally authored, October 12, 2016. See Attached E-1

Description of Recommendation to Council

See attached documents.

Rationale:

Review of ZWAC's modifications to the Joint Committee's Policy on Biosolids Management are concerning. The original policy was developed in a partnership with representation of both commissions. To further modify this policy without equal representation shows a display of authoritarianism and possible bias to promote one side's objective which may not be in the best interest of all stakeholders.

In a more detailed review of the modifications there are specific concerns that these revisions would:

- 1. Prevent the highest and best use of the biosolids commodity and limit it to a market of compost that is not currently sustainable.*
- 2. Mandate excessive testing methods which would delay the production of the commodity and increase production costs.*
- 3. Add ambiguous terms such as "best practices" to control procedures when the document is intended to be a policy on management not means and methods.*
- 4. Allow for bureaucratic manipulation during emergency situations when trained and licensed experts should be in control to quickly remedy the situation while protecting the public and the environment.*
- 5. Allow for third party review of proprietary information included in competitive bids which is not proper etiquette*

Vote 10-0

For: Moriarty, Maia, Penn, Blanding, Turrieta, Lee, Michel, Ho, Kellough & Parton

Against: 0

WATER AND WASTEWATER COMMISSION RECOMMENDATION 20170614-E1

Abstain: 0

Absent: Castleberry

Attest: Liaison



Felicia Cancino, WWW Commission Liaison

Water and Wastewater Commission's review and recommendation of ZWAC's modifications to the Biosolids Policy

Review of ZWAC's modifications to the Joint Committee's Policy on Biosolids Management are concerning. The original policy was developed in a partnership with representation of both commissions. To further modify this policy without equal representation shows a display of authoritarianism and possible bias to promote one side's objective which may not be in the best interest of all stakeholders.

In a more detailed review of the modifications there are specific concerns that these revisions would:

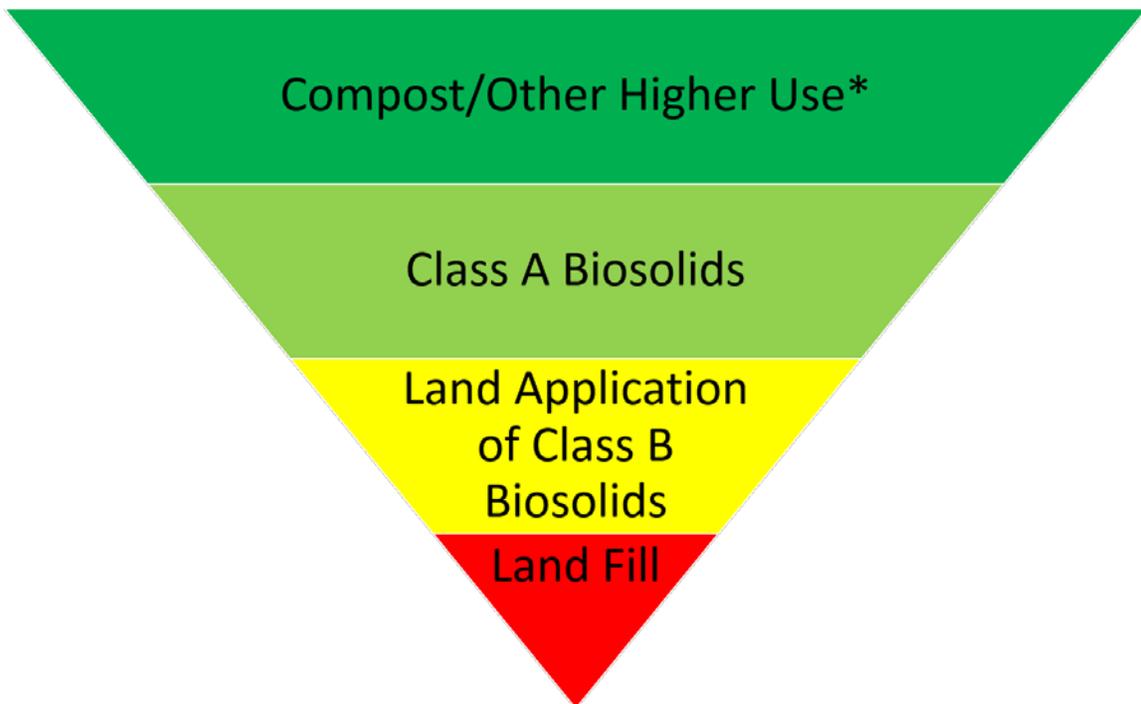
- Prevent the highest and best use of the biosolids commodity and limit it to a market of compost that is not currently sustainable.
- Mandate excessive testing methods which would delay the production of the commodity and increase production costs.
- Add ambiguous terms such as "best practices" to control procedures when the document is intended to be a policy on management not means and methods.
- Allow for bureaucratic manipulation during emergency situations when trained and licensed experts should be in control to quickly remedy the situation while protecting the public and the environment.
- Allow for third party review of proprietary information included in competitive bids which is not proper etiquette

It is the recommendation of the Water and Wastewater Commission that the original policy of biosolids management as generated by the joint working group remain as originally authored

[WWW/ZWAC Joint Working Group](#)
[Zero Waste Advisory Commission](#)
Biosolids Management Policy Recommendations

- 1) Biosolids management should honor the highest and best use hierarchy. The City will strive to treat all wastewater sludge to [Class A designation](#), [make compost that meets the United States Compost Council's definition of compost](#) prior to final distribution.

[Comment: The revision limits the use to strictly compost. This limitation will prevent the highest and best use of the product.](#)



*Excludes methods utilizing combustion

- 2) Require production of compost that meets or exceeds United States Compost Council Seal of Test Assurance [standards](#), [\(STA\) standards. STA samples shall be collected by independent third parties or City staff and tested by an independent third party.](#)

[Comment: STA testing by a third party will add a significant amount of time and cost to the production of Class A biosolids. The City has several tests to ensure STA compliance and the desired quality. STA testing could be included intermittently as a benchmark if desired.](#)

- 3) Plastics shall be ~~predominately~~ removed from all final products— utilizing best management practices.

Comment: “best management” is an ambiguous term to define a procedure, this document is meant to be a policy for biosolids management, contractor is responsible for means and methods

- 4) Under emergency conditions, land application of unscreened compost, Class A biosolids, or Class B biosolids may be made on a temporary basis.
 - a) Emergency conditions are defined as severe fire risk, other imminent threats to health and safety, or imminent risk of regulatory non-compliance that could not have reasonably been foreseen.
 - b) If time permits, plastics should still be predominately removed before land application.
 - c) Emergency application of these lower quality products shall extend only as long as necessary to alleviate emergency conditions.
- 5) Austin Water staff shall inform the City Council via a Corrective Action Memo within five business days of declaration of emergency conditions. The Memo shall specifically describe the procedure and timeline by which the contractor and staff plan to return to normal operations in the shortest possible timeframe.

Comment: Under emergency conditions the City must act immediately to remedy the situation. Additional specific reporting requirements suggest bureaucratic control in an emergency situation which should be handled by trained experts.

- 6) Austin Water Operations will be conducted in a manner that will keep odors and pests to a minimum. Specific procedures for accomplishing this shall either be included in any contracts prior to final review by Commissions and Council or shall be brought to the Zero Waste Advisory Commission and Water Wastewater Commission within 90 days of the contract’s execution.

Comment: the intent of this document is to set a policy for biosolids management. This reporting requirement suggests micromanaging third party control over contractor’s means and methods not policy.

- 7) All products produced using biosolids will be clearly labeled to inform the end user of that fact.
- 8) The Dillo Dirt trademark name and compost quality will remain in City of Austin control, regardless of who produces the product—, and should be defined by prescriptive processing requirements determined by Austin Water staff.

Comment: “process requirements” are means and methods not policy.
Micromanaging a contractor in any situation will drive up operating costs.

- 9) Austin Water and Austin Resource Recovery should continue to vet and pilot new technologies and management strategies in line with active policies that will improve biosolids handling.
- 10) Austin Water and Austin Resource Recovery will continue to communicate with other [cityCity](#) departments when contracts are being renewed or solicited to ensure any partnering opportunities are explored.
- 11) Bulking agents should be limited to by-products of other known activities and not include painted or chemically treated lumber, asbestos, or other contaminants inappropriate for compost products or land application.
- 12) Any contract that impacts these policies should come before the Zero Waste Advisory Commission, in addition to any other relevant Commissions, before they go to City Council for consideration of approval.

Comment: Contracts are administered through the City’s purchasing department.
Any deviation from their current procedure must be approved by them



**WATER AND WASTEWATER COMMISSION RECOMMENDATION
20161012-E1**

Date: October 12, 2016

Subject: Policy Recommendations on Biosolids Management

Motioned By: Commissioner Michel

Seconded By: Commissioner Castleberry

Recommendation

Joint Working Group Policy Recommendations approved on Commissioner Michel's motion and Commissioner Castleberry's second on a 9-1 vote.

Description of Recommendation to Council

See Attached Policy Recommendation by the Joint Working Group (Water & Wastewater Commission & Zero Waste Advisory Commission)

Rationale:

Policy Recommendations on Biosolids Management by the Joint Working Group (Water and Wastewater Commission & Zero Waste Advisory Commission) approved by the WWW Commission

Vote 9-1

For: Castleberry, Michel, Maia, Penn, Lee, Ho, Turrieta, Blanding & Parker

Against: Kellough

Abstain: 0

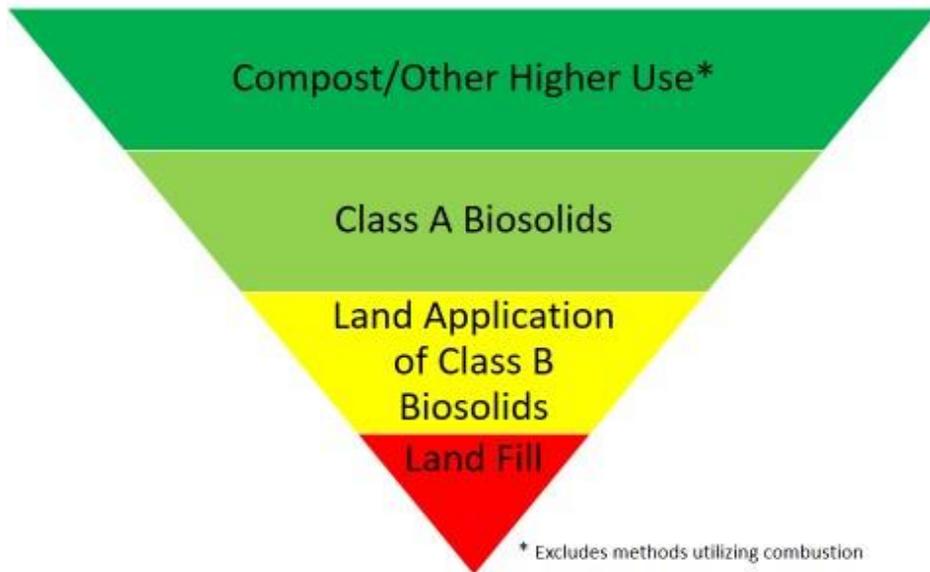
Absent: Moriarty

Attest: Liaison

Staff Liaison, Felicia Cancino

**WWW/ZWAC Joint Working Group
Biosolids Management Policy Recommendations**

1. Biosolids management should honor the highest and best use hierarchy. The City will strive to treat all wastewater sludge to Class A designation prior to final distribution.



2. Require production of compost that meets or exceeds United States Compost Council Seal of Test Assurance standards.
3. Plastics shall be predominately removed from all final products.
4. Under emergency conditions, land application of unscreened compost, Class A biosolids, or Class B biosolids may be made on a temporary basis.
 - a. Emergency conditions are defined as severe fire risk, other imminent threats to health and safety, or imminent risk of regulatory non-compliance that could not have reasonably been foreseen.
 - b. If time permits, plastics should still be predominately removed before land application.
 - c. Emergency application of these lower quality products shall extend only as long as necessary to alleviate emergency conditions.
5. Austin Water staff shall inform the City Council via a Corrective Action Memo within five business days of declaration of emergency conditions.

6. Austin Water Operations will be conducted in a manner that will keep odors and pests to a minimum.
7. All products produced using biosolids will be clearly labeled to inform the end user of that fact.
8. The Dillo Dirt trademark name and compost quality will remain in City of Austin control, regardless of who produces the product.
9. Austin Water and Austin Resource Recovery should continue to vet and pilot new technologies and management strategies in line with active policies that will improve biosolids handling.
10. Austin Water and Austin Resource Recovery will continue to communicate with other city departments when contracts are being renewed or solicited to ensure any partnering opportunities are explored.
11. Bulking agents should be limited to by-products of other known activities.



**ZERO WASTE ADVISORY COMMISSION RECOMMENDATION
20161012-003a**

Date: October 12, 2016

Subject: Policy Recommendations on Biosolids Management

Motioned By: Hoffman

Seconded By: Masino

Recommendation

A motion was made by Commissioner Hoffman to accept the recommendation as amended, Commissioner Masino second. The motion was unanimously approved 9-0-0-2 with Commissioners Gattuso and Jiampietro absent.

Description of Recommendation to Council

See Attached Policy Recommendation by the Zero Waste Advisory Commission

Rationale:

Recommendation of policy considerations on biosolids management drafted by the Joint Working Group (Water and Wastewater Commission & Zero Waste Advisory Commission) and amended by the Zero Waste Advisory Commission at October 12th regular ZWAC meeting.

Vote: 9-0-0-2

For: Commissioners Acuna, Blaine, Bones, Hoffman, Joyce, Masino, Rojo, Savage, White

Against: 0

Abstain: 0

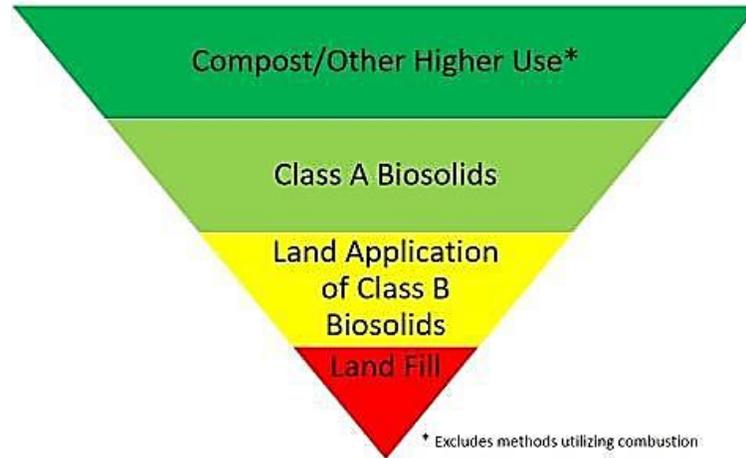
Absent: Commissioners Gattuso and Jiampietro

Attest:

Michael Sullivan, ZWAC staff liaison

Zero Waste Advisory Commission
Biosolids Management Policy Recommendations

1. Biosolids management should honor the highest and best use hierarchy. The City will strive to treat all wastewater sludge to make compost that meets the United States Compost Council's definition of compost prior to final distribution.



2. Require production of compost that meets or exceeds United States Compost Council Seal of Test Assurance (STA) standards. STA samples shall be collected by independent third parties or City staff and tested by an independent third party.
3. Plastics shall be removed from all final products utilizing best management practices.
4. Under emergency conditions, land application of unscreened compost, Class A biosolids, or Class B biosolids may be made on a temporary basis.
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