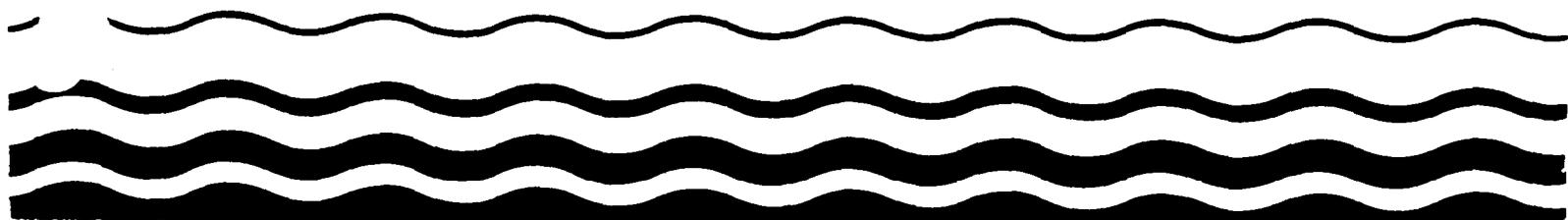

Water

PA

Guidance for Writing Case-by-Case Permit Requirements for Municipal Sewage Sludge

(A COPY OF THIS GUIDANCE IS AVAILABLE
UPON REQUEST)

DRAFT



Foreword

In the Water Quality Act of 1987 ("WQA"), Congress created a new national sludge permitting program that ultimately will implement technical standards for the safe use and disposal of sewage sludge. Congress also emphasized the need to undertake efforts now to protect public health and the environment from sludge use and disposal practices by providing that:

Prior to the promulgation of the [technical sludge regulations], the Administrator shall impose conditions in [NPDES] permits issued to [POTWs] or take such other measures as the Administrator deems appropriate to protect public health and the environment from any adverse effects which may occur from toxic pollutants in sewage sludge.

(WQA, section 406(d)(4), codified at section 405(d)(4) of the Clean Water Act).

The purpose of the Guidance Manual for Writing Interim Case-by-Case Permit Requirements for Municipal Sewage Sludge is to assist permit writers in determining what measures may be necessary to prevent harmful sludge use or disposal practices. It provides information useful for identifying potential problems and for establishing interim sludge conditions for POTW permits. Because some NPDES permit personnel will be setting sludge requirements for the first time, the guidance provides background information on sludge treatment and disposal methods that can affect sludge quality. More importantly, the guidance summarizes existing EPA and State guidance and regulations that apply to sludge use and disposal. It also recommends specific sludge management practices and pollutant limits that permit writers should consider, on a case-by-case basis using best professional judgment, when preparing NPDES permits.

This manual primarily addresses the development of permit conditions that implement the requirements of section 405(d)(4) of the Clean Water Act. Other aspects of the implementation of an interim sludge permitting program, such as EPA/State coordination of interim permitting efforts and use of non-NPDES permits by States for interim sludge permitting, are covered in a separate policy memorandum, which is included as Appendix A to this manual. Information about EPA's long-term plans for the new federal sludge permitting program can be found in the proposed rules for sludge permit and State program requirements, recently published in the Federal Register at 53 Fed. Reg. 7642 (March 9, 1988).

EPA is also developing technical regulations for environmentally safe sludge use and disposal, which will be codified at 40 CFR Part 503. These standards will identify sludge use and disposal options and specify numeric limits and management practices for each option. This manual provides interim guidance for the sludge use and disposal practices that will be covered by the forthcoming technical regulations. It also includes recommendations for practices that will not be covered by the first round of the technical regulations. Therefore, portions of this guidance will continue to be useful even after promulgation of the first round of technical regulations.

We hope that permit writers find this guidance useful in carrying out the interim sludge permitting requirements in section 405(d)(4) of the Clean Water Act. EPA plans to revise this guidance as new information becomes available, encourages users to write to the Permits Division (EN-336) with suggestions for additions and improvements.