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Charles L. Fryxell, Air Pollution Control Officer

July 12, 1999

Todd Thompson  
State Water Resources Control Board, Water Quality Division  
P.O. Box 944213  
Sacramento, CA 94244-2130

Re: General Waste Discharge Requirements for Biosolids Land Application Draft EIR

Dear Mr. Thompson:

The Antelope Valley Air Pollution Control District (AVAPCD) has reviewed the General Waste Discharge Requirements for Biosolids Land Application Statewide Program Draft Environmental Impact Report (EIR). The AVAPCD recommends that the following comment be addressed in the final EIR:

- The General Order discharge prohibitions as reiterated in the executive summary include a requirement that:

"No application or incorporation into the soil is permitted when wind may reasonably be expected to cause airborne particulates to drift from the site."

The air quality impacts section specifies the following requirement as a minimizing factor:

"The release of any visible airborne particulates from the application site during biosolids application or subsequent to spreading onto the soil will be prohibited."

Both prohibitions should be included in the General Order, with some additional language that defines how they will be enforced. AVAPCD suggests specifying a wind gust threshold for application and incorporation, based on the moisture content of the material. AVAPCD also suggests specifying a moisture content minimum that would apply during application and for a number of days after in order to minimize visible particulate release.

Thank you for the opportunity to comment on the General Waste Discharge Requirements for Biosolids Land Application Draft EIR. If you have any questions regarding this letter, please contact Alan De Salvio, Air Quality Engineer, at (760) 245-1661, extension 6122.

Sincerely,

Eldon Heaston  
Deputy Air Pollution Control Officer

Biosolids DEIR.doc

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Governing Board

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## **Responses to Comments from Antelope Valley Air Pollution Control District**

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5-1. See Master Response 9.