

## Andy Peters

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**From:** Andy Peters  
**Sent:** Monday, October 17, 2022 10:39 AM  
**To:** 'pat.heins@state.or.us'  
**Cc:** 'smith@oracwa.org'; Dan Huff; Mac Corthell; Seth Kelly; 'PINNEY Mike \* DEQ'  
**Subject:** Stakeholders of the general biosolids land application permit-- Opportunity to review and comment

Good afternoon Pat, I'm not sure if it's too late to submit comments on this rule-making? If not, please accept these comments from Molalla as a stakeholder. It sounds like everyone is on the right track and Molalla is in support. Good luck with your process this November!

Have a great week,

Respectfully,

### Andy Peters, Public Works Div Manager

315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0220](tel:503.759.0220)

Email – [apeters@cityofmolalla.com](mailto:apeters@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

Comment 1: the City of Molalla agrees that this exception found in the draft should remain in the final versions of the general permit text: “EXCEPTIONS Facilities that do not land apply their biosolids and manage all wastewater solids by either disposal in a permitted landfill or transfer their solids to other permitted facilities for management will not be granted coverage under this general permit. Facilities that fall under this exception may be required in their assigned individual permit for the treatment facility to submit an annual wastewater solids report to DEQ for documentation.”

Comment 2: in Section 4, Land Application, Table A1 under “Soil Rooting Depth and Substratum” it states that sites should have a “minimum rooting depth of 24-inches”. This eliminates all crops normally grown on such land. Example, Maize grows at an average depth of 5.8 inches (14.9 cm) with its absolute deepest root fibers reaching 46.57 inches (118.3cm)\*. The City of Molalla recommends The DEQ should consider adding to the Definitions: “rooting depth (Di) of an individual plant i is the deepest soil depth reached by the roots of an individual plant (i.e. maximum rooting depth) and lateral root spread (Li) as the maximum linear distance (one-sided) from the stem of an individual plant reached by its roots.” Under this definition, the Table A1 text should read “maximum root depth of at least 24-inches”.

Comment 3: Section 2 states that subsamples must be collected from the rooting depth of the crop being grown. The City of Molalla recommends the text specify “the average rooting depth”.

\*source: Field Corp Research Volume 189, 15 March 2016, Pages 68-74, see Table 1. Authors: Jianling Fan, Brian McConkey, Hong Wang, Henry Janzenb. Article available under Creative Commons License, as of 10.10.22 here: <https://www.sciencedirect.com/science/article/pii/S0378429016300399>

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**From:** Susie Smith <[smith@oracwa.org](mailto:smith@oracwa.org)>

**Sent:** Wednesday, September 21, 2022 5:49 PM

**To:** HEINS Pat \* DEQ <[Pat.HEINS@deq.oregon.gov](mailto:Pat.HEINS@deq.oregon.gov)>; MATTHEWS Wym \* ODA <[Wym.MATTHEWS@oda.oregon.gov](mailto:Wym.MATTHEWS@oda.oregon.gov)>

**Subject:** RE: Stakeholders of the general biosolids land application permit

Thanks Pat,

What kind of turn around time do I have to vet this with the B and RW Committee?

Thanks!

*Susie*

Susie Smith

Executive Director

Oregon Association of Clean Water Agencies (ACWA)

(o) 541-485-0165

(c) 541-914-5106

[smith@oracwa.org](mailto:smith@oracwa.org)

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**From:** HEINS Pat \* DEQ <[Pat.HEINS@deq.oregon.gov](mailto:Pat.HEINS@deq.oregon.gov)>

**Sent:** Wednesday, September 21, 2022 5:20 PM

**To:** Susie Smith <[smith@oracwa.org](mailto:smith@oracwa.org)>; MATTHEWS Wym \* ODA <[Wym.MATTHEWS@oda.oregon.gov](mailto:Wym.MATTHEWS@oda.oregon.gov)>

**Subject:** Stakeholders of the general biosolids land application permit

Susie and Wym,

We are moving forward with the development of the general biosolids land application permit. Attached is the latest version of the draft permit for your review and feedback. I am still waiting for response from the other potential reviewers, but do not want to hold this review process up any longer. You are on the first wave of external reviews of this and I would value your thoughts and ideas on this version. I will be sending out an email with proposed dates and meeting times once I finalize the list of primary stakeholder reviewers.

Thank you for your help on this effort!

Patrick (Pat) Heins

*Oregon DEQ*

*State Biosolids & Water Reuse Coordinator*

700 NE Multnomah St., Suite #600

Portland, OR 97232

503-229-5749

## Andy Peters

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**From:** YELTON-BRAM Tiffany \* DEQ <Tiffany.YELTON-BRAM@deq.oregon.gov>  
**Sent:** Friday, October 14, 2022 3:04 PM  
**To:** Andy Peters; PINNEY Mike \* DEQ  
**Cc:** YELTON-BRAM Tiffany  
**Subject:** RE: 5 day followup Aeration Basin Drawdown

Hello Andy

Thank you for this report. I have read through it but will wait for Mike to return and review it before making any comments, if we have any.

Tiffany Yelton Bram (Pronouns : she/her/hers)  
WQ Source Control Manager  
Northwest Regional Office  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Suite #600  
Portland OR 97232

Desk 503 229 5219  
Mobile 503 975 0046

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**From:** Andy Peters <apeters@cityofmolalla.com>  
**Sent:** Friday, October 14, 2022 9:07 AM  
**To:** PINNEY Mike \* DEQ <Mike.PINNEY@deq.oregon.gov>  
**Cc:** YELTON-BRAM Tiffany <Tiffany.YELTON-BRAM@state.or.us>  
**Subject:** 5 day followup Aeration Basin Drawdown

Good Morning Mike, attached is the 5 day followup on the situation with Molalla's Aeration basin. I'm ccing Tiffany also, since I know you are out of town. I'm sure we will touch base by phone next week.?

Thank you,  
Andy

## Andy Peters

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**From:** YELTON-BRAM Tiffany \* DEQ <Tiffany.YELTON-BRAM@deq.oregon.gov>  
**Sent:** Monday, October 10, 2022 7:47 PM  
**To:** Andy Peters  
**Subject:** Re: 5-Day Followup

Thank you for this report.

Sent via the Samsung Galaxy S20 FE 5G, an AT&T 5G smartphone  
Get [Outlook for Android](#)

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**From:** Andy Peters <apeters@cityofmolalla.com>  
**Sent:** Monday, October 10, 2022 5:26:50 PM  
**To:** YELTON-BRAM Tiffany <Tiffany.YELTON-BRAM@state.or.us>  
**Subject:** Fwd: 5-Day Followup

Tiffany, here is that followup we just discussed. Have a good evening!

Andy

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

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**From:** Andy Peters <apeters@cityofmolalla.com>  
**Sent:** Saturday, October 8, 2022 1:07:29 PM  
**To:** PINNEY Mike \* DEQ <Mike.PINNEY@deq.oregon.gov>  
**Cc:** Mac Corthell <mcorthell@cityofmolalla.com>; Dan Huff <dhuff@cityofmolalla.com>  
**Subject:** 5-Day Followup

Mike, Sunday is 5 days from the recycled water spill we reported last week. Attached is our required 5-day written report. I'm sure we will touch base with you next week, let me know if you have any questions. Thanks!

Respectfully,

**Andy Peters, Public Works Div Manager**  
315 Kennel Ave. | PO Box 248 | Molalla, OR 97038

Phone – [503.759.0220](tel:503.759.0220)

Email – [apeters@cityofmolalla.com](mailto:apeters@cityofmolalla.com)

Website – <http://www.cityofmolalla.com>

## Andy Peters

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**From:** Andy Peters  
**Sent:** Monday, October 10, 2022 5:27 PM  
**To:** YELTON-BRAM Tiffany  
**Subject:** Fwd: 5-Day Followup  
**Attachments:** 20221007 To DEQ - 5 day followup Recycled Water Spill.pdf

Tiffany, here is that followup we just discussed. Have a good evening!

Andy

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

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**To:** PINNEY Mike \* DEQ <Mike.PINNEY@deq.oregon.gov>  
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Website – <http://www.cityofmolalla.com>

## **Andy Peters**

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**From:** Andy Peters  
**Sent:** Thursday, November 3, 2022 8:24 AM  
**To:** 'PINNEY Mike \* DEQ'  
**Subject:** FW: 20221028 Aeration Basin Failure  
**Attachments:** 20221102 Aeration Basin Failure.pdf

Good Morning Mike,

Dyer Partnership has completed their review of the AB situation, attached. I'll post this one to our website in the coming days. I'm still digesting it myself.

Andy



## Andy Peters

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**From:** PINNEY Mike \* DEQ <Mike.PINNEY@deq.oregon.gov>  
**Sent:** Monday, October 24, 2022 8:27 AM  
**To:** Andy Peters  
**Cc:** YELTON-BRAM Tiffany  
**Subject:** RE: 5 day followup Aeration Basin Drawdown

Andy,

Received.

I will wait for the Dyer Tech Memo on the ABs fate.

### Michael Pinney PE

Senior Environmental Engineer  
Northwest Region – Source Control  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Suite 600  
Portland OR, 97232  
971-227-1765

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**From:** Andy Peters <apeters@cityofmolalla.com>  
**Sent:** Friday, October 14, 2022 9:07 AM  
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