

BELLEFONTE BOROUGH AUTHORITY

236 West Lamb Street
Bellefonte, PA 16823
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May 5, 2016

Thomas N. Eby, Board Chairman
Benner Township Water Authority
170 Irish Hollow Road
Bellefonte, PA 16823

Re: Land Application of Biosolids in Benner Township

Dear Mr. Eby:

On behalf of the Bellefonte Borough Authority, I thank you for your letter of April 26th. There has been much reported in the newspapers about the biosolids program and Bellefonte's source water plan. I would like to take this opportunity to provide some facts related to both.

Bellefonte's wastewater treatment plant has been land applying biosolids on area farms for more than twenty-five years. There is an extensive application process through the PA Department of Environmental Protection (PA DEP) to get a farm permitted. After a permit is issued, we must comply with all permit regulations. Over the past twenty-five plus years, we have met or exceeded all program requirements. All transportation and land application is handled by trained Plant personnel to ensure everything is done in compliance. Literally, thousands of tons of biosolids have been applied over the years. As far as our records and test results, we have documentation required by PA DEP under the permit and land application process. If someone thinks the regulations are not stringent enough, that issue needs to be taken up with State regulators and legislators.

In regard to Bellefonte's source water plan completed in 2014, we did not violate the Plan. As the owner and permit holder for the Big Spring, we believe in good land use management and regulation. The plan identifies "potential Sources of Contamination (PSOC)". The Plan states: "... land uses, activities, or individual industries identified in the PSOC inventory are not necessarily a source of pollution; however, they have the *potential* for contaminating groundwater." The Plan states that the potential area of contribution to the Big Spring is approximately 55 square miles covering 17 municipalities in two counties. Almost 900 potential sources of contamination were identified in the Plan.

Many activities or uses including agriculture, cemeteries, airport deicing storage tanks, and residential septic systems are listed. None of us would say that these activities should be barred from continuing. The key is management and regulation of all potential sources of contamination. The Source Water Plan provides the following definition of biosolids:

“Biosolids: Biosolids are the nutrient-rich organic materials resulting from the treatment of sewage sludge. Biosolids can be applied to agricultural fields as fertilizer to improve soils and stimulate plant growth. The application of biosolids is regulated by the Commonwealth of Pennsylvania to ensure the material is treated properly and is then safely applied to agricultural areas. Biosolids must meet specific quality criteria before land application. Biosolids, other than landscape-grade, may not be applied to farmland, forests, or mine reclamation sites that are within 100 feet of a stream; within 300 feet of an occupied dwelling or water source; within 11 inches of a seasonal high water table; or within 3.3 feet of the regional groundwater table.”

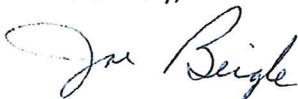
To put things into perspective, as stated above, well water sources have a setback of 300 feet for biosolids. The Big Spring or Zone 1 in the Plan has a proposed setback of 400 feet for potential sources of contamination. It is my understanding that the Grove Park supply well is over 3000 feet away from the edge of the Spicer farm and that 1000 feet of that distance is a wooded area.

You may have read in the newspaper where it was reported that a well was contaminated by biosolids in the 1990s, and that the biosolids possibly came from the Bellefonte Plant. In this incident, it was primarily a liquid-based application of biosolids. Our biosolids are pressed to greatly reduce the amount of liquid in its composition. Lastly, the biosolids did not come from the Bellefonte Plant.

The Bellefonte Wastewater Treatment Plant biosolids land application operation is highly regulated by PA DEP and has been well managed for more than twenty-five years. We have continuously met or exceeded all regulations set forth under the permit to land apply biosolids. We support good management and regulation of all potential sources of contamination in any watershed; especially our own. We are ordinarily open to discussing any differences that may arise and providing information, but the pending Appeal to the Environmental Hearing Board unfortunately complicates this. We are open to looking at alternatives to biosolids land application but this will take time, analysis, financing, etc. I have enclosed some PA DEP fact sheets on biosolids.

Thank you in advance for your interest in working together to resolve these issues

Sincerely,



Joe Beigle, Chair

Bellefonte Borough Authority