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April 21, 2020

Mr. Dennis Fekert, Certification Section Chief  
Solid Waste Management Program  
Waste Management and Prevention Division  
Department of Environmental Conservation  
Davis Building, 1<sup>st</sup> floor  
One National Life Drive  
Montpelier, VT 05602

Re: Comments on Solid Waste Rules

Dear Mr. Fekert,

Thank you for the opportunity to review and comment on the proposed revisions to the Solid Waste Management Rules. The following are general and specific comments from the Village of Essex Junction Wastewater facility.

**6-302** (a) (10) page 31: glycerol exemption. Please consider the addition of municipal anaerobic digesters to this list.

**6-304** Prohibitions (1) page 35: Item (1) may be item (a) by the numbering on the rest of the page. (e) as presented and without a definition for commercial septage appears in conflict with permitted land application sites. Please consider the addition of "permitted" where appropriate for treated septage, etc. or define commercial septage.

**6-703** Table A page 63: Consider the following edit: Minimum distance from waste management boundary to drinking water. ~~source not owned by the applicant.~~

**6-706** (c)(2)(A) Report of Discharge page 67. Please specify a 24-hour phone number or web portal reporting requirements. Differing ANR DEC reporting requirements may be in conflict with reporting criteria presented here.

**6-1302** (b) page 156: Residuals Management Facilities General Exemption 50 lb. bags. The reference noted for regulation of material greater than 50 lb should read 6-13043(a)

**6-1306** (b) Residuals Management Facility Operating Standards page 168: (a) application on.... frozen or snow-covered ground. "Snow Covered" has been broadly interpreted to consider from a dusting of snow to complete cover with snow. This section appears to assume surface application requiring with incorporation to follow. Please consider a revision for direct injection of biosolids when snow is present with ground exposed and soil is not frozen.

Thank you for your consideration.

James L. Jutras  
Water Quality Superintendent  
cc: Evan Teich, Unified Manager  
Greg Duggan, Deputy Manager  
Sarah Macy, Assistant Manager