

#17-26 STONEY CASTLE
Sludge Storage Facility

17/26
STONE CASTLE



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

8787 Georgia Avenue • Silver Spring, Maryland 20910-3760

July 11, 1990

William Chicca
Administrator
Solid Waste Program
Maryland Department of the Environment
2500 Broening Highway
Baltimore, MD 21224

Dear Mr. Chicca,

I am writing in regard to the application filed by Bio Gro Systems, Inc. for a sludge storage facility permit at the Alfred Spates property in Montgomery County. Please accept this letter as my testimony for the public hearing on this case and enter it into the official record.

The Spates Farm has been designated as a historic site on the Montgomery County Master Plan for Historic Preservation. It is my understanding that it has also been determined by the Maryland Historical Trust to be eligible for designation on the National Register of Historic Places. When the property was designated as historic by Montgomery County, an environmental setting was delineated. A map of this setting is attached.

As the Historic Preservation Planner for the Montgomery County Planning Board, I have no objection to the placement of a sludge storage facility on the Spates property - it is not inconsistent with the agricultural uses on the farm. However, I strongly recommend that the sludge facility be located outside of the delineated environmental setting and well away from the historic house and contributing outbuildings.

The Spates Farm - historically, called Stoney Castle - is one of the finest early homes in Montgomery County. It was built in 1831 and is associated with four generations of the White family - among the County's oldest and most historically important. There are a number of outbuildings associated with Stoney Castle which are also historically significant. This property not only derives its historic value as an individual house, but also as an intact collection of farm buildings that represents our County's agricultural heritage.

Thus, the defined environmental setting - which was thoughtfully developed to include the house, the outbuildings, and the drives leading to the property - has a great deal of importance and should not be disturbed by the introduction of a large tank for the storage of sludge.

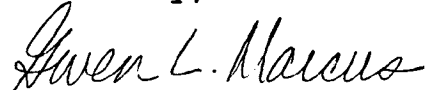
In addition, it is important that the driveways that are located within the environmental setting and which lead to and from the sludge storage facility are not substantially altered. They should retain their rural/farm road character and should not be greatly widened or improved.

To summarize, the proposed sludge storage facility should be located outside of the delineated environmental setting. The operation of this facility must be sensitive to the historic character of the farm - particularly those areas within the environmental setting. Drives and other historic features must not be substantially altered.

It is important to note that any alterations or new construction within the environmental setting must be reviewed and approved by the Montgomery County Historic Preservation Commission before a County building permit for the work can be issued.

Thank you for the opportunity to comment on this project. If you have any questions, please feel free to contact me.

Sincerely,



Gwen L. Marcus
Historic Preservation
Planner

cc: Doug Alexander, Chief, Urban Design
Robert J. Spalding, CPN
Jared Cooper, HPC
Lauren Bowlin, Maryland Historical Trust
Mary Ann Kephart, Historic Medley, Inc.

°398

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375

ROAD

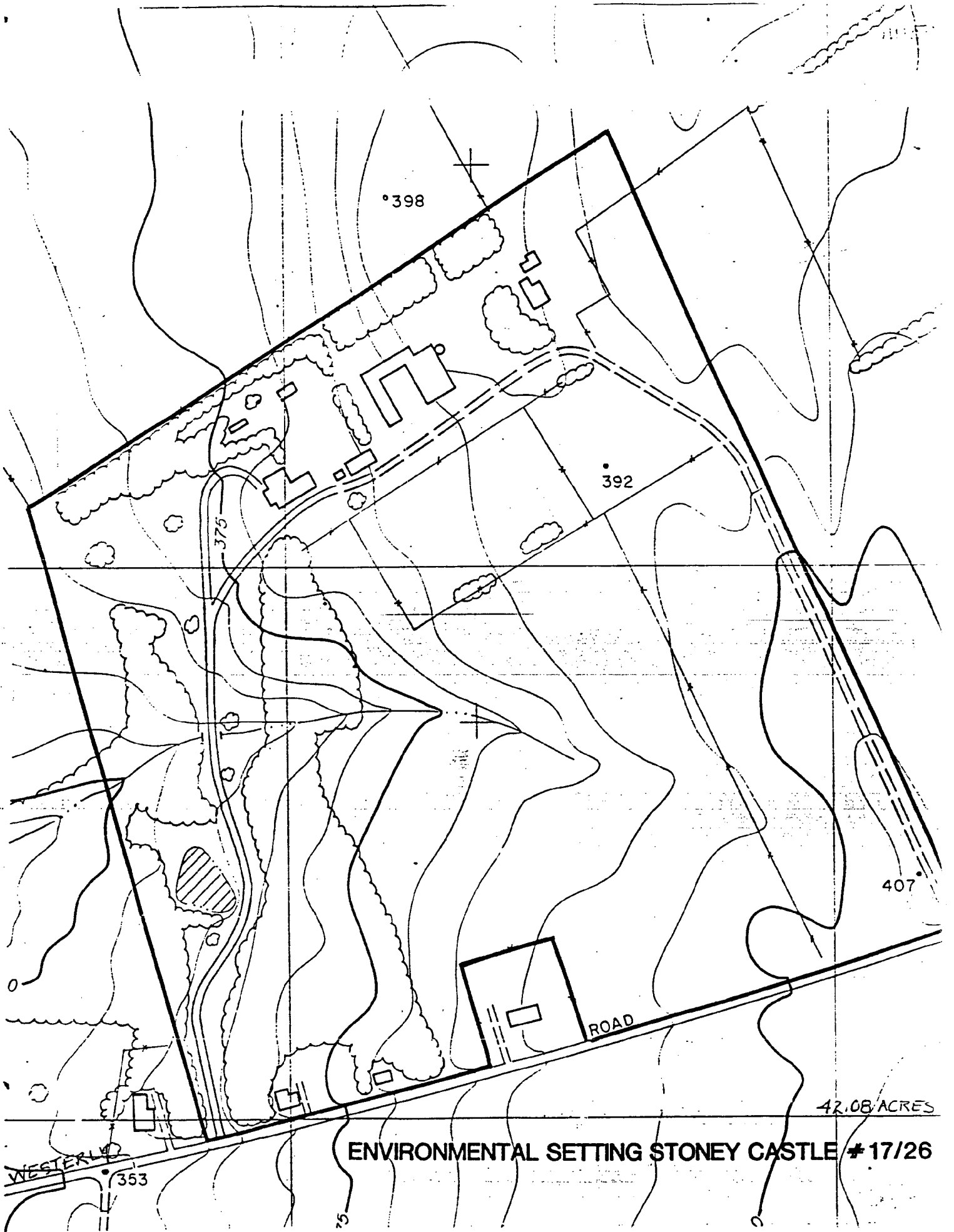
42.08 ACRES

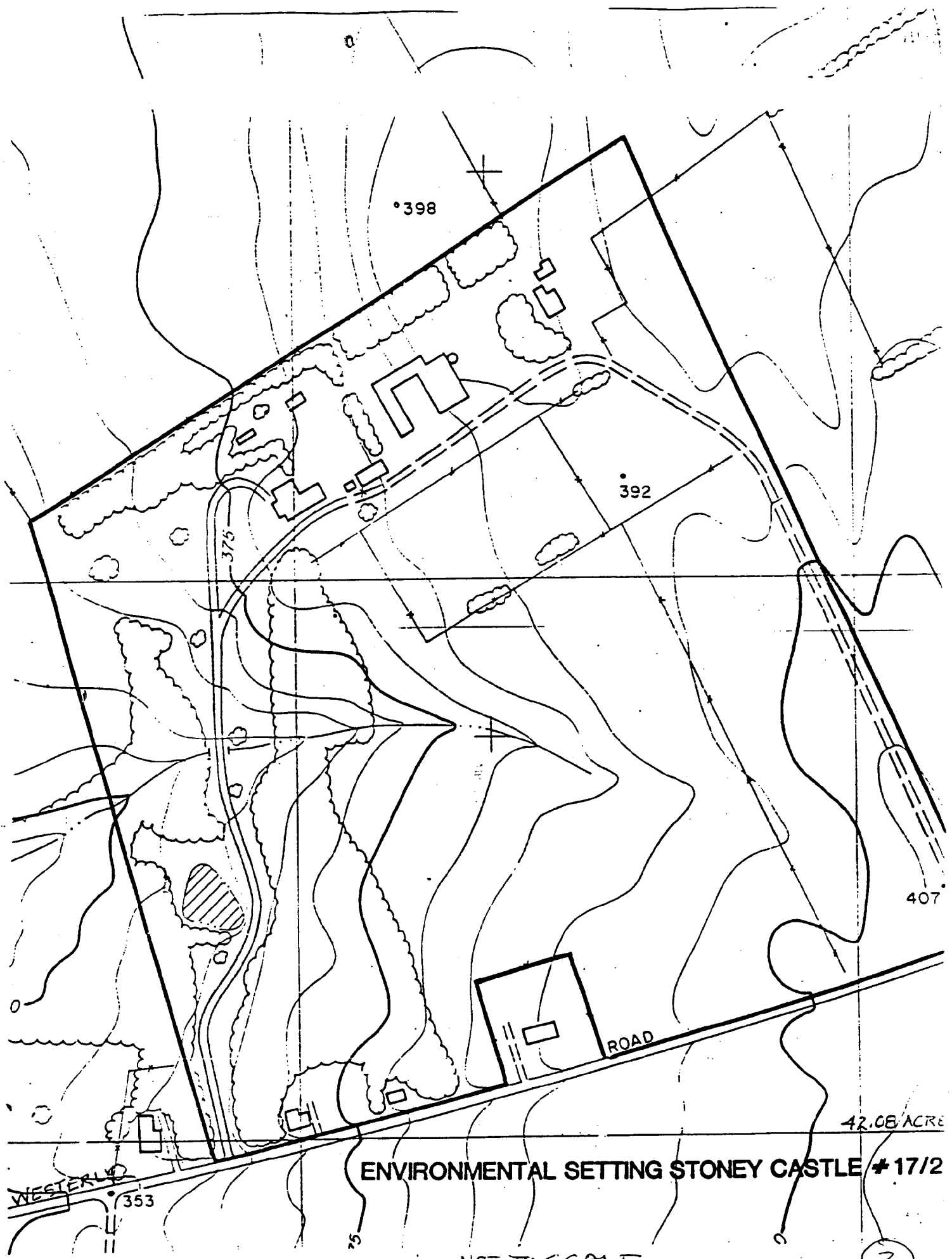
ENVIRONMENTAL SETTING STONEY CASTLE #17/26

353

WESTERLY

75





ENVIRONMENTAL SETTING STONEY CASTLE #17/2

42.08 ACRES

NOT TO SCALE

3

RE: SPATES SLUDGE FACILITY

SEND TESTIMONY IN BEFORE

JULY 13, 1990:

WILLIAM CHICCA

ADMINISTRATOR

SOLID WASTE PROGRAM

MARYLAND DEPT. OF THE

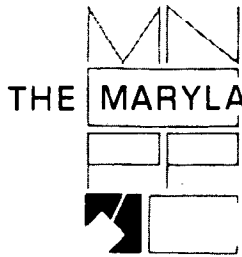
ENVIRONMENT

2500 BROENING HIGHWAY

BALTIMORE, MD. 21224

Call if you have questions!

Given



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

8787 Georgia Avenue • Silver Spring, Maryland 20910-3760

June 22, 1990

TO: Jared Cooper, Historic Preservation Specialist, HPC
Gwen Marcus, Historic Preservation Planner, M-NCPPC

VIA: John Matthias, Acting Chief
Community Planning North Division *John Matthias*

FROM: Robert J. Spalding, Principal Planner *Robert J. Spalding*

SUBJECT: Spates Farm Sludge Storage Application

Introduction

An application for a permanent 500,000 gallon open air sludge storage facility has been filed with the State Department of the Environment for the Spates Farm in Poolesville. The location plan indicates that part of the project site lies within the environmental setting of the Stoney Castle Historic Site. Therefore, any alterations which require a building permit are subject to Historic Preservation Commission (HPC) review. The following information is provided for your consideration:

The site is zoned Rural Density Transfer (RDT). The RDT Zone explicitly encourages agricultural uses. The storage of sludge for agricultural application is interpreted to be an accessory building or use to the primary agricultural use. Therefore, a Sludge Storage Facility for on-site application would be permitted in the RDT Zone.

Although permitted in the RDT Zone, staff notes that the compatibility of the facility's location and access with the Stoney Castle historic resource must be determined.

Concerns

First, the plan is unclear on the exact location of the improvements in relation to the environmental setting. Second, the location and character of the security fence is not indicated. Third, the site may require stormwater management measures which are not indicated on the plan. Fourth, the access road to be used by the trucks is unpaved with no paving recommended. Fifth, access to the site is by Westerly Road which has only a 15-16 foot-wide paved area, and sixth, the Town of Pooles-

ville and its residents have expressed concerns over the compatibility and safety of the storage tank.

The applicant should submit plans with the detail required to evaluate the impact of the improvements and screening. Storm-water management facilities, if required, should be located outside of the environmental setting. The access road, which is in the environmental setting, will be serving a permanent facility with heavy truck traffic. Typically, the access road should be paved to appropriate standards. However, the historic character may make this undesirable. Therefore, the use of an access route which is paved and outside the environmental setting should be explored. Westerly Road is a 16-foot-wide road which was paved over a "milk road" which typically had a 9-foot-wide concrete mainline and 3-foot slag shoulders on each side. The current road conditions require cars to slow down and pull over slightly to allow for comfortable passing of on-coming cars. On-coming trucks cause even more disruption. The Town of Poolesville shares this concern.

The Town of Poolesville testimony expressed concerns about groundwater impacts from a leak in the storage tank. The site is within one mile of an existing municipal well and within the well's cone of depression. The entire water supply for the Town of Poolesville is from the Piedmont Sole Source Aquifer which covers a large portion of western and northern Montgomery County. The geology of the area is such that contamination of the aquifer can affect a large land area. The Town and staff are concerned that any leaks into the groundwater supply could result in contamination. Contamination could lead to health problems which would be resolved by the extension of public water at a very high cost.

An additional concern raised by the Town is that of odor. Portions of the Town lie downwind of the proposed open air tank. Residents have expressed skepticism over the applicant's claim that the odor can be controlled. While not taking a position on the potential odor, staff notes that other agricultural uses do produce odors of a sufficient magnitude to generate complaints from nearby developed areas. The County has traditionally attempted to provide adequate buffers, such as parks or low density housing to minimize conflicts between developed and agricultural areas. The Functional Master Plan for Agricultural Preservation recognized the importance of the Piedmont Sole Source Aquifer and encouraged its protection. The Plan also recognized the value of sludge in agricultural production but does not specifically address sludge storage facilities.

The public hearing record will remain open until the close of business on July 13. As explained by representatives of the State Department of the Environment, the record of the public hearing is used to determine whether any conditions should be placed on operations, rather than approval or denial. A recommendation for denial can be based on incomplete application, failure to pay fees, or a demonstrated record of non-compliance.

Attachments

SLUDGE MEMO
ATTACHMENTS (8)

FACT SHEET

Proposed Storage Facility - Spates Farm

One Mast-Lepley concrete storage facility would be constructed on the Spates farm to provide storage of the Seneca and Damascus Wastewater Treatment Plant sludges, when site conditions do not permit the direct application of sludges.

Sludge Production

- . Seneca WWTP 720 dry tons/year
- . Damascus WWTP 144 dry tons/year

- . TOTAL 864 dry tons/year

Contract Storage Requirement

- . 150 dry tons/year = storage for 90 days sludge production

Proposed Facility Storage Capacity

- . 200 dry tons (with 12" freeboard)
- . Dimensions = 90' in diameter, 12' deep

Utilization of Stored Sludge

- . The stored sludge will be land applied at agricultural rates to the Spates farm and possibly other permitted farms. The average corn application rate for these sludges is 2.7 dry tons/acre. If the maximum quantity of sludge was stored, approximately 75 acres would be utilized in cleaning out the storage facility. We currently have 413 acres permitted for land application in Montgomery County. Since a majority of the sludge will be stored in the winter months, Bio Gro anticipates cleaning out the facility once a year in the spring.

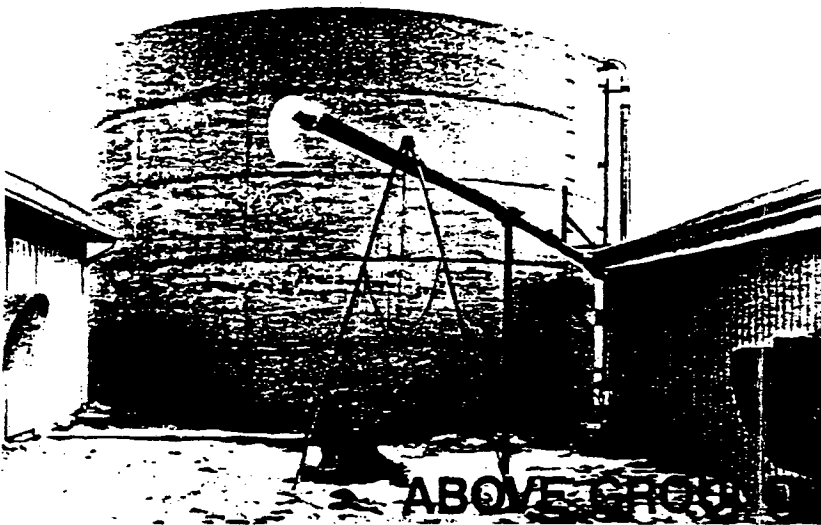
Transportation

- . Sludge will be transported by totally enclosed and sealed tanker trucks. Truck traffic to the facility would average one to two trucks per day during periods of storage.



Sludge Management · Specializing in Beneficial Use

PROPOSED FACILITY



Satisfied Customers

Bauman Brothers - Sterling, Ohio
Crestland Farms - Sterling, Ohio
Golden Eggs, Inc. - Smithville, Ohio
Harley Heffelfinger - Loudonville, Ohio
Horst Farms - Sterling, Ohio
Myron Ramseyer - Sterling, Ohio
Steiner Farm - Seville, Ohio
Jim Winkler - Sterling, Ohio

★ *Soil Conservation Service Approved*

★ **MAST-LEPLEY SILO, Inc.**

1088 N. Apple Creek Rd., Wooster, Ohio 44691
(216) 264-9292

U.S. DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE COLLIER HILL, MONTGOMERY	SLY FENCE	WORKING DRAWING 02-1
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LOCATION PLAN

1" = 600'

ENGINEERING ASSOCIATES INC. AND SURVEYORS 7000 WISCONSIN AVENUE SUITE 207 WASHINGTON, D.C. 20007	DRAWING NO.
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TITLE

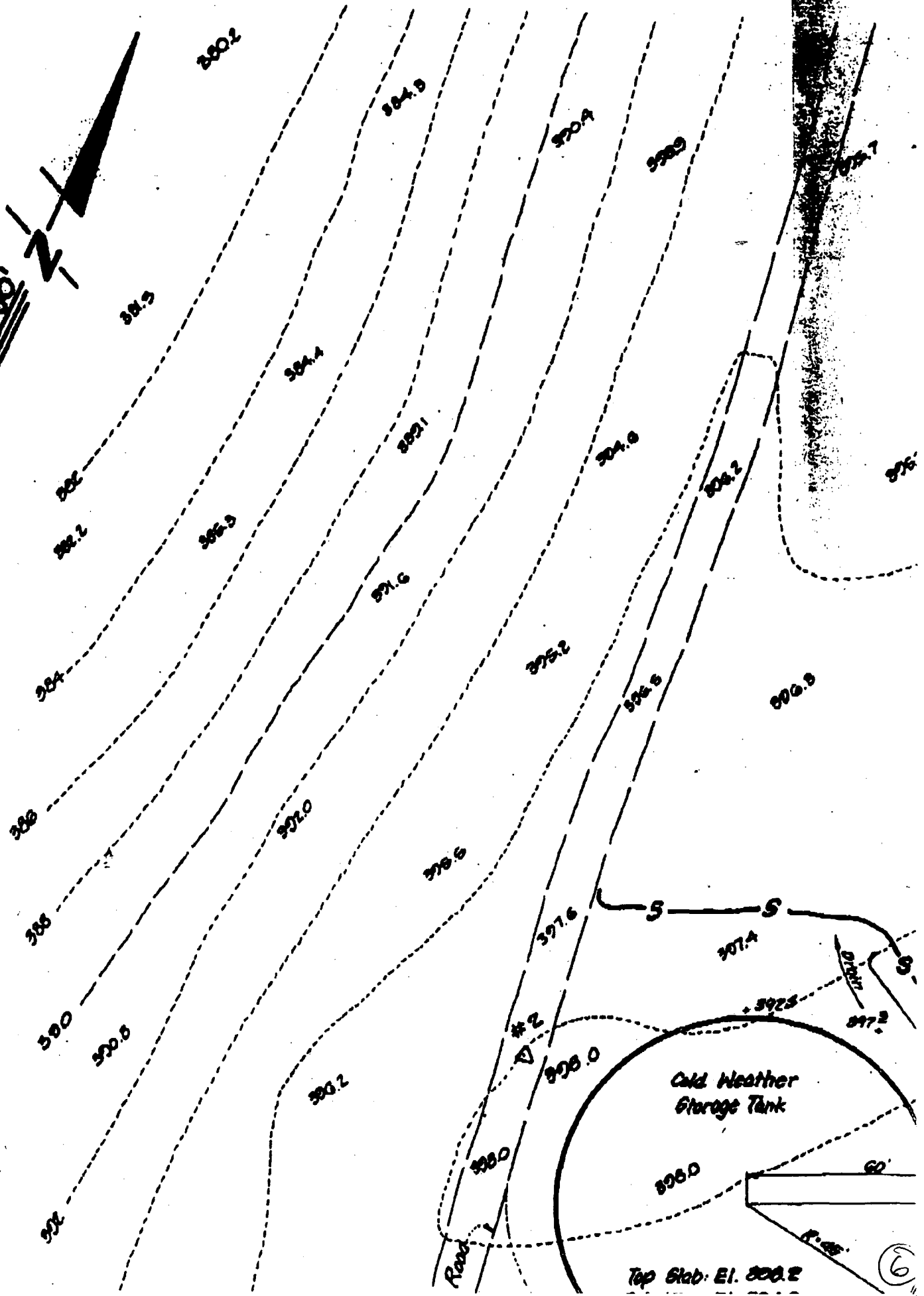
SITE PLAN

FOR LAND APPLICATION OF SLUDGE TO THE PROPERTY OF

ALFRED W. SPATES, et al.

LIBER 4661 AT FOLIO 810 of 809
 THIRD ELECTION DISTRICT
 MONTGOMERY COUNTY, MARYLAND

SCALE: 1" = 20'



6

Planning Board Staff Public Hearing Testimony
Spates Farm Sludge Storage Application

June 13, 1990

GOOD EVENING, FOR THE RECORD MY NAME IS ROBERT SPALDING. I AM REPRESENTING THE MONTGOMERY COUNTY PLANNING DEPARTMENT STAFF.

THE PLANNING DEPARTMENT STAFF HAS CONCERNS REGARDING THE IMPACT OF THE PROPOSED SLUDGE STORAGE FACILITY ON THE SPATES FARM IN POOLESVILLE. THE STONEY CASTLE AND ITS 42 ACRE ENVIRONMENTAL SETTING IS DESIGNATED ON THE MONTGOMERY COUNTY MASTER PLAN OF HISTORIC PLACES. THE STONEY CASTLE IS THE 1831 HOUSE LOCATED ON THE SPATES FARM.

THE PROJECT SITE BOUNDARY SHOWN ON THE LOCATION PLAN OVERLAPS A PORTION OF THE "ENVIRONMENTAL SETTING" OF THE STONEY CASTLE SITE. IT IS ALSO NOTED THAT ACCESS TO THE SITE IS THROUGH THE ENVIRONMENTAL SETTING. AS SUCH, APPROVAL BY THE HISTORIC PRESERVATION COMMISSION (HPC) IS REQUIRED FOR IMPROVEMENTS WITHIN THE ENVIRONMENTAL SETTING. AT THIS POINT, APPROVAL FROM THE HISTORIC PRESERVATION COMMISSION HAS NOT BEEN SOUGHT.

IT IS THE OPINION OF THE STAFF THAT, STATE APPROVAL OF THE SLUDGE STORAGE APPLICATION WOULD BE PREMATURE WITHOUT THE APPROVAL OF THE HISTORIC PRESERVATION COMMISSION. THEREFORE, WE REQUEST THAT THE RECORD BE HELD OPEN UNTIL SUCH APPROVAL IS RECEIVED. IF THE STATE SEEKS TO APPROVE THE REQUEST PRIOR TO HPC

APPROVAL, THE RECORD SHOULD BE HELD OPEN FOR 30 DAYS SO THAT THE HPC CAN COMMENT ON THE APPLICATION.

IN ADDITION TO THESE COMMENTS, THE STAFF WILL SUBMIT ADDITIONAL TESTIMONY TO THE HEARING EXAMINER IN WRITING.

6.14.90

GWEN:

THE PUBLIC RECORD FOR THE SPATES FARM SLUDGE STORAGE APPLICATION WILL CLOSE ON JULY 13.

I WILL PREPARE A MEMO TO YOU ON THE APPLICATION FOR TRANSMITTAL TO THE HPC, SO THAT THE HPC'S COMMENTS CAN BE INCLUDED IN THE RECORD.

I WILL BE OUT ON FRIDAY. IF YOU NEED TO LOOK AT THE FILE IT IS ON MY DESK.

BOB

Bill Pensik } called
(301) 974-5007 } 6/21

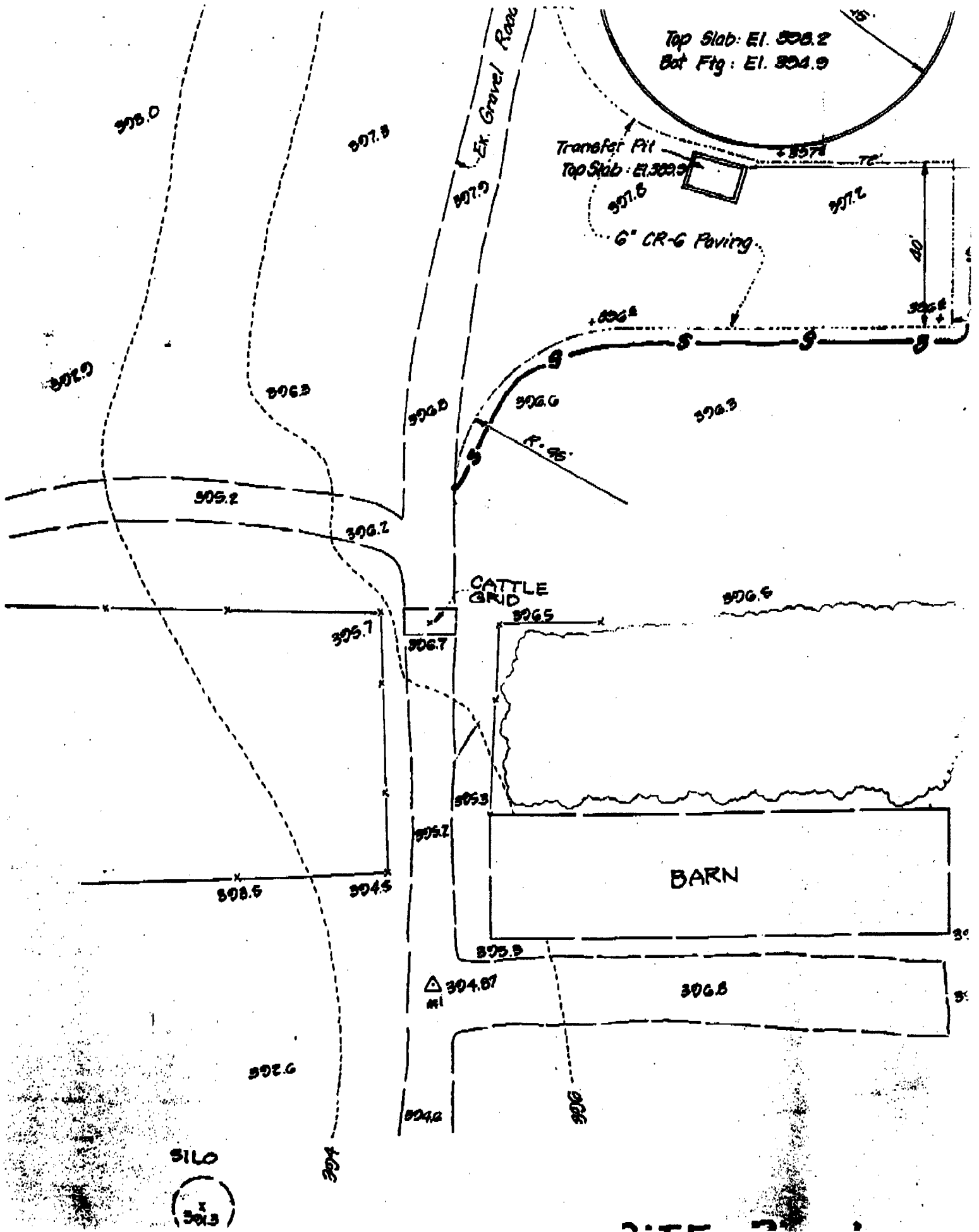
Boeth Cole - MHT has not reviewed

U.S. DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE COLLEGE PARK, MONTGOMERY	SLY FENCE	WORKING DRAWING 00-0
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LOCATION PLAN
 1" = 600'

ENGINEERING ASSOCIATES INC. AND SURVEYORS TREE BUILDING 10772 0	TITLE SITE PLAN
DRAWING NO.	FOR LAND APPLICATION OF SLUDGE TO THE PROPERTY OF ALFRED W. SPATES, et al. LIBER 4681 AT FOLIO 810 of 809. THIRD ELECTION DISTRICT MONTGOMERY COUNTY, MARYLAND





Sludge Disposal • Specializing in Land Application

March 28, 1990

RECEIVED

APR 3 1990

SEWAGE SLUDGE
PERMITTING DIVISION

Mr. Mike Stricker
Department of the Environment
Point Breeze Business Park
2500 Broening Highway
Baltimore, MD 21224

Dear Mr. Stricker:

In reference to the additional information requested by your office regarding our request for a storage facility permit at the Alfred Spates property (MT-4) in Montgomery County, I hereby submit the following information:

1. The Landowner Consent form previously omitted is enclosed noting that both Mr. and Mrs. Spates have agreed to the storage of sludge on the property.
2. The lack of a key designating the flood plain is due to the site not being located within a flood plain.
3. The design volume calculations as noted in the cover letter of 522,490 gallons is based on a 12" freeboard. We are proposing a freeboard of 8" which allows for the storage of 536,709 gallons. Contract specifications call for a minimum of 1,800 wet tons storage capacity, therefore, a tank capacity of 536,709 would be approximately 2,394 wet tons. Bio Gro intends to store only what sludge may not be land applied due to poor weather and or soil conditions.
4. The sludges generated at the Seneca and Damascus plants are aerobically digested and dewatered. Total production at the Seneca and Damascus plants is 500 wet tons per month and 100 wet tons/month respectively.

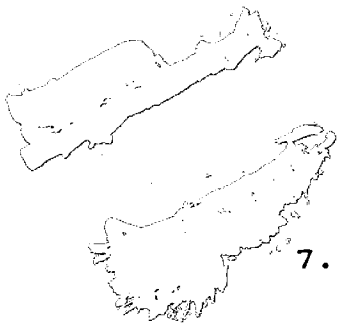
5. The reception pit in the drawings is somewhat more complicated than actually constructed. All the equipment depicted will not pertain to our needs (pumping systems, valves, lines, etc.).

Actual construction would involve the same dimension pit built tangent to the tank and only slightly above grade. The top of the pit will have a grate to prevent accidental entrance yet allows sludge to be dumped through. Inside the pit a submersible pump will be installed connected to an upright pipe permanently fixed to the outside tank wall.

This pipe will be fitted with an elbow to direct sludge into the tank. By not allowing the pipe to go below the level of sludge in the tank, no siphoning back to the reception pit could occur.


Additional equipment installed on the tank would be a ladder of the type to prevent access by children or unauthorized parties. Use of the ladder will be for the purpose of inspection of freeboard levels after rainfall or during loading operation at the facility.

6. Trucks will unload from a valve into a reception pit adjacent to the storage facility. Any sludge remaining on the rear of the vehicle will be scraped off and/or washed off with water provided on-site by a water truck or stationary tank. The wash water used will flow into the reception pit and thereby stored with the sludge at the facility. Any dragout of mud from the area will be prevented by maintaining the road and unloading area with adequate stone to create a clean, all weather roadway.



7. The concrete to be used in construction will be a six bag mix with a maximum load of 4,000 PSI.


I trust the above information addresses the concerns with our submittal. As we discussed, it is our intention only to build this facility if we are successful with our proposal to provide our services for this project. We therefore do not wish to construct at this time but instead need to demonstrate that the site and concept are acceptable from an environmental standpoint.



When the time comes to actually construct the facility engineered drawings on both the tank/reception pit and surrounding area such as unloading pad, driveway, etc. will be forwarded to your office for final approval prior to construction.

Your prompt attention to this submittal would be greatly appreciated since time is of the essence. Should you have any additional questions, please feel free to contact this office.

Sincerely,



Stephen R. Toft
Technical Services
Administrator

mlt.045.ST

cc: Brian Fitzek, Pam Racey, Mike Realo, Cal Schiemann, Bio Gro
Systems, Inc.

MARYLAND STATE DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION
SEWAGE SLUDGE PERMITTING DIVISION

OWNER'S CONSENT FORM
(AGRICULTURAL LAND)

Property Name: Stoney Castle Farm
Property Address: 21111 WILSTERCY Rd
Poolesville MD 20837
Owner's Name(s): Alfred + Marie Spates
Owner's Address: same

I (we), owner(s) of this property do hereby approve the land application of and/or storage of sewage sludge from Damascus + Seneca

Wastewater Treatment Plant(s) on this property and agree to abide by the following conditions:

1. The soil pH will be adjusted to a minimum of 6.5 at the time of sludge application and will be maintained at a minimum of 6.2 for the life of the permit.
2. Animals will not be allowed on sludged fields to graze for at least 30 days after the application of sewage sludge.
3. Public access must be controlled from the site for a minimum of 12 months following the application of sewage sludge.
4. Food chain crops intended for direct human consumption will not be grown for a period of 3 years after the application of sewage sludge.
5. Tobacco is a leafy crop which is grown under acidic soil conditions. Under these conditions heavy metals (cadmium in particular) migrate more readily from the root zone in the soil to the tobacco leaf. Since smokers already intake cadmium from tobacco smoke, the use of sewage sludge containing heavy metals to grow tobacco may increase the levels of cadmium which may accumulate in the body to levels which could be harmful to human health. For this reason sewage sludge which contains significant amounts of cadmium should not be applied to land where tobacco will be grown. Therefore tobacco will not be grown on those areas where sewage sludge is to be applied.

I (we), furthermore agree to abide by the provisions of the Sewage Sludge Utilization Permit issued for this property.

Alfred M. Spates
Marie Renee Spates
Signature(s)

1/22/90
Date



DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway, Baltimore, Maryland 21224
Area Code 301 • 631- 3375

William Donald Schaefer
Governor

Martin W. Walsh, Jr.
Secretary

April 9, 1990

Mr. Michael A. Realo
Bio Gro Systems, Inc.
1916 Forest Drive
Annapolis, Maryland 21401

Dear Mr. Realo:

The Sewage Sludge Division has received and reviewed your permit application for a permanent storage facility on the Alfred Spates farm in Montgomery County, Maryland. A site inspection was held on March 22, 1990. The following information was either not included in the package or must be improved and resubmitted:

1. A written permission from landowner must be submitted (copy enclosed).
2. The site specific topographic map is inadequate. It must be drawn to scale and show details of the facility and surrounding area.
3. The tax map shows the owner as M. Spates, not Alfred Spates as is listed on the application.
4. The frequency of flooding plan is unclear. Some explanation or key must be provided.
5. The well location map and submitted topographic map disagree as to the number of wells on the property. Please submit any well drillers reports or other groundwater information available for these wells.
6. The amount of sludge to be stored is unclear. Please estimate the maximum amount over the period of time to be stored.
7. The capacity of the facility is stated as 522,490 gallons in the cover letter and 572,490 gallons in the operations plan. Please correct or explain this discrepancy. In addition, the freeboard must include expected rainfall capacity as well as the 25 year, 24 hour storm. Please calculate and show these figures.

Mr. Michael Realo
Page Two

8. More information is needed concerning the unloading sump and any water mixing facility. These aspects must also be shown on the plan mentioned in item 2.
9. The operations plan needs to have further detail, such as haul route, method of keeping track of freeboard, explanation of what will be done with sludge if leaks develop while tank is full and must be repaired in winter months, and reinforcement of existing on-site roads for the truck traffic. Also needed are the procedure and materials to be used to repair cracks or other damage.
10. A description of the truck cleaning facility is required. This too must be included in the plan from item 2.
11. Since this is a manufactured facility, information is needed on the concrete to be employed, structural capacity, maximum load, restrictions on use, dimensions of the tank, and installation or construction procedures.

These items are needed for further permit consideration. Should you have any questions please contact me at the above number.

Sincerely,



Michael Stricker, Public Health Engineer
Sewage Sludge Division

MS:nh

Enclosure

cc: Mr. Ronald Nelson
Mr. William E. Chicca
Mr. Edward U. Graham
Mr. Douglas C. Proctor
Mr. Barry Schmidt

LAND APPLICATION OF SLUDGE

ALFRED SPATES

MT 4 STORAGE

MONTGOMERY COUNTY

MARYLAND

FEBRUARY 1990



Sludge Management • Specializing in Beneficial Use

February 16, 1990

Mr. Doug Proctor, Acting Chief
Sewage Sludge Permitting Division
Department of the Environment
Point Breeze Business Park
2500 Broening Highway
Baltimore, MD 21224

Dear Mr. Proctor:

Bio Gro Systems, Inc. is requesting a permit to allow construction of an above ground concrete storage facility with a design capacity of 522,490 gallons. The storage facility will be constructed on the Alfred Spates farm in Poolesville, Maryland (Montgomery County) and will be used for the Seneca and Damascus land application projects.

It is not our intent to construct the storage facility at this time. However, because of the lead time required to obtain all the approvals for storage, it is prudent to obtain the necessary permits which will allow Bio Gro to bid competitively on the Seneca and Damascus projects.

Enclosed is a permit application package detailing this request and a check for \$350.00. If implemented, this storage will provide additional flexibility to our sludge utilization program while maximizing sludge fertilizer use on the Spates Farm.

If you have any questions or required additional information, please call me at 841-5244.

Sincerely,

Michael A. Realo
Senior Project Agronomist

MAR:mlt
Enclosures

5. LOCATION OF SLUDGE UTILIZATION OR DISPOSAL SITE: SEE ATTACHED MAPS.

6. BRIEF DESCRIPTION OF PROJECT: SEE OPERATIONS PLAN ATTACHED.

AS A CONDITION OF ISSUANCE OF THIS PERMIT, I, THE APPLICANT, OR HIS DULY AUTHORIZED REPRESENTATIVES, AGREE TO COMPLY WITH THE PROVISIONS OF THE ENVIRONMENT ARTICLE 9, SECTIONS 230 thru 249 and 269 thru 270 ANNOTATED CODE OF MARYLAND AND COMAR 26.04.06, AND VERIFY THAT THE INFORMATION ON THIS FORM IS CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

MICHAEL A. REALO
NAME (PRINT)

SENIOR PROJECT AGRONOMIST
TITLE

Michael A. Realo
SIGNATURE

BIO GRO SYSTEMS, INC.
EMPLOYER

301/ 263-2237
TELEPHONE NO.

Feb 5, 1990
DATE

A COMPLETE APPLICATION SHALL CONSIST OF THIS SIGNED AND FILLED OUT FORM PLUS ALL OF THE INFORMATION REQUIRED IN COMAR 26.04.06 FOR THE PROJECT TYPE CHECKED IN ITEM #4, ABOVE. FIVE COPIES OF THE COMPLETE APPLICATION MUST BE PROVIDED TO THE DEPARTMENT ALONG WITH THE APPROPRIATE APPLICATION FEE PAYABLE TO: SEWAGE SLUDGE UTILIZATION FUND AND FORWARDED TO:

MARYLAND DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
SEWAGE SLUDGE DIVISION
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224

NOTE: DO NOT SUBMIT THE PERMIT FEE WITH THE APPLICATION. AFTER A PRELIMINARY REVIEW AN INVOICE FOR THE CORRECT FEE WILL BE SENT TO THE PERMIT APPLICANT. THIS FEE MUST BE PAID PRIOR TO PERMIT ISSUANCE.

nh:2/89
DENV119

OPERATIONAL PLAN

BIO GRO SYSTEMS, INC.

- A. TYPE OF EQUIPMENT
- B. TYPE OF SEALS ON SLUDGE TRANSPORTATION VEHICLES
- C. DAYS AND HOURS OF OPERATION
- D. TRUCK CLEANING FACILITIES
- E. PROCEDURES FOR SPREADING AND INCORPORATION
- F. SPILL CONTROL AND REPORTING
- G. RECORD-KEEPING
- H. FUTURE USE OF SITE
- I. TRANSPORTATION ROUTE

PROJECT DESIGN

A. TYPE OF EQUIPMENT

SLUDGE WILL BE TRANSPORTED FROM THE WASTEWATER TREATMENT FACILITIES IN SEALED, WATERTIGHT UNITS TO APPROVED AND APPLICATION SITES. THE TRANSPORT TRUCKS WILL DELIVER THE SLUDGE TO HIGH FLOTATION LAND-APPLICATION VEHICLES STATIONED ON THE FIELD RECEIVING SLUDGE. THE SLUDGE TRANSFER WILL BE THROUGH A SUCTION HOSE AND THE LAND-APPLICATION VEHICLE WILL PERFORM ALL SLUDGE DISTRIBUTION.

A SUMMARY OF EQUIPMENT TO BE EMPLOYED ON THE PROJECT IS AS FOLLOWS:

1. SIX TO FIFTEEN TRUCK UNITS. THE NUMBER WILL VARY DEPENDING ON PLANT PRODUCTION TRAVEL TIME TO LAND APPLICATION SITES.
2. ONE TO THREE HIGH FLOTATION LAND -APPLICATION VEHICLES OF 2,000-TO-4,000 GALLON CAPACITY. THE NUMBER WILL VARY DEPENDING ON THE CONFIGURATION OF LAND -APPLICATION SITES AS IT AFFECTS APPLICATION TIME EFFICIENCY.
3. IF CAKE OPERATIONS ARE CONDUCTED, THEN:
 - * ONE TO TWO RUBBER TIRED FRONT-END LOADERS.
 - * ONE TO TWO CAKE SPREADERS WITH 10-14 WET TONS CAPACITY. THE NUMBER WILL VARY DEPENDING ON THE CONFIGURATION OF THE LAND APPLICATION SITES AS IT AFFECTS APPLICATION TIME EFFICIENCY. THE CAKE SPREADER BOXES WILL EITHER BE A TYPE WHICH CAN BE PULLED BEHIND A TRACTOR OR THE BOX WILL BE MOUNTED ON THE FRAME OF A HIGH FLOTATION VEHICLE.
 - * CAKE APPLIED SLUDGE WILL BE INCORPORATED BY THE END OF EACH DAY.
4. THE TRUCK UNITS WILL BE INSPECTED, LICENSED AND APPROPRIATELY MARKED AS REQUIRED FOR THE PURPOSE OF TRANSPORTING THE SLUDGE MATERIAL.
5. SLUDGE WILL BE TRANSPORTED IN TRAILERS SUFFICIENTLY TIGHT SO AS TO PREVENT ANY LEAKAGE OF SLUDGE. EACH TRUCK WILL HAVE THE SEWAGE SLUDGE PERMIT NUMBER AVAILABLE IN THE CAB.

B. TYPES OF SEALS ON SLUDGE TRANSPORT VEHICLES

SLUDGE IS TRANSPORTED IN STANDARD 6,500 GALLON TANKER TRUCKS, PNEUMATIC CEMENT TRAILERS, DUMP TRUCKS, DUMP TRUCKS SEALED FOR LIQUID OPERATIONS AND/ OR CONCRETE TRUCKS, ALL WITH MECHANICAL SEALS AND/OR WING LOCKS ON PORTS OR OPENINGS. ALL TRUCKS ARE REGULARLY INSPECTED TO ASSURE WATER TIGHTNESS.



C. DAYS AND HOURS OF OPERATION

NORMAL FIELD OPERATIONS ARE 6:00 AM TO 5:00 PM MONDAY THROUGH SATURDAY; HOWEVER, THERE ARE SITUATIONS DUE TO SLUDGE PRODUCTION, WEATHER CONDITIONS, OR UNFORESEEN OCCURRENCES IN THE FIELD WHERE OTHER THAN NORMAL HOURS OF OPERATION WILL TAKE PLACE.

D. TRUCK CLEANING FACILITIES

AT EACH OF THE WASTEWATER TREATMENT FACILITIES, THERE ARE TRUCK WASHING FACILITIES NEAR SLUDGE PROCESSING BUILDINGS. ONCE THE SLUDGE LEAVES THE WWTP, IT IS TRANSPORTED IN SEALED UNITS AND THEN LOADED INTO THE TERRA-GATOR. WHAT LITTLE, IF ANY, SLUDGE THAT MAY BE LEFT AT THE COUPLING FROM THE TRUCK TO THE TERRA-GATOR IS CLEANED AT THE APPLICATION SITE BY THE TRUCK DRIVER.

IF NECESSARY, TRUCKS WILL BE CLEANED ON-SITE TO PREVENT DRAG-OUT OF DIRT OR SLUDGE ONTO COUNTY ROADS. IN THE EVENT DIRT OR SLUDGE IS TRACKED OUT ONTO THE ROADS, CLEAN-UP ACTIVITIES WILL BE INITIATED IMMEDIATELY.

E. PROCEDURES FOR SPREADING AND INCORPORATING

1. SUBSURFACE INJECTION WILL EMPLOYED.
2. THE AMOUNT OF SLUDGE APPLIED WILL BE LIMITED TO THE ANNUAL ALLOWABLE DRY TONS PER ACRE AS DETERMINED BY THE STATE PERMIT.
3. THE SURFACE OR SUBSURFACE APPLICATION OF SEWAGE SLUDGE WILL BE ACCOMPLISHED IN AN EVEN, CONTINUOUS MANNER AVOIDING SWALES, GULLIES, PONDING WATER, AND WATER CHANNELS.
4. IF SLUDGE IS BEING APPLIED BY SUBSURFACE INJECTION, A MINIMUM OF 99.5 PERCENT SUBSURFACE INJECTED SLUDGE WILL BE COVERED WITH SOIL BY THE END OF EACH WORKING DAY. WHEN WEATHER AND/ OR SOIL CONDITIONS PREVENT, ADHERENCE TO THIS SLUDGE APPLICATION PROCEDURE, SLUDGE WILL NOT BE APPLIED ON THE SITE.
5. UNLESS APPROVED BY THE DEPARTMENT, THERE WILL BE NO STORAGE OR STOCKPILING OF SEWAGE SLUDGE AT THIS SITE.
6. BUFFER ZONES WILL BE ESTABLISHED AND MAINTAINED IN ACCORDANCE WITH COMAR 10.17.10.09.A "BUFFER ZONES" WITH THE FOLLOWING EXCEPTION: IF ADJACENT PROPERTY OWNERS WHO ARE AFFECTED BY THE BUFFER ZONES THAT APPLY TO PROPERTY LINES ONLY GIVE WRITTEN CONSENT TO THE PERMITTEE THAT HE CAN DEPOSIT SLUDGE TO THE PROPERTY LINE, THE REQUIREMENT THAT THE PERMITTEE OBSERVE BUFFER ZONES PERTAINING TO PROPERTY LINES IS WAIVED TO THE EXTENT THAT CONSENT BY THE ADJACENT PROPERTY OWNERS IS GRANTED.
7. INJECTED SEWAGE SLUDGE WILL NOT BE APPLIED ON SLOPES

GREATER THAN 20 PERCENT. SLUDGE WHICH IS SURFACE-APPLIED AND NOT DISCED WILL NOT BE APPLIED ON SLOPES GREATER THAN 6 PERCENT.

8. APPLICATION OF SEWAGE SLUDGE WILL BE DONE ALONG THE CONTOUR WHEN PRACTICAL.

F. SPILL PREVENTION AND CONTROL

A SLUDGE SPILL IS CONSIDERED THE LOSS OF ANY "MEASURABLE QUANTITY" OF SLUDGE FROM THE TRANSPORT VEHICLE WHICH IS NOT ON A PERMITTED APPLICATION SITE. THIS IS MEANT TO INCLUDE SLUDGE SEEPING FROM TAILGATES OR SLUDGE DRIPPING FROM VALVES. MAJOR SPILLS, SUCH AS OVERTURNED VEHICLES ARE INCLUDED IN THIS CATEGORY.

PREVENTION

IT IS THE RESPONSIBILITY OF EACH PROJECT MANAGER TO OPERATE HIS SITE AND HAULING OPERATION IN A MANNER SO AS TO MINIMIZE SPILL POTENTIAL. ALL MIXER TRUCKS MUST HAVE RUBBER SEALS AROUND ALL HATCHES WHICH CAN BE MECHANICALLY TIGHTENED TO PREVENT ANY LEAKAGE. ANY DUMP TRUCKS USED TO TRANSPORT SLUDGE MUST HAVE A SEAL GASKET ON TAILGATES AS IT MAKES CONTACT WITH THE REST OF THE TRUCK BODY. ANY MIXER UNITS OR DUMP TRUCKS WITHOUT SEALS ARE TO BE CONSIDERED UNACCEPTABLE.

AT THE BEGINNING OF EACH DAY'S OPERATION, ALL VEHICLES WILL BE VISUALLY INSPECTED FOR INTEGRITY OF THE SEAL. AFTER LOADING, EACH UNIT WILL BE CHECKED FOR LEAKAGE PRIOR TO THE UNIT OPERATING ON PUBLIC ROADWAYS. NO TRUCKERS OR CONTRACT HAULERS ARE TO BE UTILIZED UNTIL THEIR UNITS HAVE BEEN INSPECTED AND VERIFIED AS WATERTIGHT. ANY SEEPAGE OR DRIPPING IS UNACCEPTABLE.

IN THE UNLIKELY EVENT OF A SPILL, BIO GRO SYSTEMS, INC. WILL TAKE THE FOLLOWING ACTIONS IMMEDIATELY:

1. HALT SOURCE OF SPILL; e.g., RUPTURED LINE OR VALVE OF DAMAGED TANK UNIT.
2. CONTAIN SPILL. IN THE EVENT LARGE QUANTITIES OF LIQUID SLUDGE HAVE BEEN SPILLED, USE STRAW BALES WHERE AVAILABLE TO EITHER FORM A BARRIER OR SOAK UP SLUDGE.
3. CLEAN-UP. EMPLOY VACUUM EQUIPMENT ON SLUDGE APPLICATOR TO REMOVE AS MUCH SPILLED MATERIAL AS POSSIBLE. COMPLETE CLEAN-UP BY SCATTERING STRAW BALES, SOAKING UP REMAINING MATERIAL. PICK UP STRAW MANUALLY AND INCORPORATE AT A PERMITTED SITE OR IN A LANDFILL.
4. FINAL CLEAN-UP. FLUSH ROADWAYS WITH WATER AS NECESSARY TO CLEAN. ALLOW TO DRY AND INCORPORATE IF SPILL OCCURS ON NON-PAVED AND TILLABLE AREA. IN THE EVENT A SPILL OCCURS ON PRIVATE PROPERTY, FINAL CLEAN-UP SHOULD BE COMPLETED IMMEDIATELY TO THE SATISFACTION OF THE OWNER.

5. MANAGEMENT OF CLEAN-UP EFFORTS.

THE PROJECT MANAGER SHALL TAKE IMMEDIATE CHARGE AND INITIATE CLEAN-UP ACTIVITIES. BIO GRO LABOR SHALL BE USED. ADDITIONAL LABOR SHALL BE SECURED AS NEEDED. THE PROJECT MANAGER SHALL ALSO COMMUNICATE WITH THE PUBLIC ON THE SCENE, ANSWERING QUESTIONS AND ADVISING OF CLEAN-UP ACTIVITIES.

6. REPORTING.

IN THE EVENT OF A SPILL, THE PROJECT MANAGER OR HIS FIELD REPRESENTATIVE SHALL IMMEDIATELY NOTIFY THE BIO GRO OFFICE AT (301) 263-2237. INDIVIDUALS TO BE NOTIFIED ARE AS FOLLOWS IN DESCENDING ORDER OF PRIORITY:

	<u>HOME PHONE</u>	<u>PAGER/ CAR PHONE</u>
HARRY HARLESS PROJECT MANAGER	(301) 934-1204	(202) 837-1591
STEPHEN TOFT AGRONOMY MANAGER	(301) 956-2957	(301) 266-2431
TOM TROESCHEL REGIONAL MANAGER	(301) 982-0098	(202) 288-4281
BILL BLANCHET VP, OPERATIONS	(301) 263-1927	(202) 288-3826
STEPHEN CAMPBELL PRESIDENT	(301) 867-7144	(202) 288-4291

AFTER NOTIFICATION OF A SPILL TO BIO GRO'S MANAGEMENT, THE PROJECT MANAGER SHALL NOTIFY THE MARYLAND DEPARTMENT OF ENVIRONMENT (301/631-3424 - WORK; 301/974-3351 - NON-WORK). A WRITTEN REPORT DETAILING HOW THE SPILL OCCURRED AND ALL ACTION TAKEN SHALL ALSO BE SUBMITTED TO THESE AGENCIES WITHIN 24 HOURS.

G. RECORDS KEEPING.

DAILY WEIGHT TICKETS ARE KEPT ON-SITE BY THE SITE MANAGER OR OPERATOR AS WELL AS AN APPLICATOR REPORT. IN ADDITION, THE SITE MANAGER KEEPS A COPY OF THE SITE PERMIT AND THE WMA PERMIT WITH HIM AT THE JOB SITE. ALL OTHER REPORTS AND RECORDS ARE KEPT AT THE BIO GRO MAIN OFFICE IN ANNAPOLIS, MARYLAND AND ARE OPEN FOR REGULAR INSPECTION.

A MONTHLY REPORT CONSISTING OF A MONTHLY DOSAGE RATE EVALUATION BASED ON CURRENT SLUDGE CHEMICAL ANALYSIS AND A FIELD REPORT FOR EACH FIELD TO WHICH SLUDGE WAS APPLIED IS SENT TO THE DEPARTMENT OF ENVIRONMENT, WASTE MANAGEMENT ADMINISTRATION.



H. FUTURE USE OF SITE.

AGRICULTURAL SITES: FOR THOSE SITES THAT UTILIZE SLUDGE FOR CROP PRODUCTION, THE FUTURE USE OF THE SITE IS AGRICULTURAL.

MINE SITES: BECAUSE OF THE GRADING REQUIREMENTS IMPOSED ON MINING OPERATORS, MINE SITES WHICH USE SLUDGE AS PART OF THEIR RECLAMATION PROGRAM MUST REMAIN UNDISTURBED FOR TWO YEARS. AFTER THAT POINT, THE USE IS DEPENDENT UPON THE ZONING OF THE SITE.

I. TRANSPORTATION ROUTES.

THE TRANSPORT TRUCKS WILL EMPLOY THE MOST DIRECT ROUTES TO THE VARIOUS LAND-APPLICATION SITES AS INFLUENCED BY TRAFFIC CONDITIONS AND RESTRICTED BRIDGES. SEE HAUL ROUTE MAP WHICH IS INCLUDED IN THIS APPLICATION.

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OPERATIONS PLAN
BIO GRO SYSTEMS, INC.
FOR STORAGE OF THE
SENECA AND DAMASCUS WASTEWATER TREATMENT PLANT SLUDGES

One Mast-Lepley concrete storage facility will be constructed on the Alfred Spates farm to:

1. Provide storage of the Seneca and Damascus Wastewater Treatment Plant sludges when site conditions do not permit the direct application of the sludges.
2. Provide for the maximum utilization of sludge for the Spates Farm fertilizer program.

SITE LOCATION

The concrete facility will be located off Westerly Road on the Spates Farm (Poolesville, Maryland in Montgomery County), in the central area of the farm as noted on the maps included in this attachment.

DESIGN AND CONSTRUCTION

The dimensions of the circular facility are 12' high x 90' in diameter, with a freeboard of at least 8". Tank capacity is 572,490 gallons and with an 8" freeboard would allow 536,709 gallons storage capacity. Details of tank design and installation are included in this attachment in the literature supplied by the Mast-Lepley Corporation.

The tank will be placed on level ground (0-2% slope) after the site is cleared, hand-raked and sufficiently compacted to ensure footer stability. Construction will be performed by Mast-Lepley, Inc. personnel in accordance with the instructions of Mast-Lepley, Inc. No storage will take place until inspected and approved for storage by the Maryland Department of the Environment (MDE) personnel.


CONTINGENCY PLAN AND ODOR CONTROL

The Spill Prevention and Control Plan described in Section F will be employed for the Mast-Lepley facility operations. Unloading operations at the tank will be conducted so as to minimize potential spillage.

Odor Control Measures

The proposed storage facility has been located in a remote area at sufficient distance from off site inhabited dwellings to minimize possible odor complaints. If odor control is necessary, appropriate levels of lime will be applied to any material stored in the facility.

Freeboard



The Weather Almanac indicates that the greatest 24-hour rain event was 7.19 inches for Washington, D.C. and 7.49 inches for Baltimore, Maryland. This is less than the eight inches of freeboard proposed in our application and approved by the Maryland Department of the Environment for our Modutank permits in Anne Arundel County, Prince George's County and for Enviro-Gro Technologies' Modutank permits in Howard County, Maryland.

It is not expected that precipitation will exceed evaporation by 6.5 inches for the period between October and March. In any case, Bio Gro is committed to maintain an eight-inch freeboard (sufficient for 24-year, 24-hour rain event). The difference between precipitation and evaporation is irrelevant in a situation where a minimum freeboard will be maintained, regardless of precipitation.

OPERATIONAL METHODS

Loading

Bio Gro will load the storage tank from liquid trailers pulled by truck tractors. The liquid trailers will back up to a sump receptacle to be constructed at a predetermined location and discharge sludge into the sump. The sludge will then be pumped up the tank wall and placed at the bottom of the tank (see attached drawings).

Unloading

Bio Gro will remove sludge from the storage tank to be sub-surface or surface applied. The material will be slurried using high pressure water from a water truck and then pumped into a Terra-Gator. The concrete sumps (5' x 5' x 2' deep) will be utilized to facilitate this operation. The storage facility will be completely cleaned each spring/summer after winter use.

RESTRICTING PUBLIC ACCESS

The proposed storage facility will be located in the center section of the Spates farm. The proposed site location is currently fenced with a locked gate on the access road. In addition, the tank dimension of 12' in height will prevent any physical access to the tank interior. Warning signs and No-Trespassing signs will also be posted.

CONTINGENCY PLAN FOR FACILITY REPAIR

Should the storage facility require repairs of any kind related to the structural design or concrete stability, the entire facility will be emptied, cleaned and then repaired to the specifications set by the manufacturer. A subsequent inspection will be performed by the Department of Environment prior to utilizing the facility.

CLOSE-OUT

A close-out plan will be determined by the condition of the facility, in concurrence with Bio Gro personnel and MDE personnel, at the end of the specific contract. The landowner will have the option, following an approved MDE clean-out, to keep the facility for farm use.

Should the facility be removed, it will be washed on site, with the wash material going on permitted fields, dismantled and the materials hauled to a permitted sanitary rubble fill.

CONTRACT NO. 17933

ATTACHMENT NO. I

WASTEWATER OPERATIONS DIVISION LABORATORY

SENECA SLUDGE ANALYSIS

12 MONTH AVERAGE
October 1988 through September 1989

Parameter	mg/kg dried solids (except as noted)
Aluminum - Al	23,300
Beryllium - Be	< 0.365
Boron	4.22
Cadmium - Cd	<1.36
Chromium - Cr	18.5
Cobalt - Co	<6.66
Copper - Cu	711
Iron - Fe	12,100
Lead - Pb	57.0
Manganese - Mn	631
Mercury - Hg	6.48
Nickel - Ni	25.3
Potassium - K	3,540
Silver - Ag	90.9
Sodium - Na	970
Tellurium - Te	<13.4
Vanadium - V	<3.70
Zinc - Zn	395
Ratio Cd:Zn	<0.35x
Total Hardness as CaCO ₃	133,000
Calcium Hardness as Ca ²⁺	33,900
Magnesium Hardness as Mg	11,700
Ammonia - NH ₃ -N	5,790
Organic Nitrogen - ON-N	59,200
Total Kjeldahl Nitrogen - TKN-N	65,100
Nitrates - NO ₃ -N	244
Total Phosphorus - P	35,300
<hr/>	
pH	6.9 units
Tot. Alkalinity - CaCO ₃	6,080 mg/L
Chlorides - Cl	6,750 mg/L
Sulfate - SO ₄	3,820 mg/L
Total Soluble Salts as CaCO ₃	19,600 mg/L
Specific Conductance as us/cm/cm	43,600 umho/cm
Total Solids	112,000 mg/L
% Volatile Solids	71.5%
% Moisture	88.8%

CONTRACT NO. 17933

ATTACHMENT NO. I

WASTEWATER OPERATIONS DIVISION LABORATORY

DAMASCUS SLUDGE ANALYSIS

12 MONTH AVERAGE
October 1988 through September 1989

Parameter	mg/kg dried solids (except as noted)
Aluminum - Al	12,800
Beryllium - Be	< 0.210
Boron - B	4.35
Cadmium - Cd	2.39
Chromium - Cr	14.6
Cobalt - Co	<4.82
Copper - Cu	624
Iron - Fe	5,340
Lead - Pb	41.0
Manganese - Mn	204
Mercury - Hg	4.00
Nickel - Ni	21.0
Potassium - K	3,800
Silver - Ag	<27.2
Sodium - Na	970
Tellurium - Te	<8.52
Vanadium - V	<1.0
Zinc - Zn	378
Ratio Cd:Zn	0.61x
Total Hardness as CaCO ₃	158,000
Calcium Hardness as Ca ³	40,000
Magnesium Hardness as Mg	13,900
Ammonia - NH ₃ -N	7,230
Organic Nitrogen - ON-N	73,400
Total Kjeldahl Nitrogen - TKN-N	80,600
Nitrates - NO ₃ -N	174
Total Phosphorus - P	23,400
<hr/>	
pH	6.99 units
Tot. Alkalinity - CaCO ₃	7,540 mg/L
Chlorides - Cl	7,330 mg/L
Sulfate - SO ₄	3,460 mg/L
Total Soluble Salts as CaCO ₃	21,900 mg/L
Specific Conductance as us/cm-cm	46,400 umho/cm
Total Solids	118,000 mg/L
% Volatile Solids	73.6x
% Moisture	88.2x

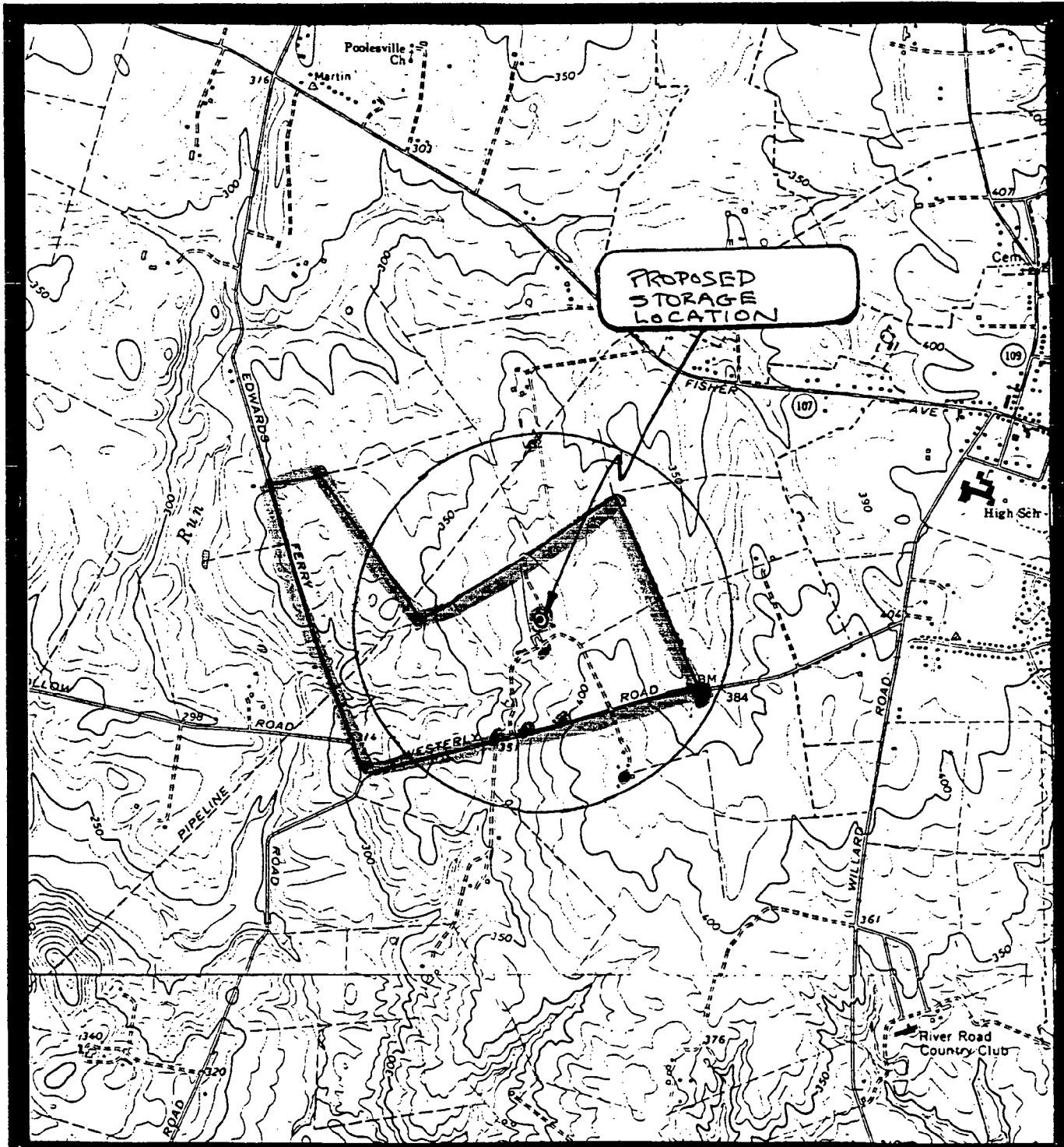
KEY TO WELL LOCATION MAP

SCALE 1" = 24,000

RED HIGHLIGHT	=	WELL LOCATION
YELLOW HIGHLIGHT	=	1/2 MILE RADIUS FROM SITE
GREEN HIGHLIGHT	=	FARM BOUNDARY



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SCALE 1:24,000

MT-4 STORAGE

Well Location



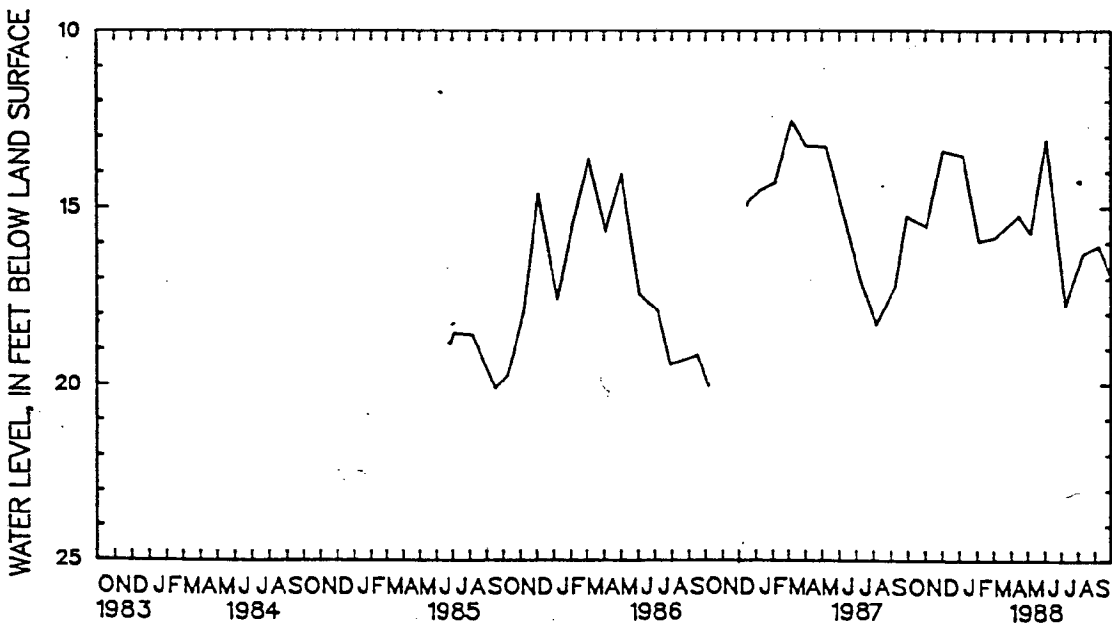
GROUND-WATER LEVELS
 MARYLAND--Continued
 MONTGOMERY COUNTY--Continued



WELL NUMBER.--MO Db 68. SITE ID.--390802077283801. PERMIT NUMBER.--MO-73-1869.
 LOCATION.--Lat 39°08'02", Long 77°28'38", Hydrologic Unit 02070008, south of Club Hollow Rd at National Institutes of Health Animal Center.
 Owner: U.S. Geological Survey.
 AQUIFER.--New Oxford Formation.
 WELL CHARACTERISTICS.--Drilled water-table observation well, depth 250 ft; casing diameter 6 in. with depth to 40 ft; open hole.
 INSTRUMENTATION.--Measurements with chalked steel tape by USGS personnel.
 DATUM.--Elevation of land-surface datum is 260 ft above National Geodetic Vertical Datum of 1929.
 Measuring point: Top of casing, .8 ft above land-surface datum.
 PERIOD OF RECORD.--May 1978 to August 1980, June 1985 to current year.
 EXTREMES FOR PERIOD OF RECORD.--Highest water level measured, 12.40 ft below land-surface datum, May 30, 1978; lowest measured, 20.15 ft below land-surface datum, Sept. 16, 1985.

WATER LEVEL, IN FEET BELOW LAND-SURFACE DATUM, WATER YEAR OCTOBER 1987 TO SEPTEMBER 1988

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
NOV 3	15.55	JAN 7	13.55	MAR 3	15.87	MAY 5	15.75	JUL 8	17.79	SEP 7	16.08
DEC 2	13.41	FEB 4	15.98	APR 14	15.24	JUN 3	13.10	AUG 9	16.30		



5 YEAR HYDROGRAPH
 OCTOBER 1, 1983 THROUGH SEPTEMBER 30, 1988

GROUND-WATER LEVELS
 MARYLAND--Continued
 MONTGOMERY COUNTY--Continued

WELL NUMBER.--MO Dc 72. SITE ID.--390752077243101. PERMIT NUMBER.--MO-73-2284.
 LOCATION.--Lat 39°07'52", Long 77°24'31", Hydrologic Unit 02070008, 0.1 mi west of Hughes Rd., Poolesville.
 Owner: U.S. Geological Survey.

AQUIFER.--New Oxford Formation.

WELL CHARACTERISTICS.--Drilled artesian observation well, depth 275 ft; casing diameter 6 in. with depth to 41 ft; open hole.

INSTRUMENTATION.--Measurements with chalked steel tape by USGS personnel.

DATUM.--Elevation of land-surface is 330 ft above National Geodetic Vertical Datum of 1929.

Measuring point: Top of casing, 4.42 ft above land-surface datum.

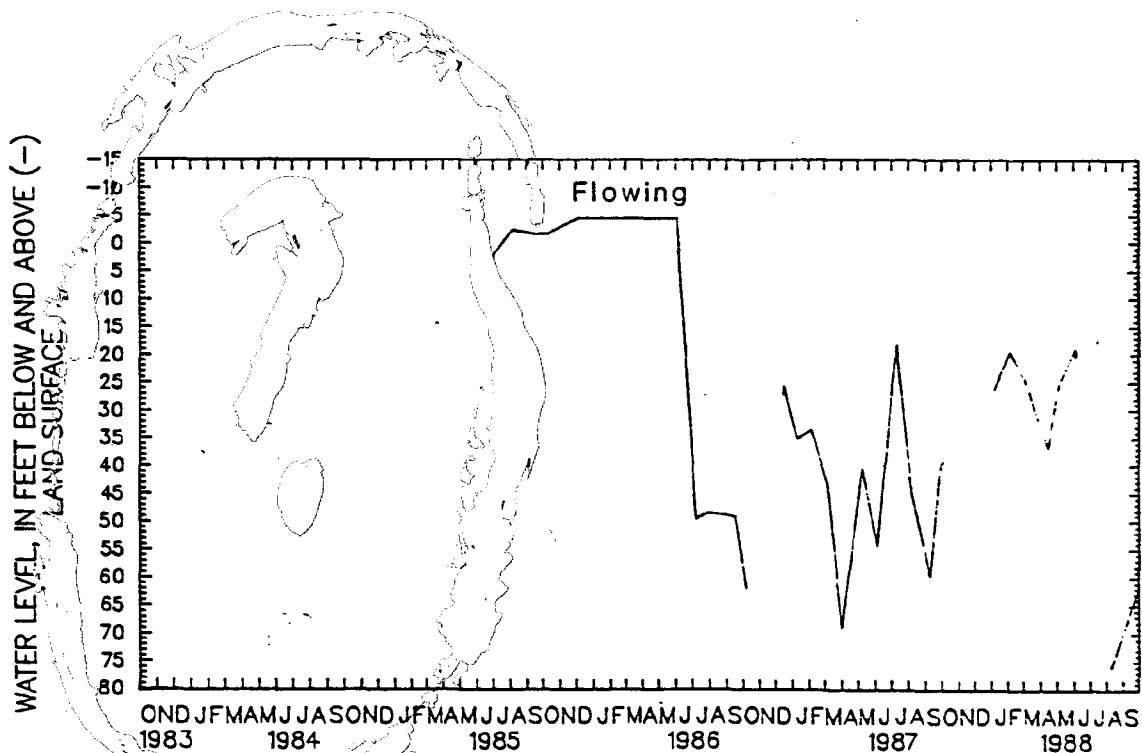
REMARKS.--Well flowing Dec. 4, 1985 through June 3, 1986. Water level affected by nearby pumping.

PERIOD OF RECORD.--June 1985 to current year.

EXTREMES FOR PERIOD OF RECORD.--Highest water level measured, 3.21 ft above land-surface datum, Nov. 7, 1985; lowest measured, 75.06 ft below land-surface datum, Aug. 9, 1988.

WATER LEVEL, IN FEET BELOW LAND-SURFACE DATUM, WATER YEAR OCTOBER 1987 TO SEPTEMBER 1988

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
JAN 7	26.13	MAR 3	23.92	MAY 5	25.16	AUG 9	75.06
FEB 4	19.53	APR 14	36.84	JUN 3	19.01	SEP 7	68.12



5 YEAR HYDROGRAPH
 OCTOBER 1, 1983 THROUGH SEPTEMBER 30, 1988

Soil Survey of Montgomery County, Maryland

mer temperatures are usually moderate, there may be periods of several days when the maximum temperature is above 90° F.

TABLE 8.—*Temperature and precipitation at Boyds, Montgomery County, Md.*

[Elevation, 580 ft.]

Month	Temperature ¹			Precipitation ²			
	Average	Absolute maximum	Absolute minimum	Average	Driest year (1930)	Wettest year (1952)	Average snowfall
	° F.	° F.	° F.	Inches	Inches	Inches	Inches
December.....	35.7	72	-4	2.62	2.54	2.96	3.1
January.....	33.1	78	-17	3.04	2.40	3.96	5.6
February.....	34.6	80	-14	2.59	1.73	1.86	5.9
Winter.....	34.5	80	-17	8.25	6.67	8.78	14.6
March.....	43.4	87	0	3.08	2.40	4.55	3.8
April.....	52.5	94	11	3.18	3.20	7.86	.4
May.....	62.6	97	29	3.52	1.15	5.92	(³)
Spring.....	52.8	97	0	9.78	6.75	18.33	4.2
June.....	71.3	102	35	3.73	2.86	4.89	0
July.....	75.2	106	45	3.47	.33	3.13	0
August.....	73.6	106	41	4.12	.82	9.19	(³)
Summer.....	73.4	106	35	11.32	4.01	17.21	0
September.....	68.0	102	31	3.31	.60	5.12	0
October.....	56.0	97	19	3.11	.29	1.17	.2
November.....	45.6	86	2	2.73	.78	6.25	.7
Fall.....	56.5	102	2	9.15	1.67	12.54	.9
Year.....	54.3	106	-17	38.50	19.10	56.86	19.7

¹ Average temperature based on a 30-year record, through 1950; highest and lowest temperatures on a 29-year record, through 1952.

² Average precipitation based on a 32-year record, through 1952; wettest and driest years based on a 20-year record, in the period 1920-52; snowfall based on a 29-year record, through 1952.

³ Trace.

Normally, winter crops receive little protection from

tion of seed in operations, such

Most creek banks and occasionally spring flooding bottom lands are used for pasture

Most rains are steady. Heavy when snow is on bottom lands. intense. Hurricane Montgomery County caused the most inches of rainfall and 6.40 inches

Vegetation

The natural mainly hardwood oak, chiefly white

Hardwood forests now comparatively few of these have been abandoned. Areas of abandoned forested with loblolly become dominant somewhat drought-tolerant. There is the county.

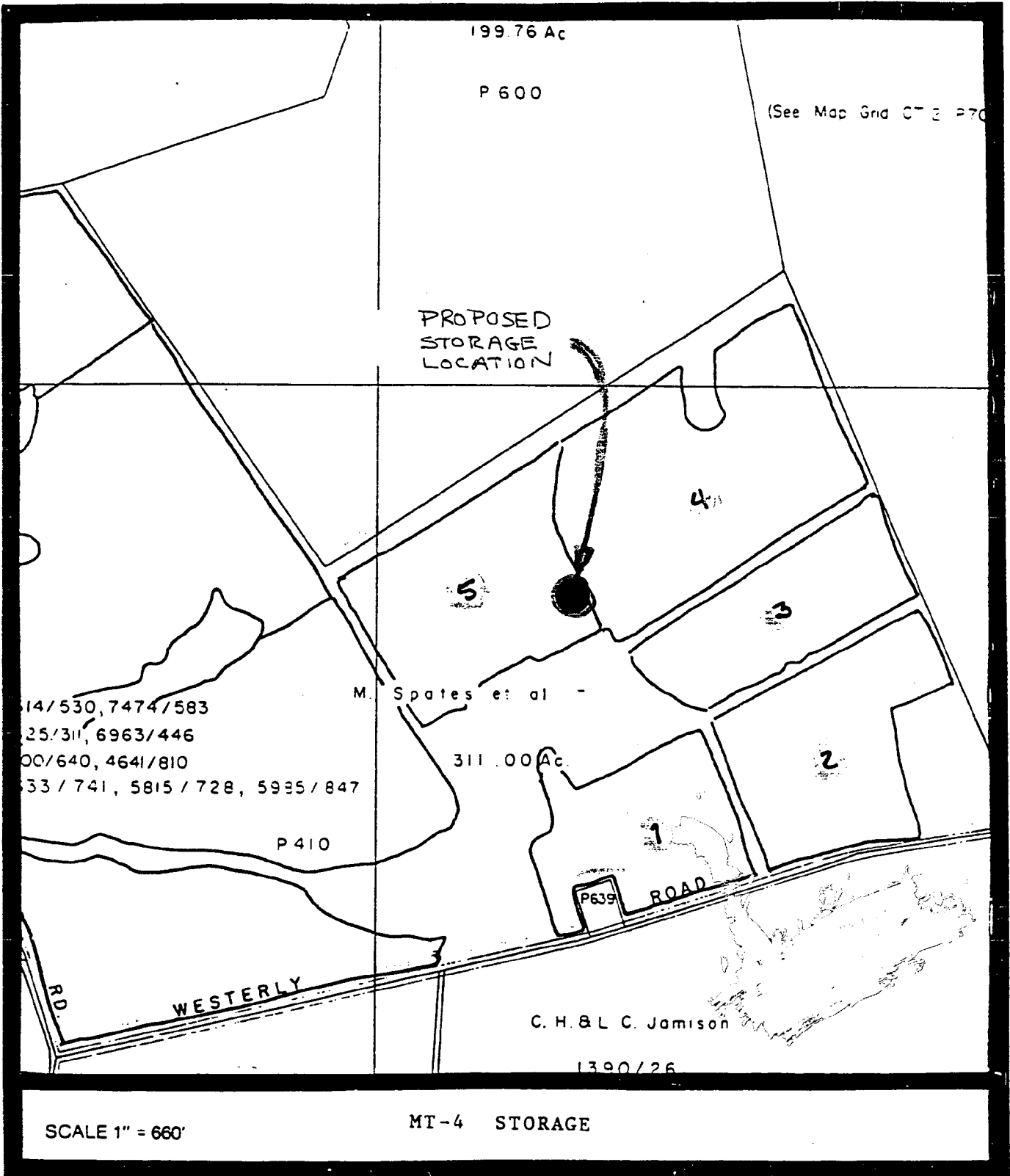
Additional information county is in the section, Forest

Industries, 5

Montgomery Most nonagricultural rather than commercial important heavy principally electrical industry other



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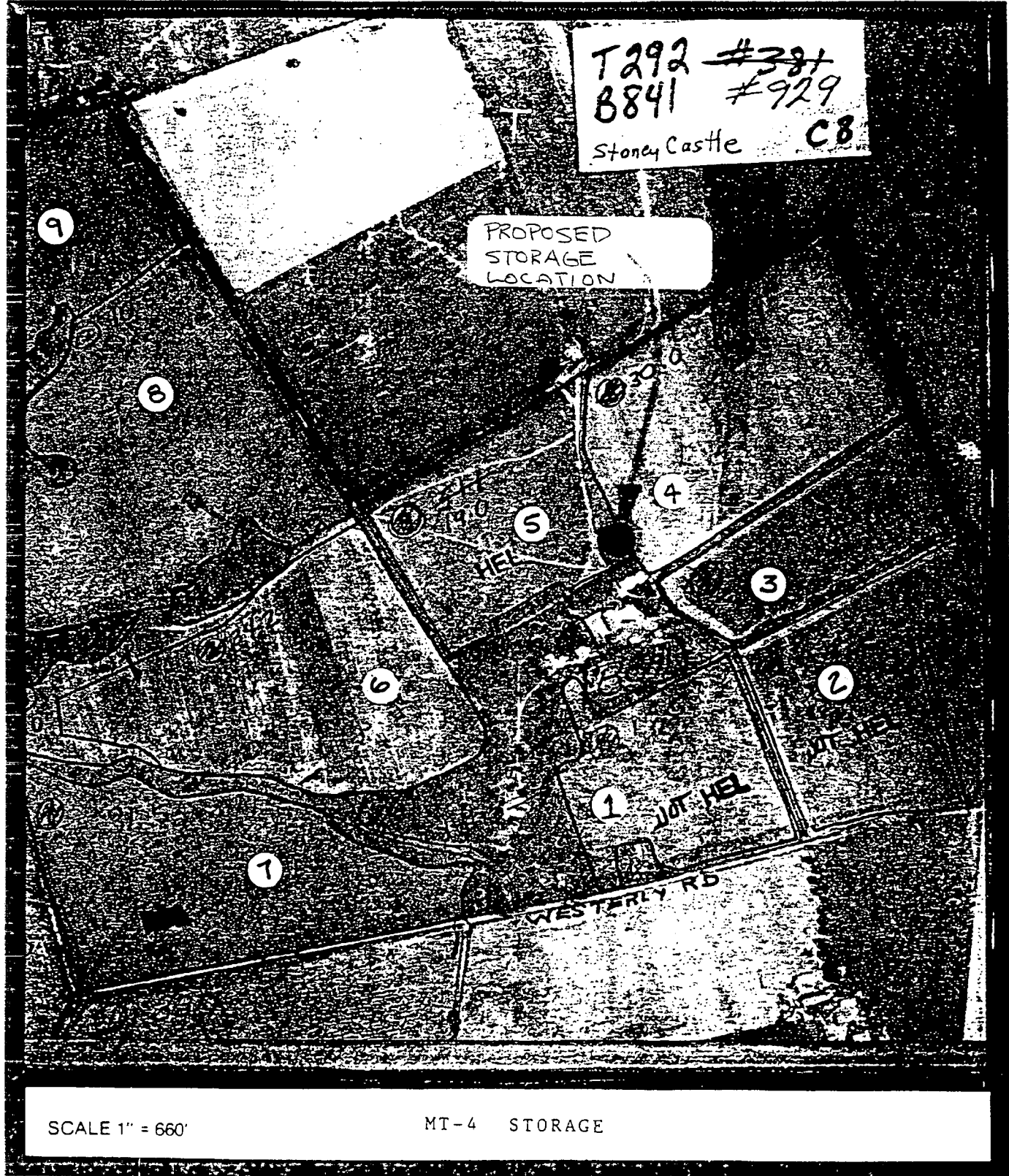


TAX MAP



BIOGRO SYSTEMS

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SITE PLAN

KEY TO MAPS

Red Circle with Red X = well

Black Circle with Square = occupied residence

Blue Line = paved road

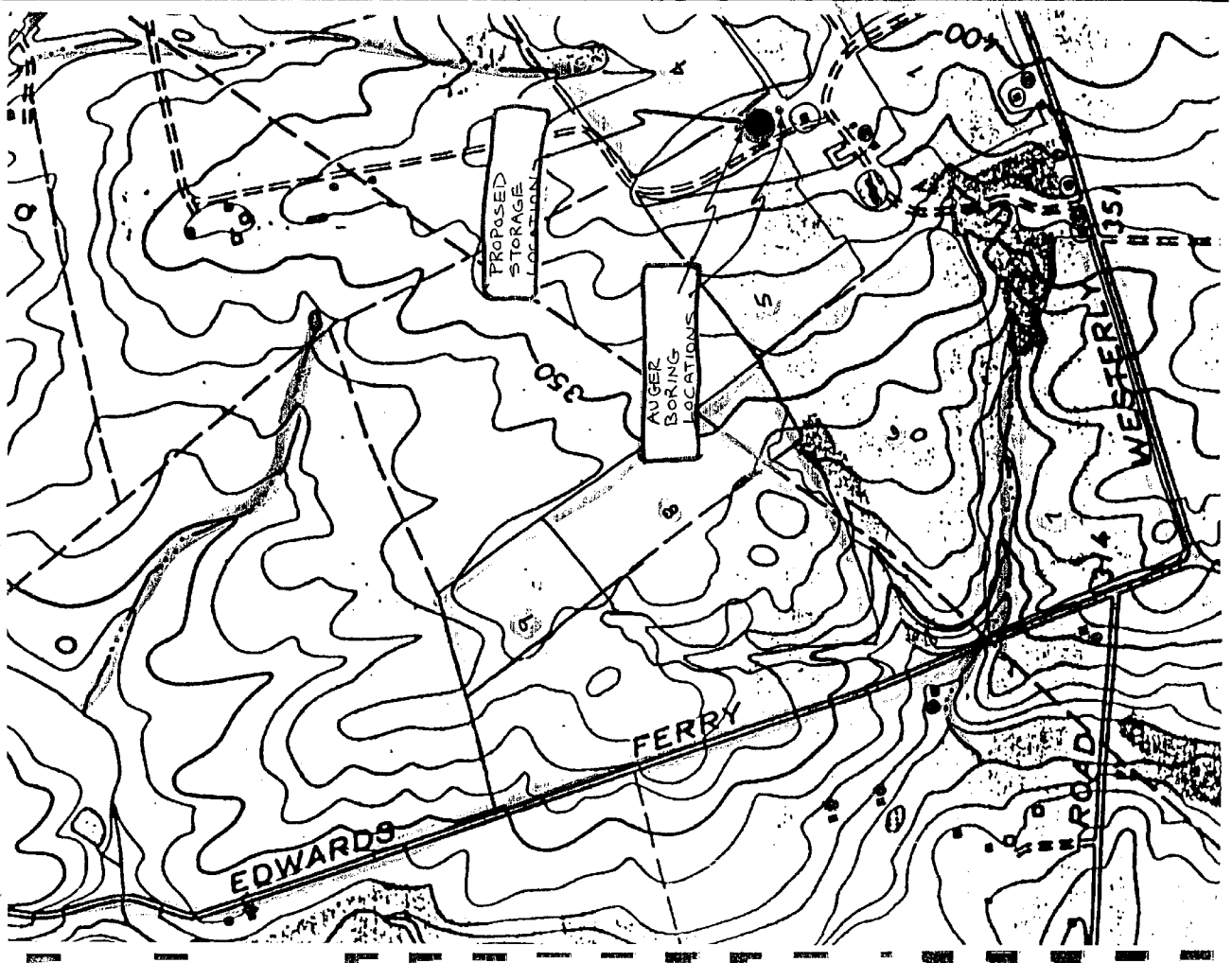
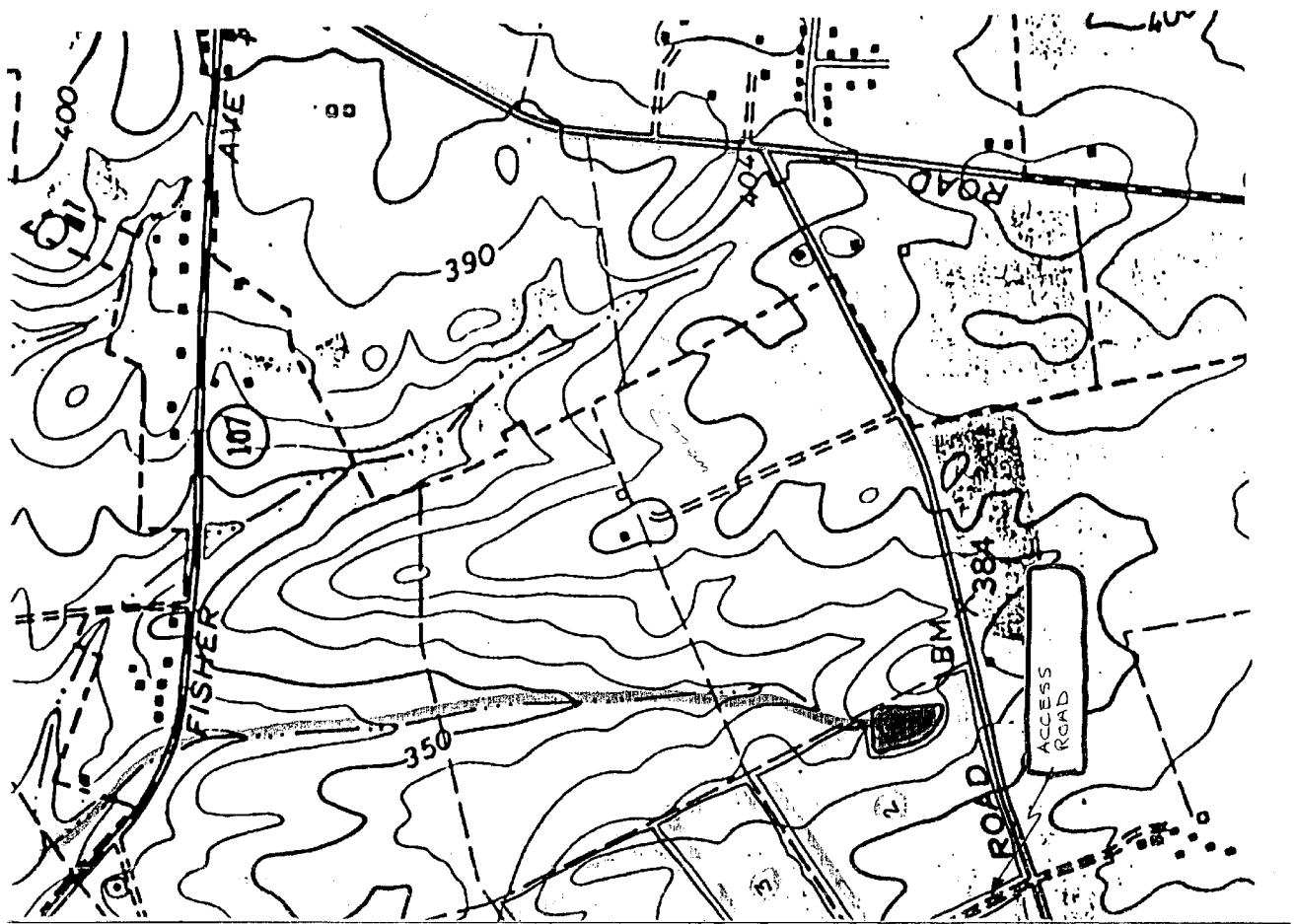
Red Line = buffer zone

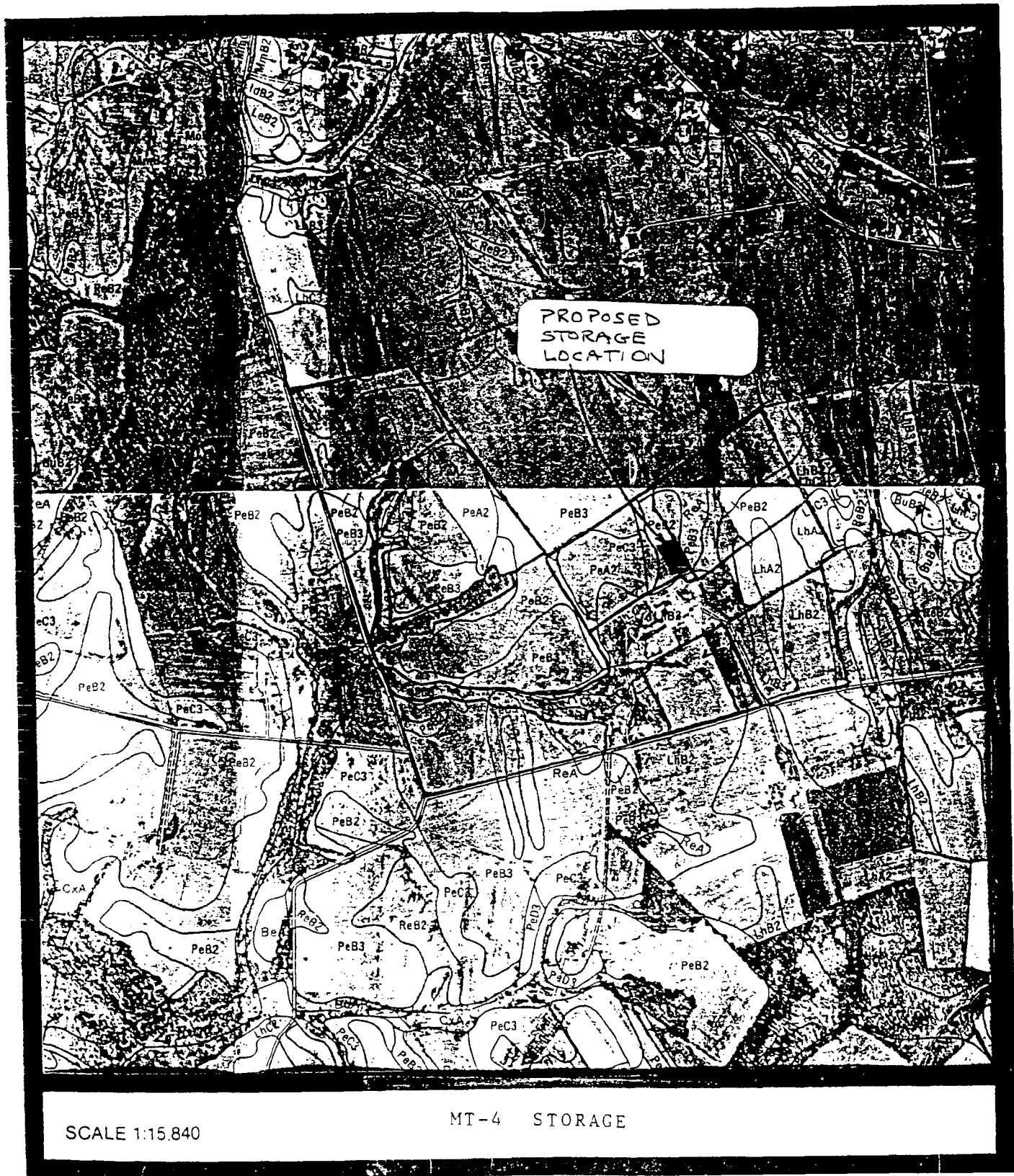
Green Line = stream or pond

Yellow Line = highlighted boundaries

Red Circle with 15 = buffer around a 15% slope or greater

Orange Line = ditches





SCALE 1:15,840

MT-4 STORAGE

SOILS MAP



SOIL PROFILE NOTES



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Profile #: 2
 Date of Test: 1/24/50 Soil Boring 2 or Test Pit _____
 Property Owner: Sparks
 Property Location: Dunbar Rd
 Site Evaluator: M. R. ... License No.: _____
 Slope: 0-3% Relief: gentle slope
 Estimated Permeability: well drained
 Depth to Limiting Zone: 29"
 Soil Series Identified: Penn salt loam Po B₂

Horizon	Depth	Colors		Mottles Desc.		Texture	Structure	Consistence
		Matrix	Mottles	Ab.	S. Con.			
A _p	0 to 7"	2.5 YR 2/2	—	—	—	SIL	med fine gr	fr
B	7 to 15"	10R 4/4	—	—	—	SIL	med v fine sbk	fr
C	15 to 29"	2.5 YR 4/4 1"	—	—	—	very shaker SIL	v w coarse sbk	fr
	6							
	6							
	6							
	6							
	6							

Comments: Access reduced @ 29"

M. R. ...

Site Evaluator's Signature

**SOIL PROFILE
NOTES**



Sludge Disposal • Specializing in Land Application

Profile #: 1
 Date of Test: 1/24/90 Soil Boring 1 or Test Pit _____
 Property Owner: Spruce
 Property Location: Parkway MD
 Site Evaluator: Mike Keenan License No.: _____
 Slope: 0-3% Relief: gentle slope
 Estimated Permeability: Well drained
 Depth to Limiting Zone: 30"
 Soil Series Identified: Penn Silt loam pBz

Horizon	Depth	Colors		Mottles Desc. Ab. & Con.	Texture	Structure	Coastal
		Matrix	Mottles				
A _p	0 to 6"	2.5 YR 2/2	—	—	SIL	mod fine gr	fric
B ₂	6 to 16"	10 R 4/4	—	—	SIL	mod sb, v fine	fric
C	16 to 30"	2.5 YR 4/6	—	—	very shaly SIL	VW coarse sbk	fric
	S						
	S						
	S						
	S						
	S						

Comments: Auger refusal @ 30"

Michael Keenan
 Site Evaluator's Signature

STANDARD ABBREVIATIONS

MOTTLES:

Abundance

l - few
c - common
m - many

Size

1 - fine
2 - medium
3 - large

Contrast

f - faint
d - distinct
p - prominent

TEXTURES:

s - sand
ls - loamy sand
sl - sandy loam

l - loam
sil - silt loam
si - silt

scl - sandy clay loam
cl - clay loam
sicl - silty clay loam

sc - sandy clay
sic - silty clay
c - clay

Textural Modifiers:

vf - very fine
f - fine
c - coarse

g - gravel and gravelly

STRUCTURE:

Grade

1 - weak
2 - moderate
3 - strong

Size

vf - very fine
f - fine
m - medium
c - coarse
vc - very coarse

Form or Type

pl - platy
pr - prismatic
bk - blocky
abk - angular blocky

sbk - subangular blocky
sg - single grain
gr - granular
m - massive

CONSISTENCE:

Moist

lo - loose
vfr - very friable
fr - friable

fl - firm
vfl - very firm
efl - extremely firm

Wet

so - nonsticky
ss - slightly sticky
s - sticky
vs - very sticky

po - nonplastic
ps - slightly plastic
p - plastic

PERMEABILITY:

Rapid: Coarse textured soils such as sands and loamy sands with no impervious layers, pans, or cemented layers.

Moderate: Medium textured soils such as sandy loams, loams, silt loams and silts. Sandy clay loams, clay loams and silty loams may also be in this category, as long as they are not found in dense compacted layers. Also no impervious layers, pans, or cemented layers.

Slow: Fine textured soils such as sandy clay, silt clay, and clay. Impervious layers, pans, or cemented layers would constitute a slow permeability.

Quality Storage Systems by
MAST-LEPLEY SILO, INC.

1088 N. Apple Creek Road
Wooster, Ohio 44691
Office (216) 264-9292

January 23, 1990

Attn: Steve Toft
Bio-Gro Systems Inc.
P. O. 204
Annapolis, MD 21404

SPECS FOR 12 X 90 MANURE PIT

Footer 2' X 2'
Floor 6" Thick
Walls 8" Thick

Footer: Steel No. 6 - 6 Horizontal
No. 4 - 2 rows 2' long placed every one foot.

Floor: Steel No. 4 - Every 8 1/2 inches.

Walls: Vertical Steel N. 4 - 9" on center first four foot double row.

Walls: Horizontal 42 rows of No. 5 Rebar.

All Steel Rebar Grade No. 60

I hope this is what you need, if not call me and verify.

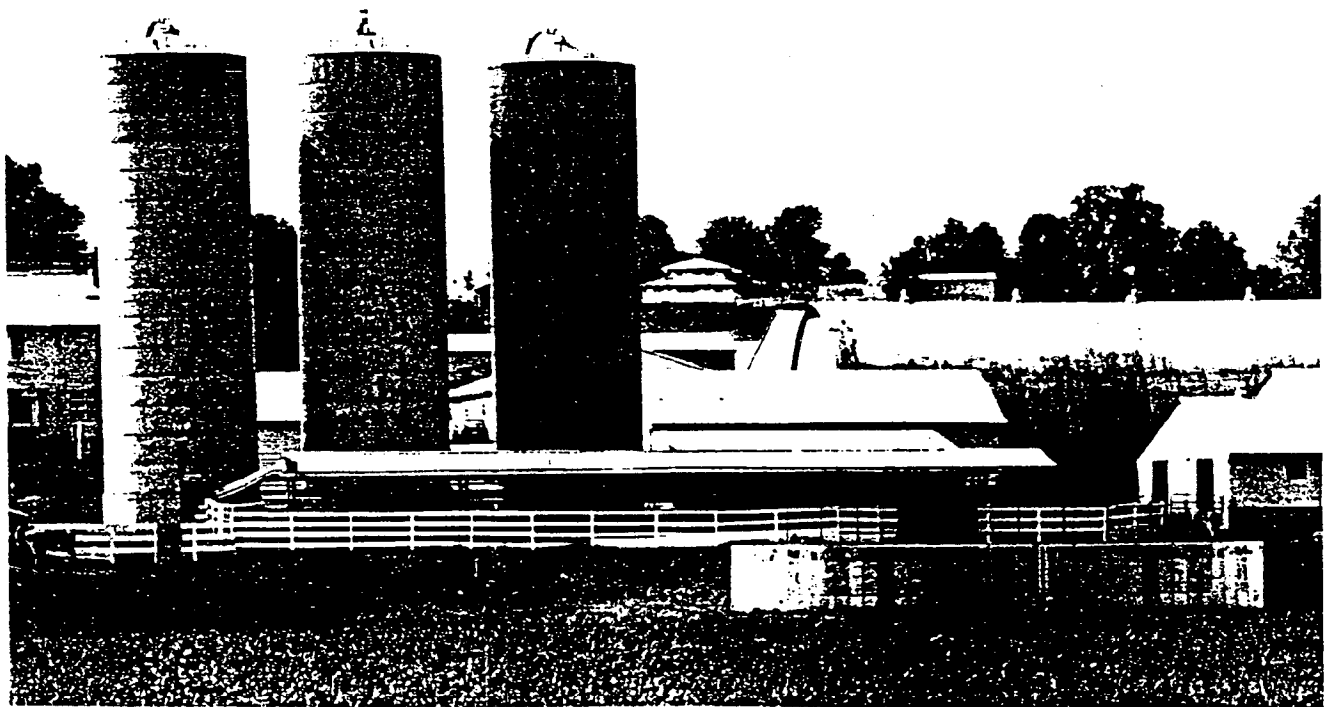
Thank You,

Lonny Starcher

LS:pjh

Manure Storage And Handling Systems

**DO MORE
THAN JUST SOLVE
A PROBLEM**



**The trend toward storing
manure continues**

BEAT THE HIGH COSTS OF FERTILIZER!

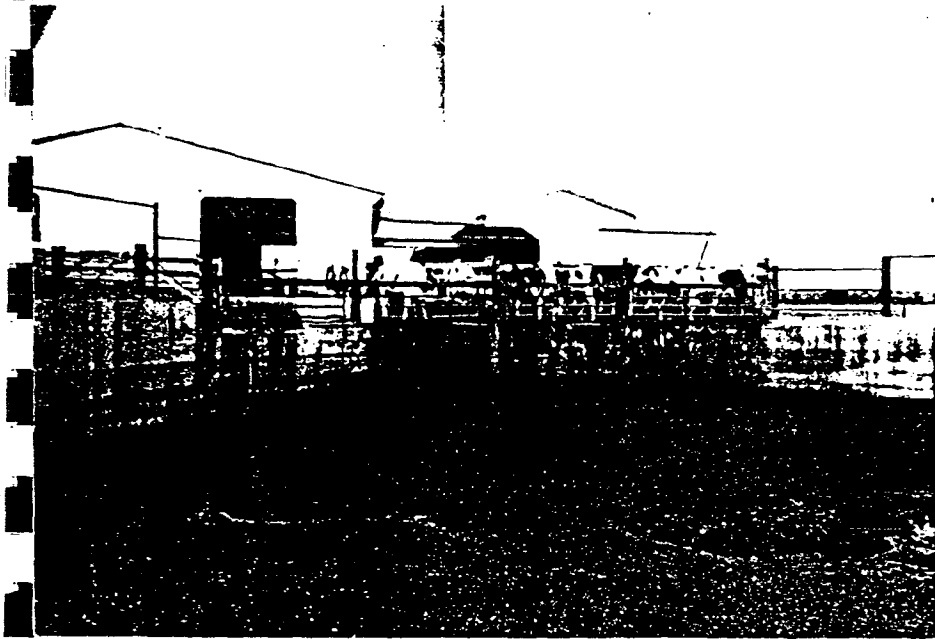
There's Money in Manure

Nobody has to tell you how fast the cost of raising crops is increasing every year. One of the biggest reasons is the rapidly increasing cost of purchasing fertilizer.

Based upon current costs of Nitrogen, Phosphate and Potash, the manure from one 1200 lb. animal could replace over \$100 of purchased fertilizer this year! Multiply that times the number of animals in your herd, and it's easy to see that manure shouldn't be treated as a troublesome nuisance but like a valuable resource. It just makes good Sense to turn a problem into a profit, by saving as much of the nutrients produced by your livestock as possible.

How? Make this the year you invest in a modern manure storage and handling system!

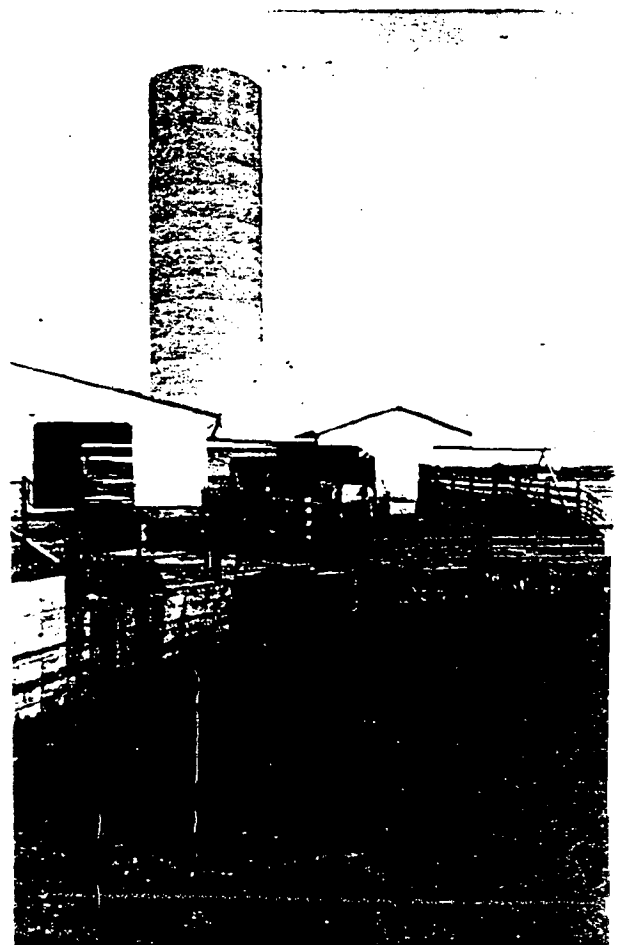
When you combine purchased fertilizer savings with reduced labor costs, lower tractor operation costs and elimination of the miserable daily scrape and haul job, a manure storage and handling system means Dollars and Sense.

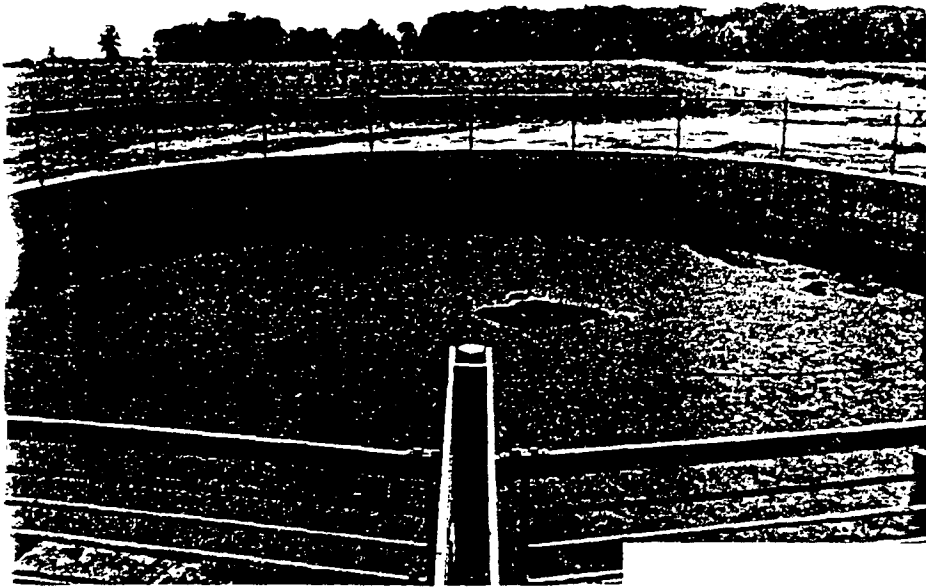


IMAGINE yourself standing in a corn field, watching as hundreds of dollars blow off the field. You can't catch the money, it just slips through your fingers.

Essentially, that's what often happens when farmers dispose of manure.

Spreading manure on frozen ground may be the easiest way to get an annoying farm by-product out of your hair. But it's almost like tossing cold hard cash into the wind. That stuff is worth big bucks nowadays if managed properly.



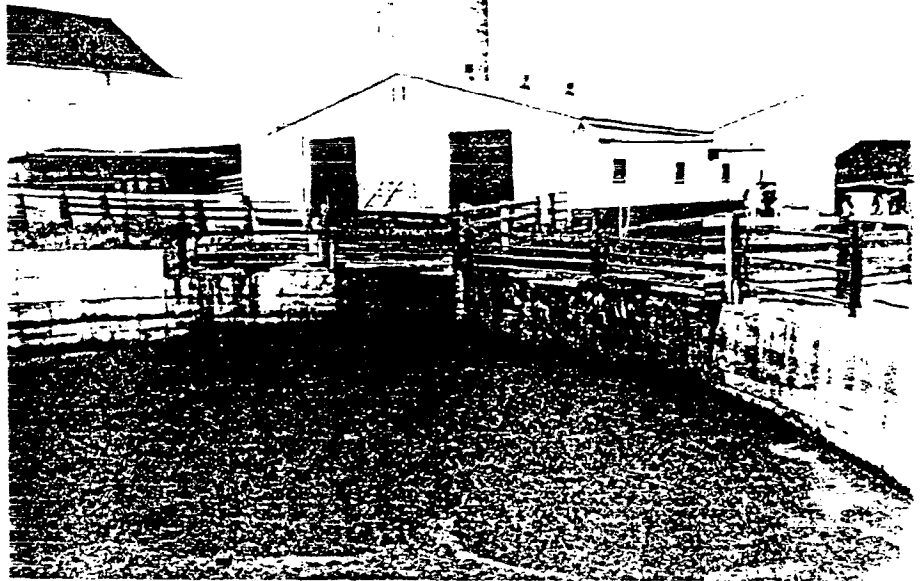


DAIRYMEN reveal how they are storing manure until fields are ready and how it can be plowed under immediately with nutrients intact.

They agree that storing not only saves manure nutrients but labor and tractor fuel required for daily hauling, often when fields are snow drifted or muddy.

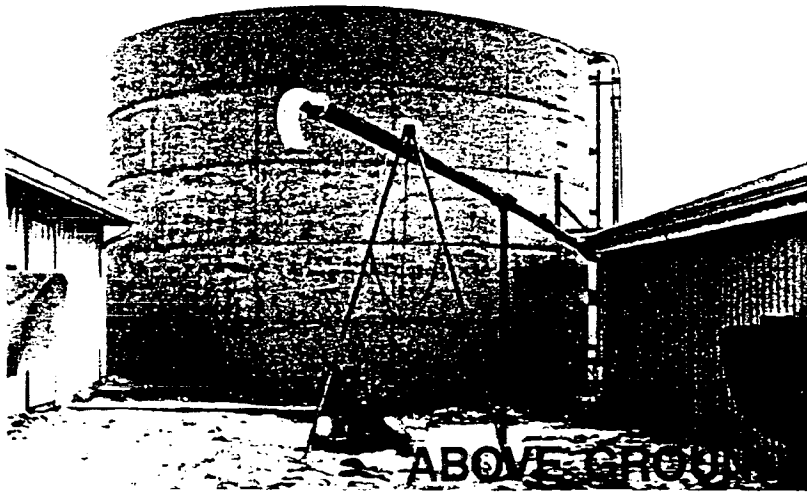
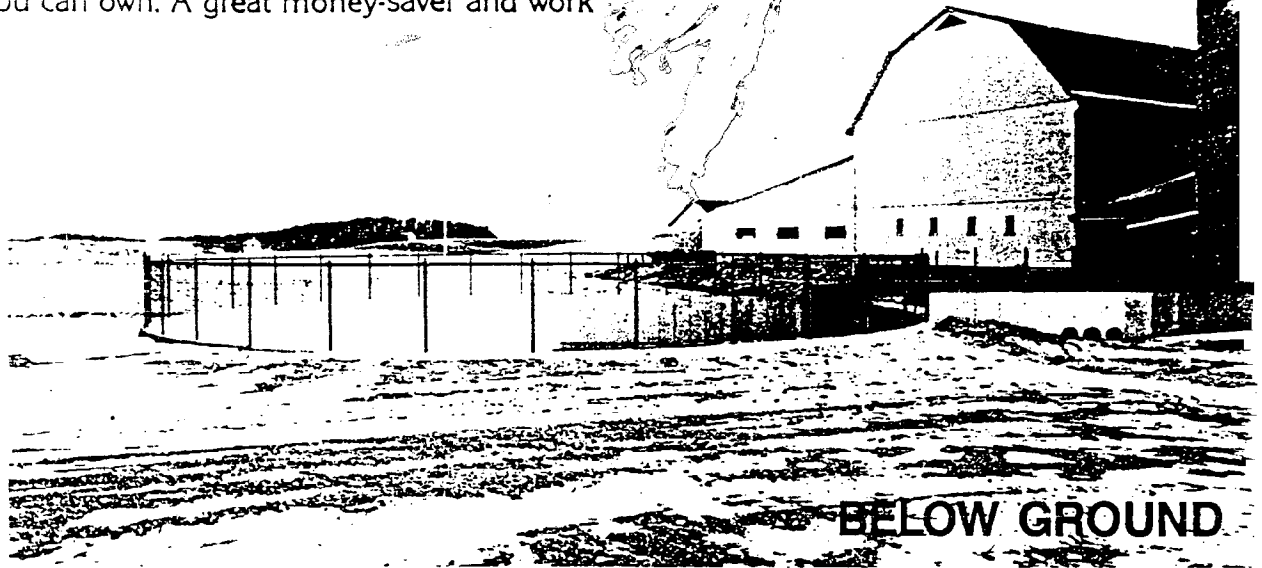
MODERN livestock operations require efficient manure handling systems.

With increasing interest in confinement hog and beef systems and free stall dairy operations, not to mention environmental concerns, liquid manure systems have come to the forefront as a desired means of handling livestock waste.



LIQUID MANURE TANKS

built sturdy like our silos. Reinforced with steel. Stores manure up to a year and retains maximum nitrogen and other nutrients for your fields. Diameters of 30 to 120 feet. Capacities of 53,000 to 1,000,000 gallons. Pumps sized to the job..the most efficient and dependable you can own. A great money-saver and work saver.



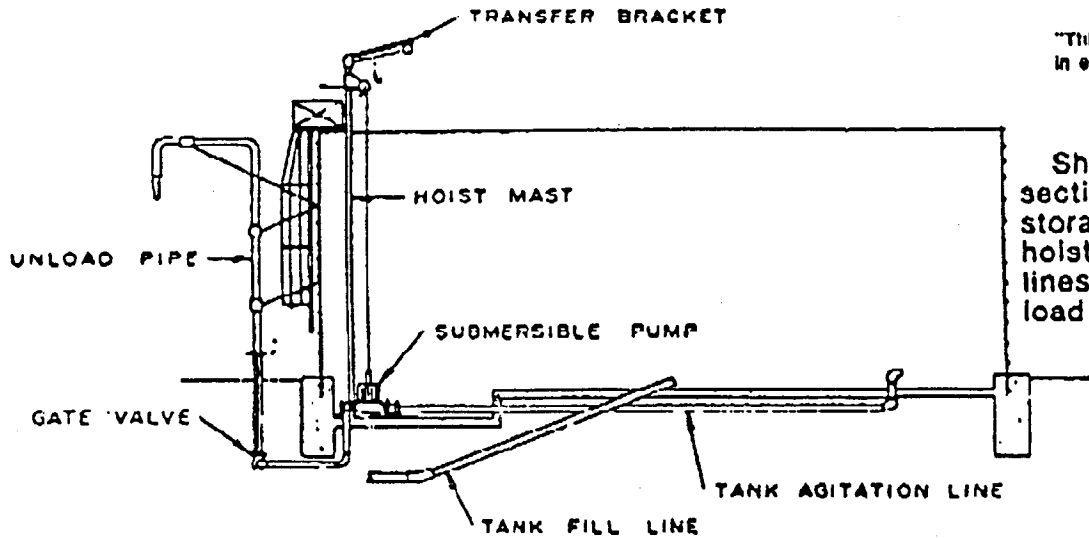
Satisfied Customers

Bauman Brothers - Sterling, Ohio
Crestland Farms - Sterling, Ohio
Golden Eggs, Inc. - Smithville, Ohio
Harley Heffelfinger - Loudonville, Ohio
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Myron Ramseyer - Sterling, Ohio
Steiner Farm - Seville, Ohio
Jim Winkler - Sterling, Ohio

★ *Soil Conservation Service Approved*

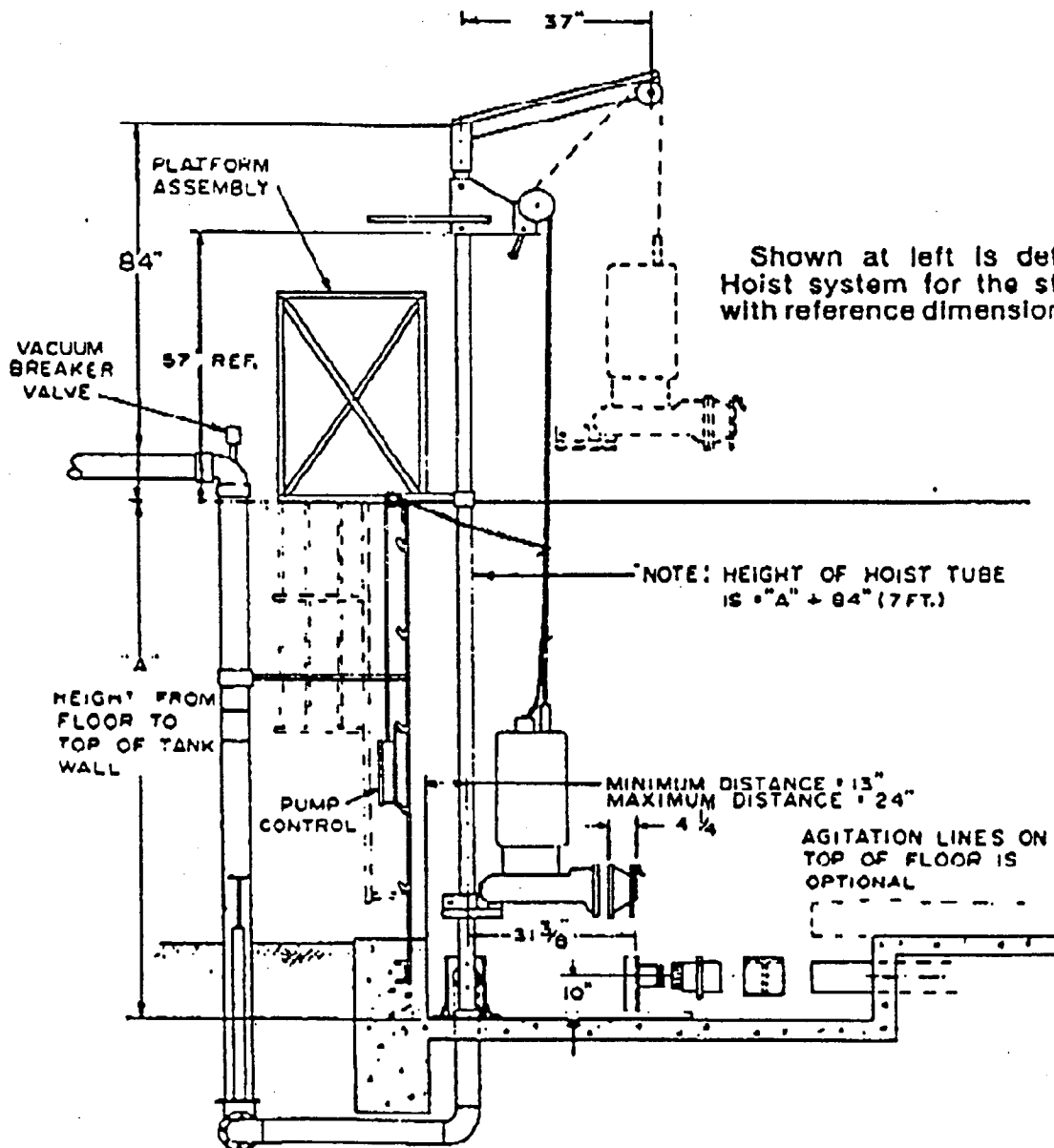
★ **MAST-LEPLEY SILO, Inc.**

1088 N. Apple Creek Rd., Wooster, Ohio 44691
(216) 264-9292



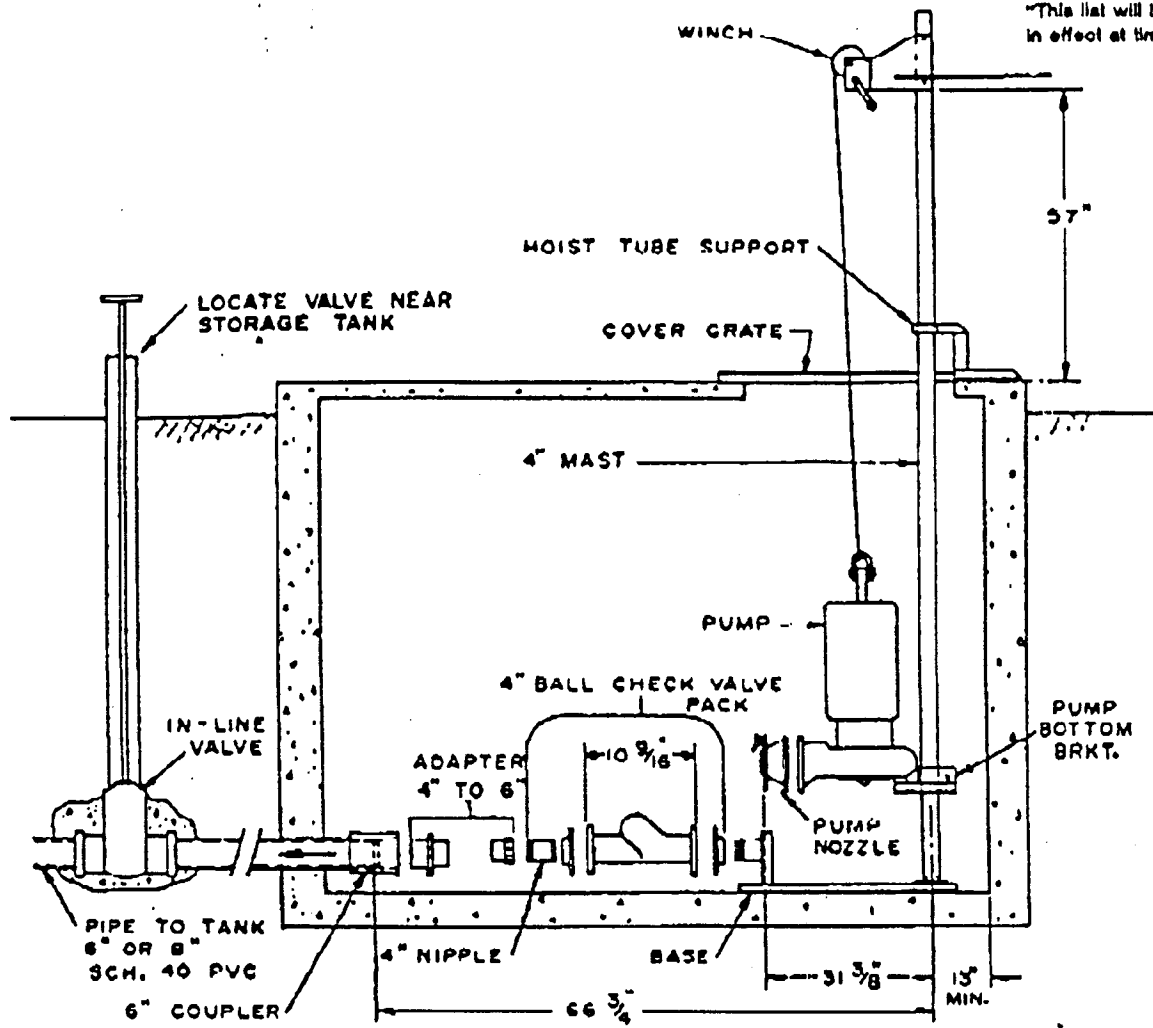
"This list will be superseded by prices in effect at time of shipment."

Shown at left is a cross-sectional view of a typical storage tank showing the lift hoist system, tank agitation lines below the floor, and the load out pipe system.

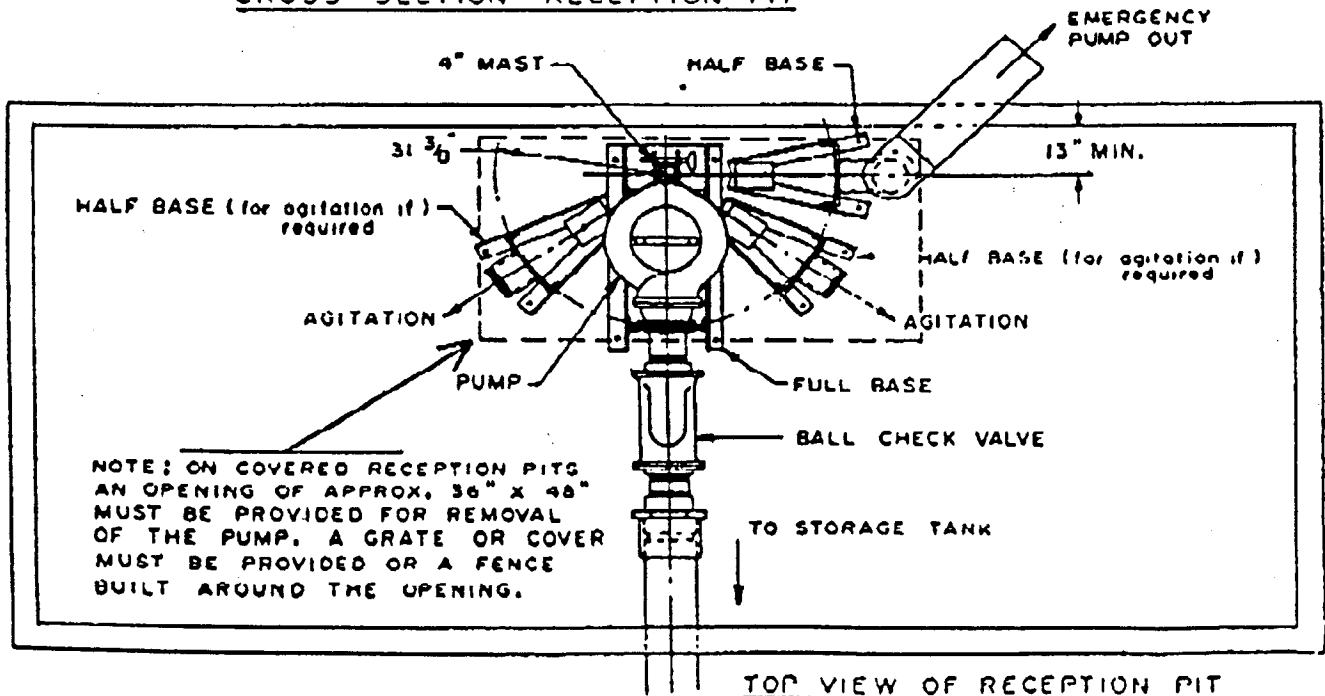


Shown at left is detail on Lift Hoist system for the storage tank with reference dimensions.

"This list will be superseded by prices in effect at time of shipment."



CROSS SECTION - RECEPTION PIT



NOTE: ON COVERED RECEPTION PITS AN OPENING OF APPROX. 36" X 48" MUST BE PROVIDED FOR REMOVAL OF THE PUMP. A GRATE OR COVER MUST BE PROVIDED OR A FENCE BUILT AROUND THE OPENING.

TOP VIEW OF RECEPTION PIT

MARYLAND
HISTORICAL



TRUST

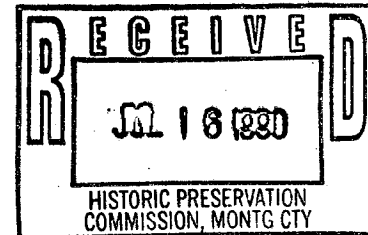
417/26

William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

July 6, 1990

Mr. Michael Stricker
Department of the Environment
Point Breeze Business Park
2500 Broening Highway
Baltimore, Maryland 21224



RE: Storage Facility Permit
Alfred Spates property
Montgomery County

Dear Mr. Stricker:

Our office has received the project listed above for our review and comment in accordance with Article 83B Section 5-618 of the 1985 Maryland Historic Preservation Law.

The Trust has reviewed the proposed construction of sludge storage facility for its effects on the Alfred Spates property in Montgomery County. While our office believes the Stoney Castle Farm (MHT M-17/26) is eligible for the Maryland Register of Historic Properties, the Trust has determined that the construction of a storage facility will have no adverse effect on the historic and architectural characteristics which qualify the property for eligibility in the Maryland Register of Historic Properties. Because the proposed construction will occur at grade, the project will have no effect on archeological resources. If the scope of the project changes, please notify us as soon as possible.

Thank you for providing us with this opportunity to comment.

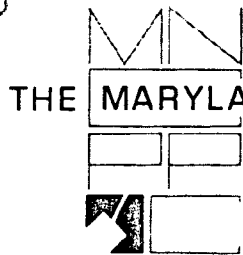
Sincerely,

Jo Ellen Freese
Administrator
Project Review and Compliance
Office of Preservation Services

JEF/EJC/LLB

cc: Mrs. George Kephart
Ms. Bobbi Hahn
Mr. Jared B. Cooper

#17/26

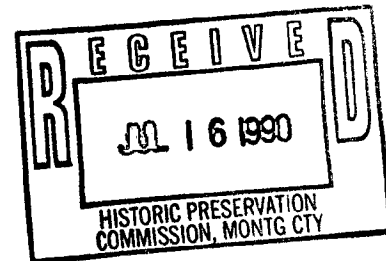


THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

8787 Georgia Avenue • Silver Spring, Maryland 20910-3760

July 11, 1990

William Chicca
Administrator
Solid Waste Program
Maryland Department of the Environment
2500 Broening Highway
Baltimore, MD 21224



Dear Mr. Chicca,

I am writing in regard to the application filed by Bio Gro Systems, Inc. for a sludge storage facility permit at the Alfred Spates property in Montgomery County. Please accept this letter as my testimony for the public hearing on this case and enter it into the official record.

The Spates Farm has been designated as a historic site on the Montgomery County Master Plan for Historic Preservation. It is my understanding that it has also been determined by the Maryland Historical Trust to be eligible for designation on the National Register of Historic Places. When the property was designated as historic by Montgomery County, an environmental setting was delineated. A map of this setting is attached.

As the Historic Preservation Planner for the Montgomery County Planning Board, I have no objection to the placement of a sludge storage facility on the Spates property - it is not inconsistent with the agricultural uses on the farm. However, I strongly recommend that the sludge facility be located outside of the delineated environmental setting and well away from the historic house and contributing outbuildings.

The Spates Farm - historically, called Stoney Castle - is one of the finest early homes in Montgomery County. It was built in 1831 and is associated with four generations of the White family - among the County's oldest and most historically important. There are a number of outbuildings associated with Stoney Castle which are also historically significant. This property not only derives its historic value as an individual house, but also as an intact collection of farm buildings that represents our County's agricultural heritage.

Thus, the defined environmental setting - which was thoughtfully developed to include the house, the outbuildings, and the drives leading to the property - has a great deal of importance and should not be disturbed by the introduction of a large tank for the storage of sludge.

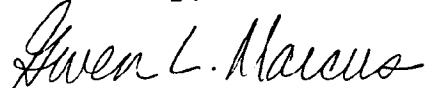
In addition, it is important that the driveways that are located within the environmental setting and which lead to and from the sludge storage facility are not substantially altered. They should retain their rural/farm road character and should not be greatly widened or improved.

To summarize, the proposed sludge storage facility should be located outside of the delineated environmental setting. The operation of this facility must be sensitive to the historic character of the farm - particularly those areas within the environmental setting. Drives and other historic features must not be substantially altered.

It is important to note that any alterations or new construction within the environmental setting must be reviewed and approved by the Montgomery County Historic Preservation Commission before a County building permit for the work can be issued.

Thank you for the opportunity to comment on this project. If you have any questions, please feel free to contact me.

Sincerely,



Gwen L. Marcus
Historic Preservation
Planner

cc: Doug Alexander, Chief, Urban Design
Robert J. Spalding, CPN
Jared Cooper, HPC ✓
Lauren Bowlin, Maryland Historical Trust
Mary Ann Kephart, Historic Medley, Inc.

398

392

407

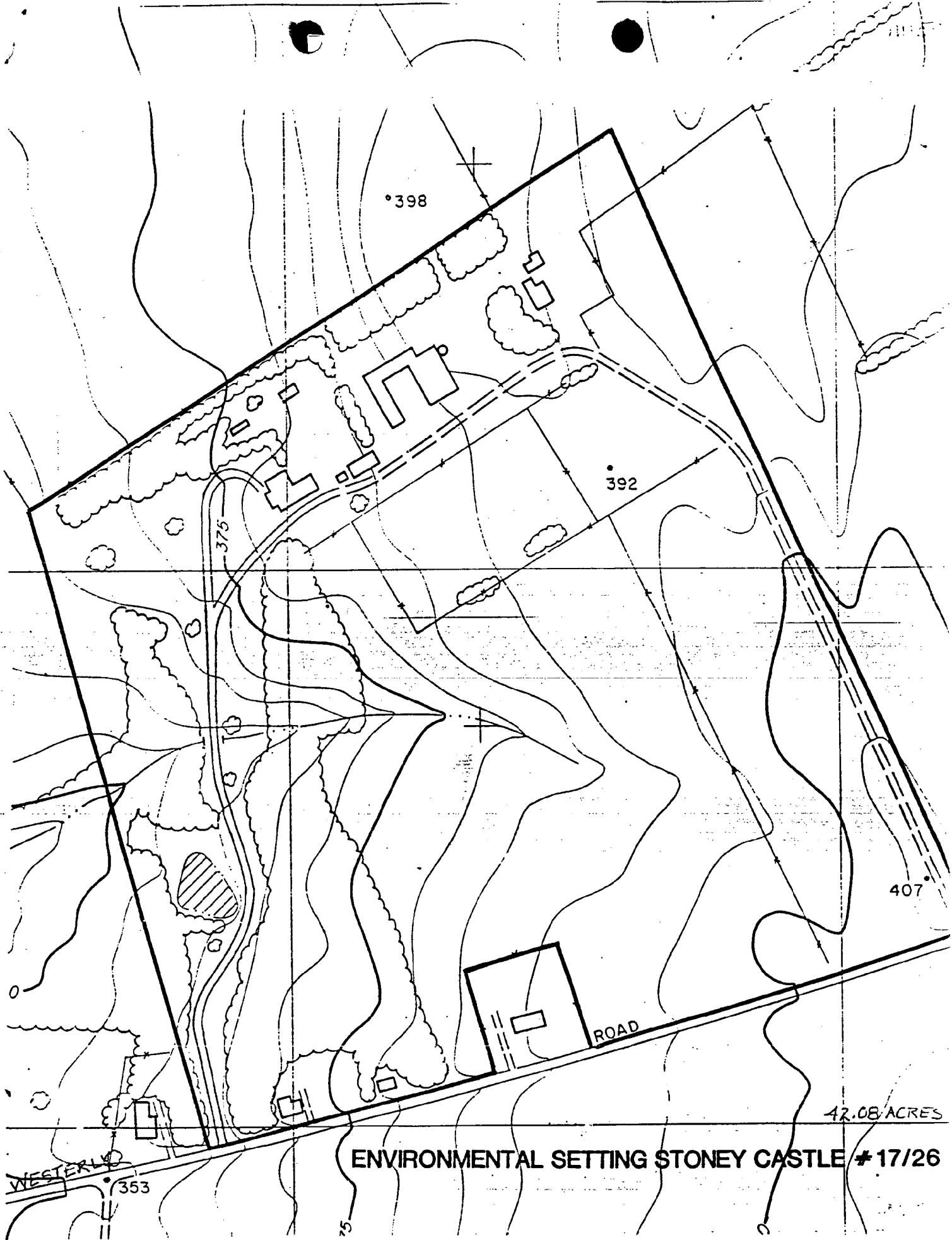
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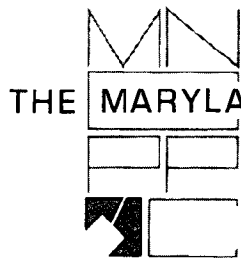
ROAD

42.08 ACRES

ENVIRONMENTAL SETTING STONEY CASTLE #17/26

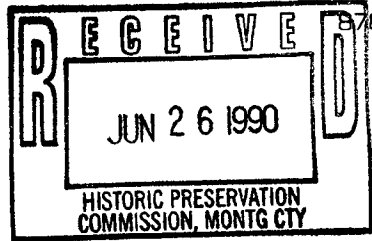
WESTERLY 353





THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

8787 Georgia Avenue • Silver Spring, Maryland 20910-3760



June 22, 1990

#17126

TO: Jared Cooper, Historic Preservation Specialist, HPC
 Gwen Marcus, Historic Preservation Planner, M-NCPPC

VIA: John Matthias, Acting Chief
 Community Planning North Division *John Matthias*

FROM: Robert J. Spalding, Principal Planner *RJ Spalding*

SUBJECT: Spates Farm Sludge Storage Application

Introduction

An application for a permanent 500,000 gallon open air sludge storage facility has been filed with the State Department of the Environment for the Spates Farm in Poolesville. The location plan indicates that part of the project site lies within the environmental setting of the Stoney Castle Historic Site. Therefore, any alterations which require a building permit are subject to Historic Preservation Commission (HPC) review. The following information is provided for your consideration:

The site is zoned Rural Density Transfer (RDT). The RDT Zone explicitly encourages agricultural uses. The storage of sludge for agricultural application is interpreted to be an accessory building or use to the primary agricultural use. Therefore, a Sludge Storage Facility for on-site application would be permitted in the RDT Zone.

Although permitted in the RDT Zone, staff notes that the compatibility of the facility's location and access with the Stoney Castle historic resource must be determined.

Concerns

First, the plan is unclear on the exact location of the improvements in relation to the environmental setting. Second, the location and character of the security fence is not indicated. Third, the site may require stormwater management measures which are not indicated on the plan. Fourth, the access road to be used by the trucks is unpaved with no paving recommended. Fifth, access to the site is by Westerly Road which has only a 15-16 foot-wide paved area, and sixth, the Town of Pooles-

ville and its residents have expressed concerns over the compatibility and safety of the storage tank.

The applicant should submit plans with the detail required to evaluate the impact of the improvements and screening. Storm-water management facilities, if required, should be located outside of the environmental setting. The access road, which is in the environmental setting, will be serving a permanent facility with heavy truck traffic. Typically, the access road should be paved to appropriate standards. However, the historic character may make this undesirable. Therefore, the use of an access route which is paved and outside the environmental setting should be explored. Westerly Road is a 16-foot-wide road which was paved over a "milk road" which typically had a 9-foot-wide concrete mainline and 3-foot slag shoulders on each side. The current road conditions require cars to slow down and pull over slightly to allow for comfortable passing of on-coming cars. On-coming trucks cause even more disruption. The Town of Poolesville shares this concern.

The Town of Poolesville testimony expressed concerns about groundwater impacts from a leak in the storage tank. The site is within one mile of an existing municipal well and within the well's cone of depression. The entire water supply for the Town of Poolesville is from the Piedmont Sole Source Aquifer which covers a large portion of western and northern Montgomery County. The geology of the area is such that contamination of the aquifer can affect a large land area. The Town and staff are concerned that any leaks into the groundwater supply could result in contamination. Contamination could lead to health problems which would be resolved by the extension of public water at a very high cost.

An additional concern raised by the Town is that of odor. Portions of the Town lie downwind of the proposed open air tank. Residents have expressed skepticism over the applicant's claim that the odor can be controlled. While not taking a position on the potential odor, staff notes that other agricultural uses do produce odors of a sufficient magnitude to generate complaints from nearby developed areas. The County has traditionally attempted to provide adequate buffers, such as parks or low density housing to minimize conflicts between developed and agricultural areas. The Functional Master Plan for Agricultural Preservation recognized the importance of the Piedmont Sole Source Aquifer and encouraged its protection. The Plan also recognized the value of sludge in agricultural production but does not specifically address sludge storage facilities.

The public hearing record will remain open until the close of business on July 13. As explained by representatives of the State Department of the Environment, the record of the public hearing is used to determine whether any conditions should be placed on operations, rather than approval or denial. A recommendation for denial can be based on incomplete application, failure to pay fees, or a demonstrated record of non-compliance.

Attachments

SLUDGE MEMO

ATTACHMENTS (8)

FACT SHEET

Proposed Storage Facility - Spates Farm

One Mast-Lepley concrete storage facility would be constructed on the Spates farm to provide storage of the Seneca and Damascus Wastewater Treatment Plant sludges, when site conditions do not permit the direct application of sludges.

Sludge Production

- . Seneca WWTP 720 dry tons/year
- . Damascus WWTP 144 dry tons/year

- . TOTAL 864 dry tons/year

Contract Storage Requirement

- . 150 dry tons/year = storage for 90 days sludge production

Proposed Facility Storage Capacity

- . 200 dry tons (with 12" freeboard)
- . Dimensions = 90' in diameter, 12' deep

Utilization of Stored Sludge

- . The stored sludge will be land applied at agricultural rates to the Spates farm and possibly other permitted farms. The average corn application rate for these sludges is 2.7 dry tons/acre. If the maximum quantity of sludge was stored, approximately 75 acres would be utilized in cleaning out the storage facility. We currently have 413 acres permitted for land application in Montgomery County. Since a majority of the sludge will be stored in the winter months, Bio Gro anticipates cleaning out the facility once a year in the spring.

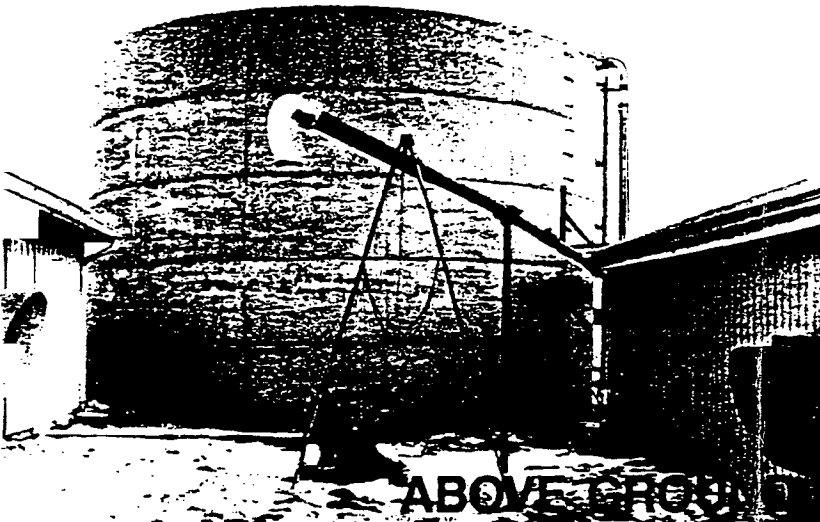
Transportation

- . Sludge will be transported by totally enclosed and sealed tanker trucks. Truck traffic to the facility would average one to two trucks per day during periods of storage.



Sludge Management · Specializing in Beneficial Use

PROPOSED FACILITY



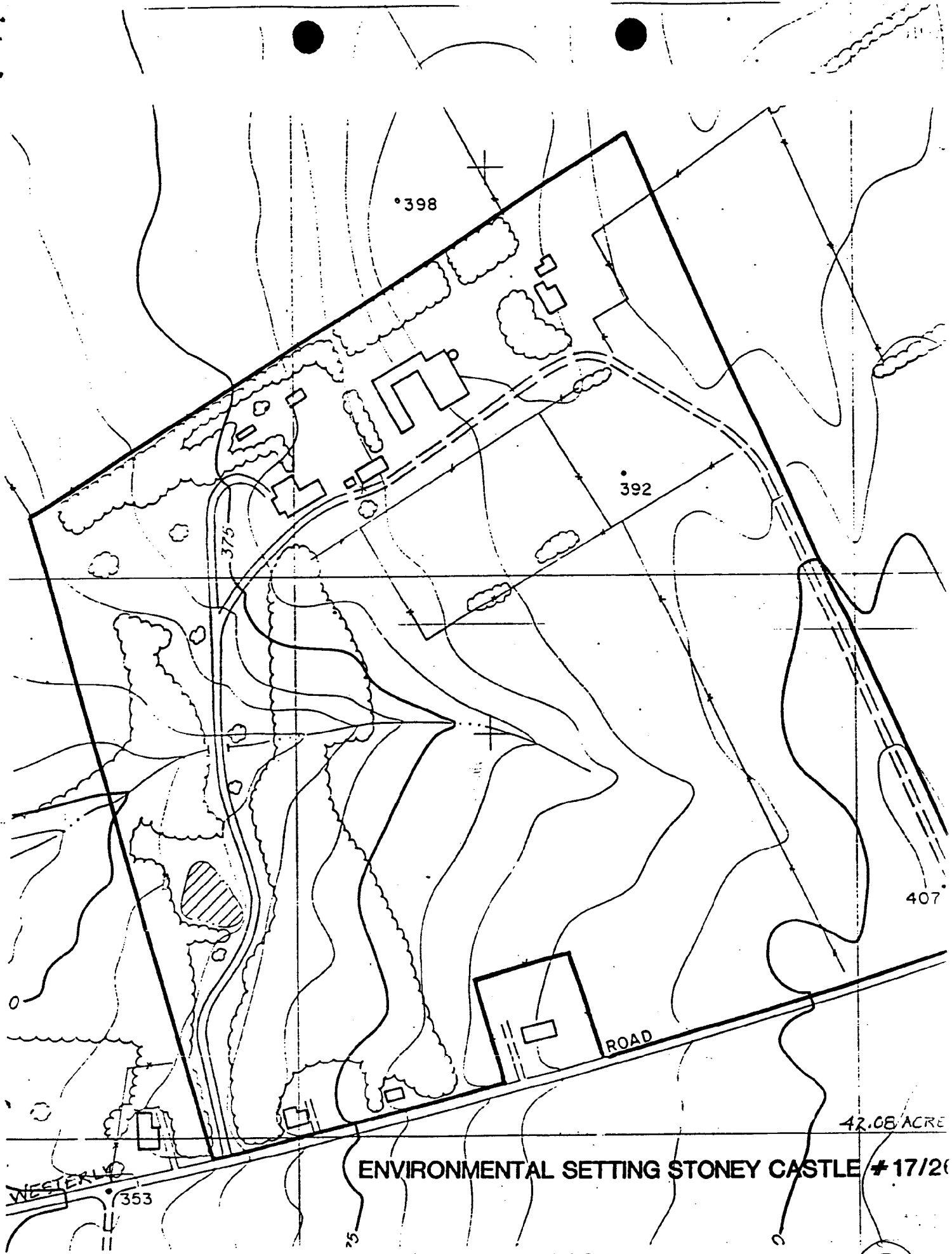
Satisfied Customers

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Myron Ramseyer - Sterling, Ohio
Steiner Farm - Seville, Ohio
Jim Winkler - Sterling, Ohio

★ *Soil Conservation Service Approved*

★ **MAST-LEPLEY SILO, Inc.**

1088 N. Apple Creek Rd., Wooster, Ohio 44691
(216) 264-9292



42.08 ACRES

ENVIRONMENTAL SETTING STONEY CASTLE #17/20

NOT TO SCALE

3

U.S. DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE COLLEGE PARK, MARYLAND	SILY FENCE	DRAWING NUMBER: SP-1
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LOCATION PLAN

1" = 600'



BY ASSOCIATES INC.
 AND SURVEYORS
 PICE BUILDING
 2077E

0

DRAWING NO.

TITLE

SITE PLAN

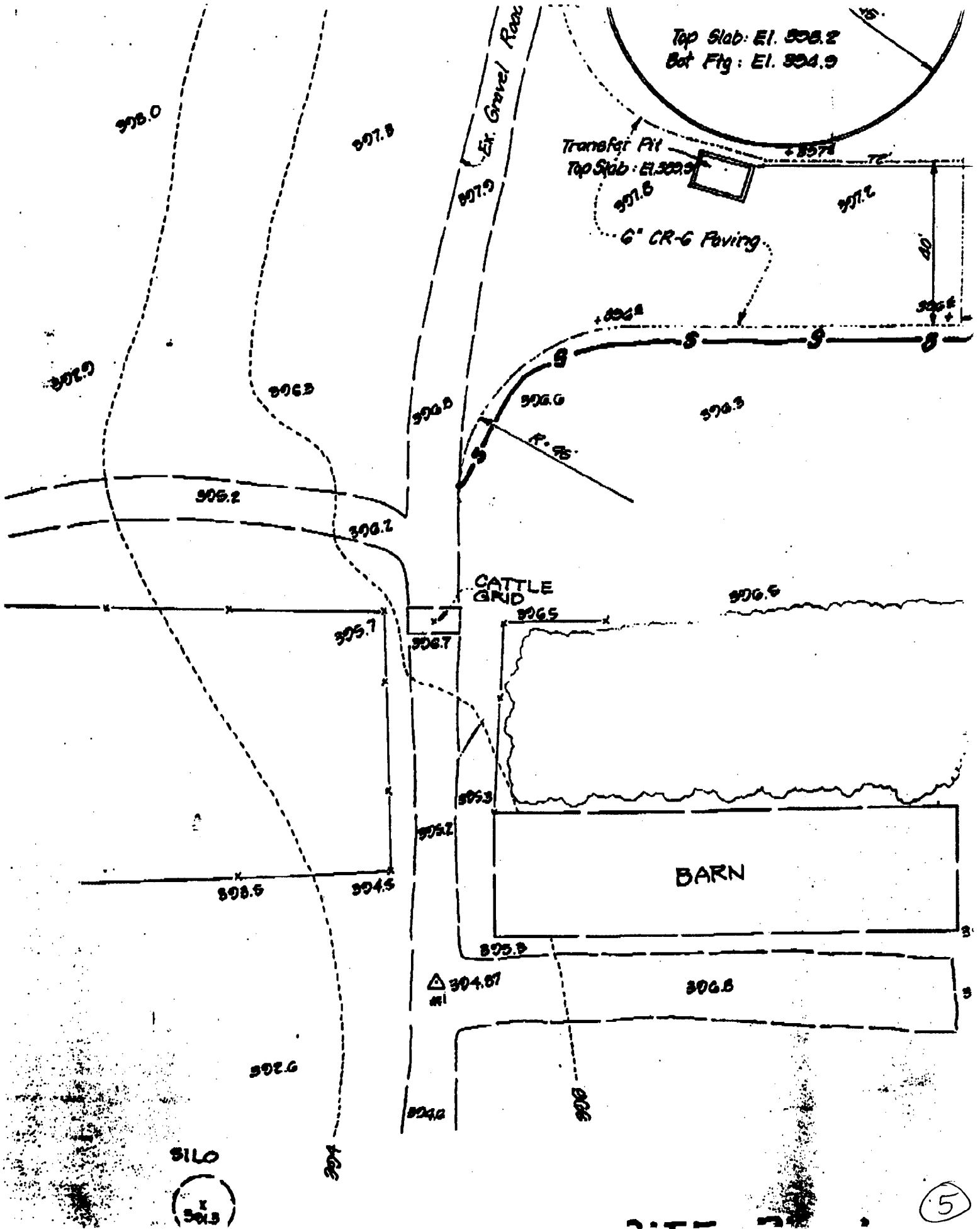
FOR LAND APPLICATION OF SLUDGE TO THE PROPERTY OF

ALFRED W. SPATES, et al.

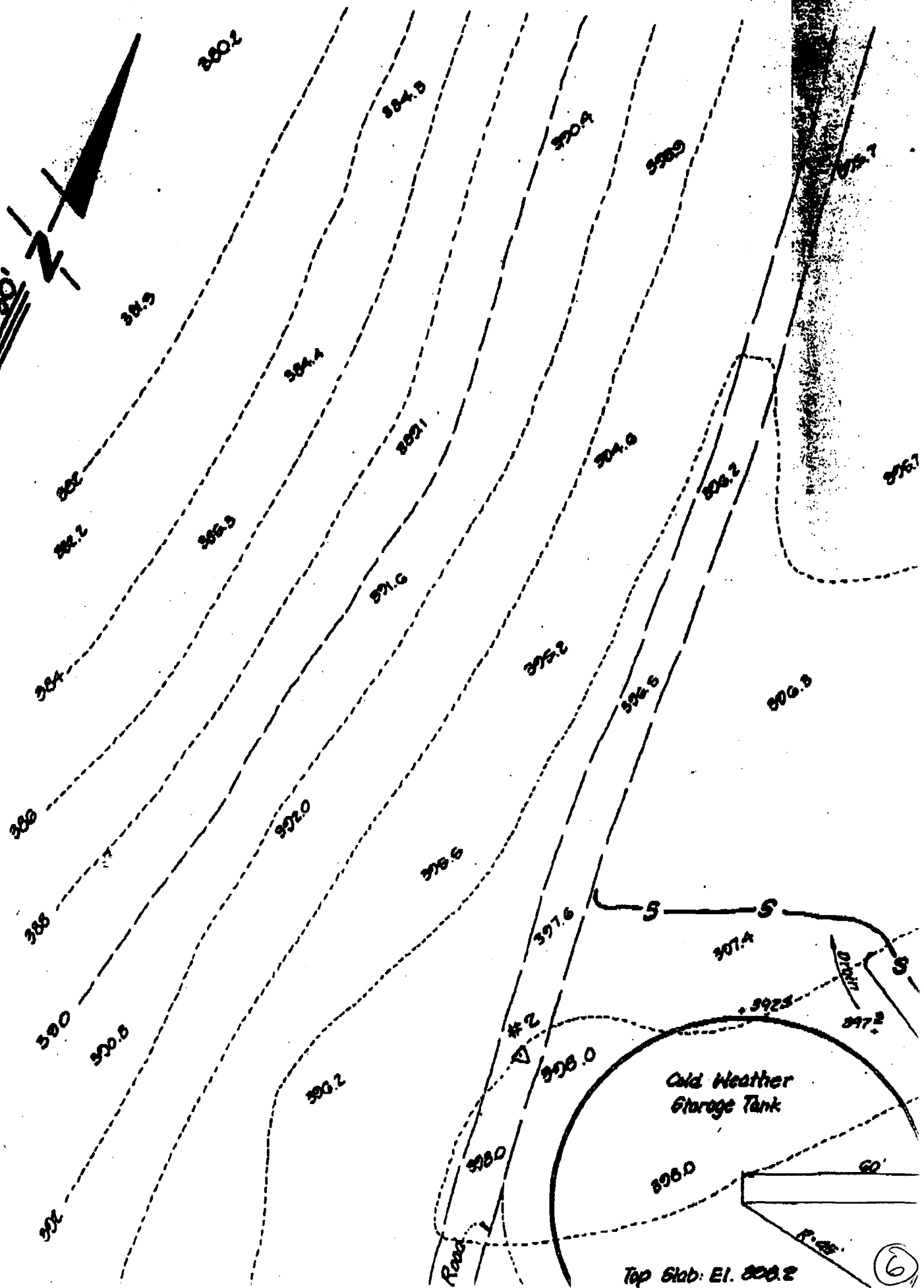
LIBER 4681 AT FOLIO 810 of 800.

THIRD ELECTION DISTRICT

MONTGOMERY COUNTY, MARYLAND



SCALE: 1" = 20'



Top Slab: El. 298.2

6

Planning Board Staff Public Hearing Testimony
Spates Farm Sludge Storage Application

June 13, 1990

GOOD EVENING, FOR THE RECORD MY NAME IS ROBERT SPALDING. I AM REPRESENTING THE MONTGOMERY COUNTY PLANNING DEPARTMENT STAFF.

THE PLANNING DEPARTMENT STAFF HAS CONCERNS REGARDING THE IMPACT OF THE PROPOSED SLUDGE STORAGE FACILITY ON THE SPATES FARM IN POOLESVILLE. THE STONEY CASTLE AND ITS 42 ACRE ENVIRONMENTAL SETTING IS DESIGNATED ON THE MONTGOMERY COUNTY MASTER PLAN OF HISTORIC PLACES. THE STONEY CASTLE IS THE 1831 HOUSE LOCATED ON THE SPATES FARM.

THE PROJECT SITE BOUNDARY SHOWN ON THE LOCATION PLAN OVERLAPS A PORTION OF THE "ENVIRONMENTAL SETTING" OF THE STONEY CASTLE SITE. IT IS ALSO NOTED THAT ACCESS TO THE SITE IS THROUGH THE ENVIRONMENTAL SETTING. AS SUCH, APPROVAL BY THE HISTORIC PRESERVATION COMMISSION (HPC) IS REQUIRED FOR IMPROVEMENTS WITHIN THE ENVIRONMENTAL SETTING. AT THIS POINT, APPROVAL FROM THE HISTORIC PRESERVATION COMMISSION HAS NOT BEEN SOUGHT.

IT IS THE OPINION OF THE STAFF THAT, STATE APPROVAL OF THE SLUDGE STORAGE APPLICATION WOULD BE PREMATURE WITHOUT THE APPROVAL OF THE HISTORIC PRESERVATION COMMISSION. THEREFORE, WE REQUEST THAT THE RECORD BE HELD OPEN UNTIL SUCH APPROVAL IS RECEIVED. IF THE STATE SEEKS TO APPROVE THE REQUEST PRIOR TO HPC

APPROVAL, THE RECORD SHOULD BE HELD OPEN FOR 30 DAYS SO THAT THE HPC CAN COMMENT ON THE APPLICATION.

IN ADDITION TO THESE COMMENTS, THE STAFF WILL SUBMIT ADDITIONAL TESTIMONY TO THE HEARING EXAMINER IN WRITING.