

Neal Wilson



Neal Wilson MPCA Municipal Division 520 Lafayette Rd. St. Paul, MN 55155

651/296-8595

Neal.Wilson@PCA.State.MN.US



WFB Characteristics

WFB is from groundwater

Generation rates vary

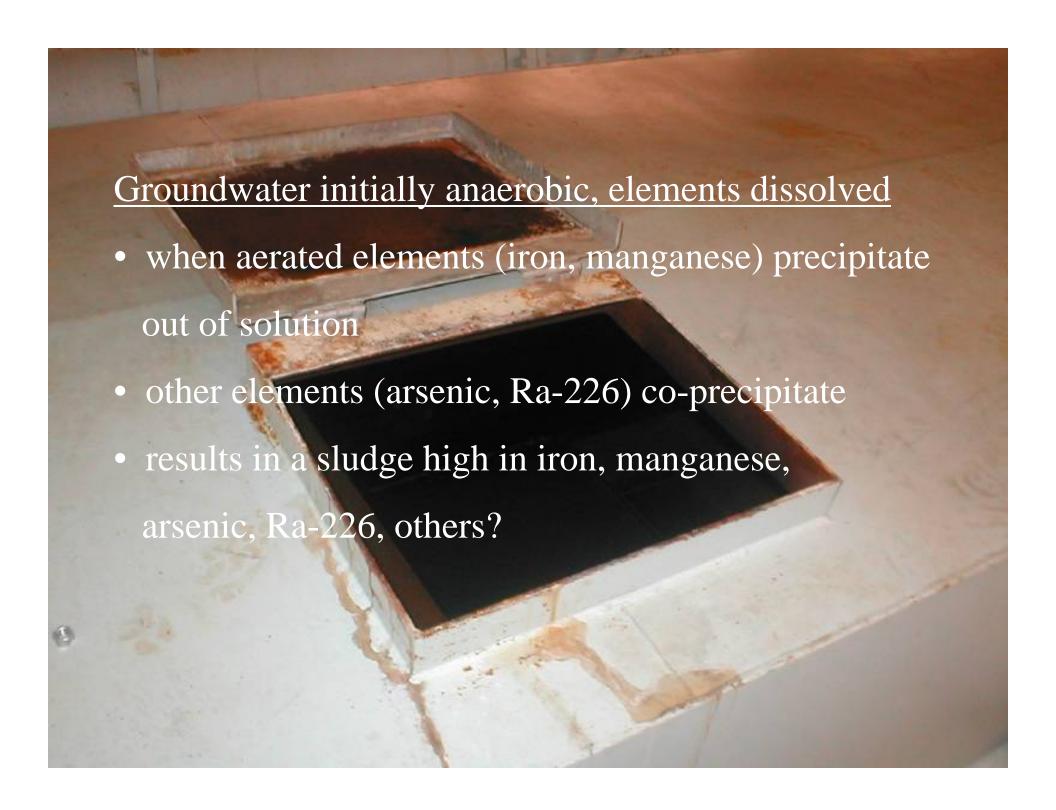
 Most likely high in colloids (clay), iron and manganese

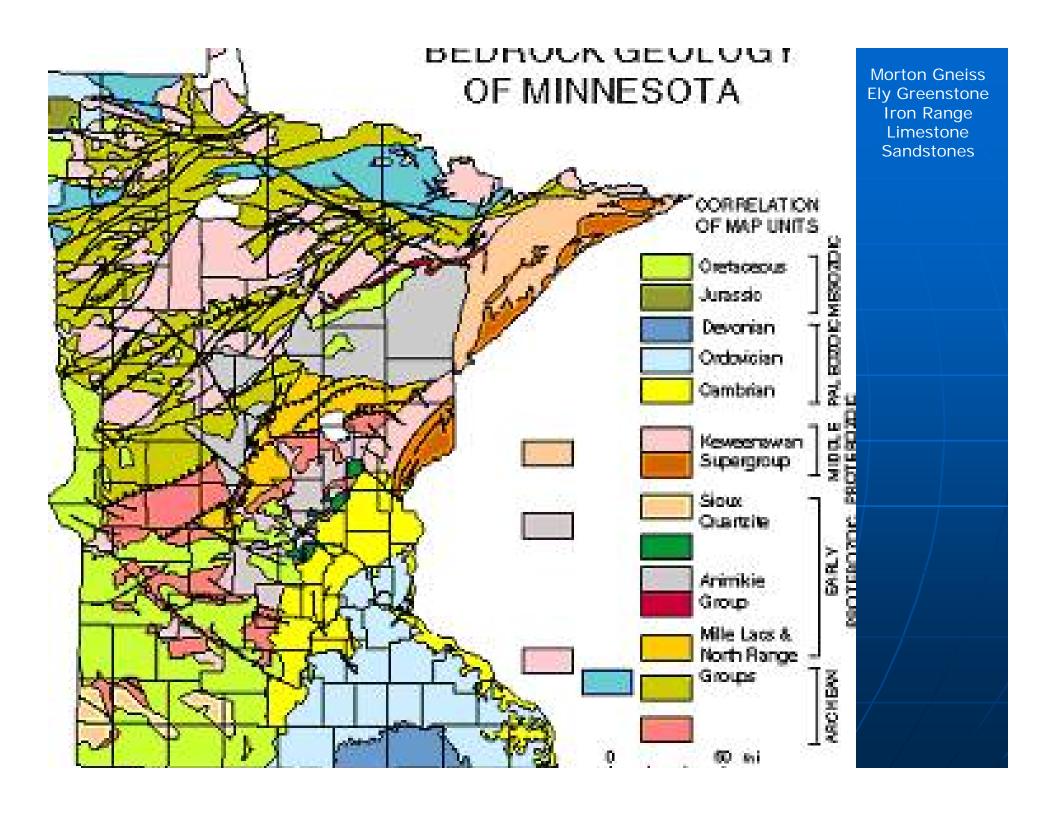
 May contain elevated levels of arsenic and Ra 226

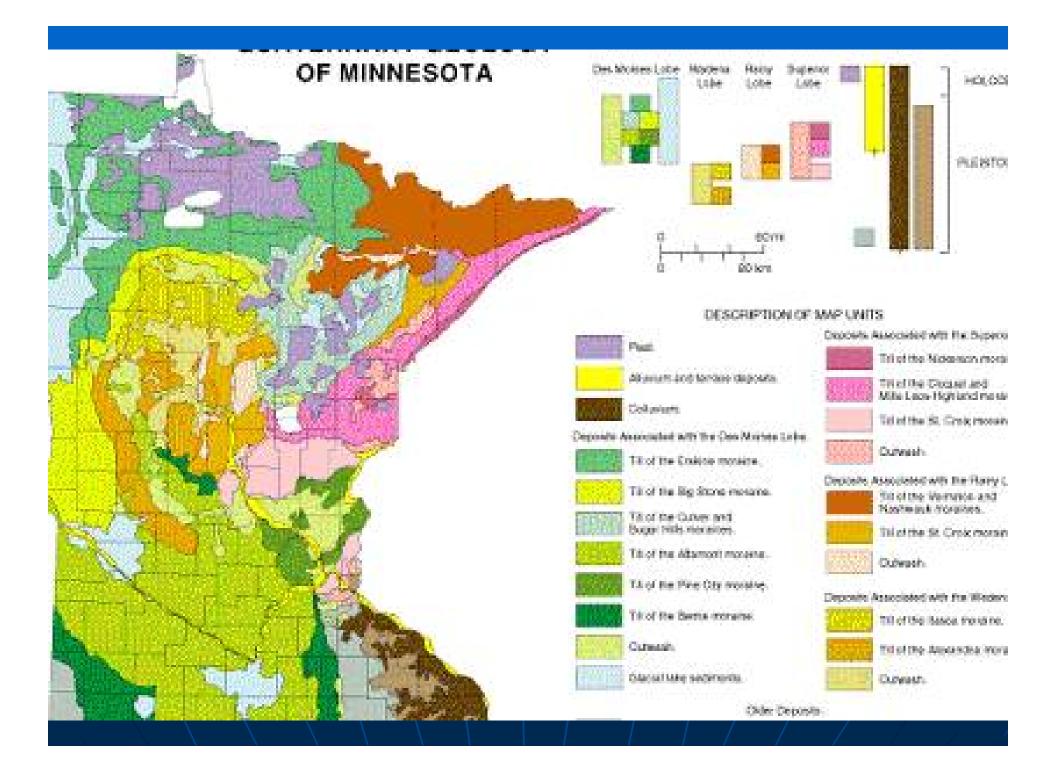
Other COC?



















Involves Water Quality and Solid Waste

- Minnesota Estimate:
 - At least 35 under NPDES MNG64 general permit (permit expires 7/07)
 - At least 15 MN00 individual permits
- WFB is defined as a solid waste: MR 7035.0300 Subp. 100: "Solid waste" means garbage, refuse, sludge from a water supply treatment plant...



Liquid and solids both to a WWTF

Liquid and solids both to a pond

 Liquid to a WWTF, solids to a pond (or opposite)

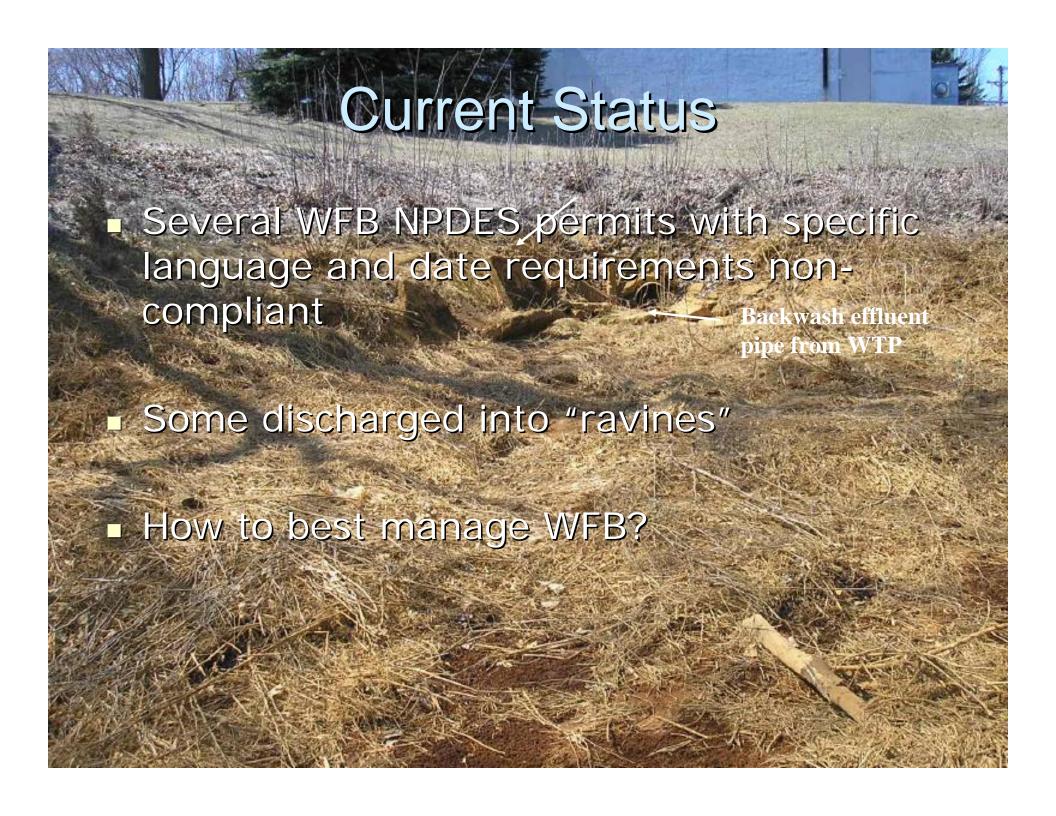
- Solids: to a WWTF, a landfill, land application, or construction fill

Pond Solids Cleanout

 Frequency of pond cleanout related to volume of water, TSS and TDS

 Some cleaned out every year, some only every 20 years





Proposed WFB Management Options

Landfill

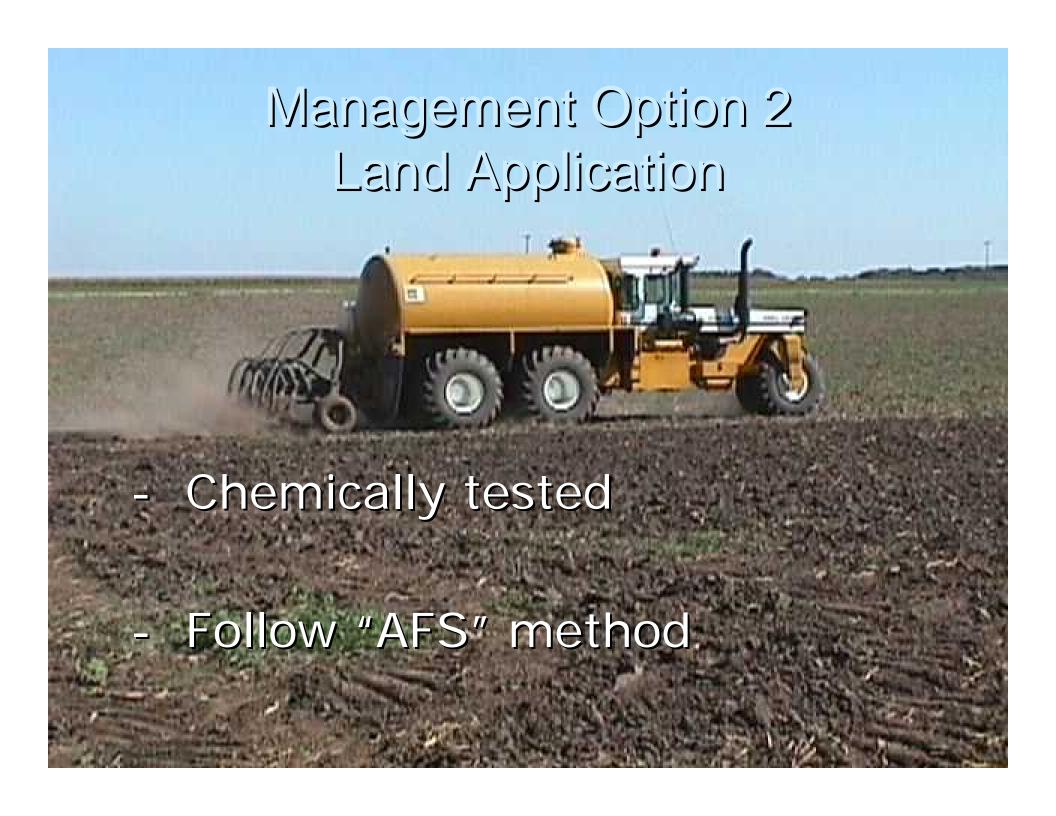
Land application

Through to a WWTF

Construction fill

Management Option 1 Landfilling

- Pass the paint filter test
- Chemically tested, compared to standards in the ISWMP
- Un-lined LF's Ra-226 < 5 pCi/g lined LF's Ra-226 < 30pCi/g</p>





Determine maximum land application rate

Possible Limits:

- Biosolids (soil) cumulative limits
- MPCA Tier I Soil Leaching Values
- MPCA Tier I Soil Reference Values
- Others?

---Use most restrictive, calculated limit---

DRAFT Acre Furrow Slice Arsenic Calculation

■ AFS = top 6" topsoil = 2,000,000 lb/acre

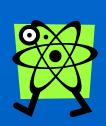


<u>exp. Arsenic</u>: **SRV** = 5 mg/kg; 5 mg/1 kg = X mg/909,091 kg; X = 4,545,455 mg/acre allowable;

4.54 kg * 2.2 lb/kg = 10 lb./acre (note: Biosolid As limit is 37 lb/acre)

Exp.: Arsenic in sample = 269 ug/g = 0.000269 g/g; SRV = 10 lb/A; [(10 lb/A)/0.000269 lb./lb.)]= 37,175 lb/A

37,175 lb./A maximum of <u>dry</u> RRRWS backwash that can be land applied if using the SRV



Acre Furrow Slice Ra-226 Calculation

MDH proposed standard = 5 pCi/g = 5000 pCi/kg; [(5000 pCi/kg) = (X kg/909090 kg/A)]; X = 4,545,455,000 pCi/acre

Proposed MDH AFS limit = 4,545,455,000 pCi/A

Exp.: Ra-226 = 29 pCi/G = 29000 pCi/kg; [4,545,455,000 pCi/ 29000 pCi/kg] = 156,739 kg/A;

[(156,739 kg)(2.2 lb/kg)] = 344,827 lb/A (dry weight)

[(344,827 lb)/(2,000 lb/ton)]/[(0.15*)] = 1,149 tons (wet weight)



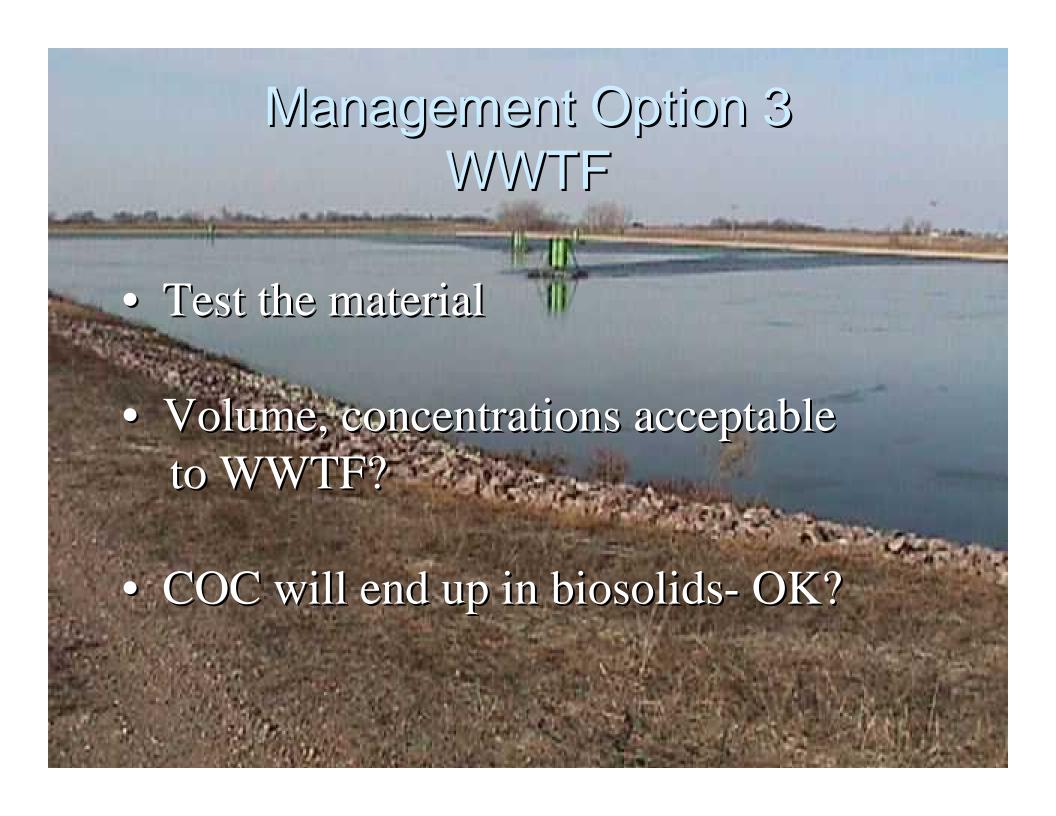
Formulas Used to Determine Cumulative Limits

DRAFT

Arsenic maximum cumulative application (dry tons/acre) 37 lb/acre ÷ (arsenic conc. (mg/kg) x 0.002)

Ra-226 maximum cumulative application (dry tons/acre) 4.5 milliCi/ac ÷ (radium 226 conc. (pCi/g) x 0.0009)

The maximum allowable WFB application is the lesser of the two results above minus any amount applied to the site from previous applications.



Use as Construction Fill



- Test the WFB for analytes
- Use AFS method
- Use limits table (directly)
- Calculate maximum amount of fill to stay under the limits

MPCA WFB Guidance

Is being drafted

Will address

- Testing requirements
- Management options
- Reporting requirements

May only require testing, management of As and Ra-226



Summary and Conclusions

In Minnesota, WFB is a solid waste

WFB management will be delegated to NPDES permits

 Need to finalize land application limits, testing parameters

