

Adams seeks conservation, waste plans for sludge

BY J.B. ROTH
GETTYSBURG — If the Adams County Conservation District, the Soil Conservation Service, and the Planning Commission have their way, farmers using municipal sludge will have to have a conservation plan and have a waste management plan prior to applying sludge on their fields.

The issue came to a head as a result of four Gettysburg Municipal Authority sludge disposal permit applications for Mt. Joy Twp. that were submitted to the Planning Commission. Planning Director John I. Callenbach and the county commissioners adopted a policy allowing a 30-day waiting period

for public comments on proposed disposal sites. The policy prior to August was to make a "no comment" to the Department of Environmental Resources. The county was concerned that the future may hold problems if the commission did not take every precaution to insure that it was acting responsibly.

The four authority applications were reviewed by the commission in September. Callenbach commented that all of the areas intended for disposal were adjacent to a body of water, three were in the Lake Heritage subdivision, a private community near Gettysburg. Callenbach said the sites drained directly into the lake.

Callenbach noted that sludge disposal was a sensible and beneficial agricultural technique if handled correctly, but could cause problems if handled incorrectly. The Lake Heritage Property Owners' Association and their attorney contacted Callenbach and raised concerns. They also sent a letter to DER asking that the permits be denied.

As a result of the comments Callenbach consulted with the SCS and the Conservation District for advice. The result was a letter drafted to Robert G. Benven facilities supervisor of the Bureau of Solid Waste Management.

The letter requested the DER deny the permits unless a conservation farm plan is in force at the site. The plan would require a waste management element and monitoring procedure.

"There is no requirement in the DER sludge permitting system pertaining to agricultural sludge disposal. There are not requirements for conservation plans. We just feel that it should go farther than that. There should be a specific document or plan put together by somebody that knows what they are doing. There really is no reason why sludge shouldn't be applied to agricultural and is basically a management and operations problem," Callenbach said.

In essence, what this might mean, not only for farmers in Adams County, but possibly statewide, is that if DER goes along with Adams County's request, a precedent could be set for similar requirements throughout the state. The ultimate decision would still lie with the township authority, but many local townships are disturbed by their inability to control sludge disposal. The alternative could be that a township might try to prohibit or possibly establish their own permitting procedures.

Callenbach said that the increasing demand for sludge and the construction of new municipal sewers will increase the number of farming operations utilizing sludge. It is the contention of the commission that the disposal be a well-planned and operated program.

Callenbach said he did not know how DER would react considering that they are in the process of reviewing regulations and plus the conservation District's stance that disposal should be regulated. DER may be favorable to the plan, he said.

Soil Conservation Director Ray Voyer said there were two possible ways the system could work. One way would be to complete a conservation plan for the soil, water conservation, and waste management. The alternative would be to require only the waste management plan. He said that he favored a total plan because of the severe soil erosion problems in South Central Pennsylvania.

Voyer said the Planning Commission was requesting the change in its memorandum of understanding to include this new stance. As a gentlemen's agreement, the actual technical assistance will be requested by the conservation district on behalf of a local farmer. The conservation plan will then be developed by SCS.

The resource management system would allow the farmer and local authorities to be assured that the proposed application of sludge appropriate. The service would be free.

The system would allow a township, to forward the application to the Conservation District for review. Then the Districts recommendation could be accepted or ignored by the township.

"The reason we should be in-
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