

How to Survive an EPA Audit

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Why Would I be Audited?

- Complaints
- Public perception
- Competition
- EPA becomes proactive







How do I Know I am Being Audited?

- An unscheduled visit from the local health department or state environmental agency
- Receive a CWA section 308 letter from EPA

What is a 308 Letter?

- A request for information
- Maximum of 5 years worth of records
- Failure to comply escalates to further enforcement

Records Requested

1] The location of the site where domestic septage is applied, either the street address, or the longitude and latitude of the site (available from the U.S. Geological Survey maps).

2] The number of acres to which domestic septage is applied at each site.

Site 1
10 acres

Site 3
6 acres

Site 2
8 acres

John's Septage
Disposal Sites
100 Farm Street
Louisville

Record Requested (cont.)

3] The nitrogen requirement for the crop or vegetation grown on each site during the year, including the expected annual crop yield(s) used to establish the nitrogen requirement.

Determining the Allowed Annual Rate for Applying Domestic Septage to Non-Public Contact Sites

$$\text{Annual Application Rate (gallons/acre/year)} = \frac{\text{Annual Pounds of Nitrogen Required for the Crop and Expected Yield}}{0.0026}$$

NON-PUBLIC CONTACT SITES INCLUDE AGRICULTURAL LAND, FORESTS, AND RECLAMATION SITES.

Record Requested (cont.)

4] The date of each domestic septage application.

5] The gallons of septage which are applied to the site during the specified 365-day period.

6] A certification statement.

Certification Statement

”I certify under penalty of law, that the information that will be used to determine compliance with the pathogen requirements in [*insert either 503.32(c)(1) or 503.32(c)(2)*] and the vector attraction reduction requirements in [*insert 503.33(b)(9), 503.33(b)(10), or 503.33(b)(12)*] was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.”

Record Requested (cont.)

7] A description of how the pathogen requirements are met for each batch of domestic septage that is land applied.

Pathogen Compliance

- Lime or no lime
- Harvesting restrictions
- Grazing restrictions
- Public access

Record Requested (cont.)

8] A description of how the vector attraction reduction requirement is met for each batch of domestic septage that is land applied.

Vector Attraction Compliance

- Injection
- Incorporation
- pH adjustment

Record Requested (cont.)

9] If using lime, records that indicate the pH requirements were met and bulk lime receipts.

pH Definition

40 CFR 503.31(g)

pH mean the logarithm of the reciprocal of the hydrogen ion concentration measured at 25° Centigrade or measured at another temperature and then converted to an equivalent value at 25° Centigrade.

pH Correction Formula

$$\text{pH}_{\text{meas}} + \text{pH}_{\text{cor}} = \text{pH}_{25^{\circ}\text{C}}$$

where:

$$\text{pH}_{\text{cor}} = \frac{0.03 \text{ pH units}}{1.0^{\circ}\text{C}} \times (\text{Temp } ^{\circ}\text{C}_{\text{meas}} - 25^{\circ}\text{C})$$

Domestic Septage Regulatory Guidance

A Guide to The EPA 503 Rule

http://www.epa.gov/owmitnet/mtb/biosolids/septage_guide.pdf

APPENDIX C-1

EXAMPLE RECORD KEEPING OF GENERAL INFORMATION

SITE: _____
 REPORTING YEAR: _____
 FIELD NUMBER: _____
 CROP(S) and EXPECTED YIELD: _____

NITROGEN REQUIREMENT OF CROP: _____ pounds N per year
 ANNUAL APPLICATION RATE (AAR): _____ gallons per acre per year

$$\text{AAR (gallons/acre/year)} = \frac{\text{Nitrogen Requirement of Crop}}{0.0026}$$

HARVESTING SCHEDULE: _____

DATE OF APPLICATION TO SITE	ACREAGE OF SITE TO WHICH SEPTAGE WAS APPLIED	GALLONS APPLIED TO SITE TODAY	TOTAL GALLONS APPLIED YEAR TO DATE

I certify under penalty of law, that the pathogen requirement [*insert alternative 1 or 2*] and the vector attraction reduction requirement [*insert alternative 1, 2 or 3*] have/have not [circle one] been met. This determination has been made under my direction and supervision in accordance with the system designed to assure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature: _____

Printed Name: _____ Title: _____

Driver: Ed Warren

Source	Date	Amount of Septage (Gallons)	Type of Alkaline Material Used	Amount of Lime (pounds)	How Mixed	Initial pH	pH after 30 min.	How Applied & Site/Field/Crop
H. Toms 2331 Webster Camp Springs	7-8-93	2000	hydrated lime	50	slurry bled	12	12	Babett East Hwy 2 Corn 100 bu, plow Camp Springs, MD
Grease Trap at Mel's Diner	7-8-93	300	N O N E					County Landfill
P. Saul 2335 Webster Camp Springs	7-9-93	1500	hydrated lime	35	slurry bled	12	12	Babett East Hwy 2 Corn 100 bu, plow Camp Springs, MD
Napier Apts. Camp Springs	7-9-93	3500	hydrated lime	85	slurry bled	12	12	Babett East Hwy 2 Corn 100 bu, plow Camp Spring, MD

Develop a Standard Operating Procedure (SOP)

- Discussion with farmer
- Speed of truck
- Addition of lime
- pH sampling
- Calibration of pH meter
- Temperature correction

Develop a Standard Operating Procedure (SOP)

- Flagging of site or GPS
- Storage
- Weather conditions
- Recordkeeping
- Certification
- Training of staff

Septage Enforcement Actions

2/08

State	308 Requests	Penalty Orders
Illinois	13	10
Indiana	4	1
Michigan	11	9
Minnesota	7	5
Ohio	29	16
Wisconsin	25	14



**Some
Basic
Helpful
Hints**

Your fun and easy guide to Septage
Recycling Management Options



FREE daily eTips at
dummies.com

Septage Recycling FOR DUMMIES®

**A Reference
for the
Rest of Us!**

Improve Septage
Recycling for max
benefits – details
inside



Doug Lowe

Author of Office XP For Dummies
Quick Reference

**Read
a
good
book**

Domestic Septage Regulatory Guidance

A Guide to The EPA 503 Rule

http://www.epa.gov/owmitnet/mtb/biosolids/septage_guide.pdf

**Always look where
you're going !**



**Always Spell – Check
your work.**



Avoid Bad Habits



Thank You



The End