### 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

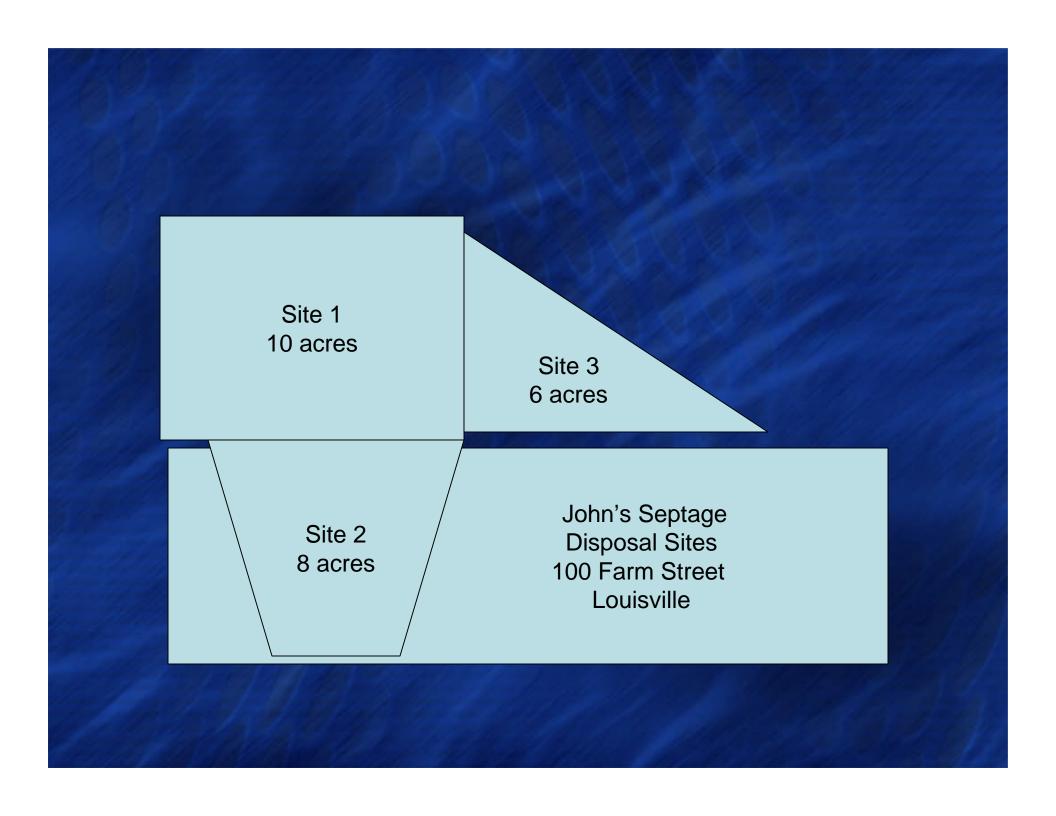
• Maximum of 5 years worth of records

• 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.



#### 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

Annual Application Rate (gallons/acre/year)

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

$$pH_{meas} + pH_{cor} = pH_{25^{\circ}C}$$

where:

$$pH_{cor} = 0.03 pH units \times (Temp °C_{meas} - 25 °C)$$
  
1.0 °C

#### Domestic Septage Regulatory Guidance

A Guide to The EPA 503 Rule

http://www.epa.gov/owmitnet/mtb/biosolids/septage\_guide.pdf

#### EXAMPLE RECORD KEEPING OF GENERAL INFORMATION

SITE: REPORTING YEAR: FIELD NUMBER: CROP(S) and EXPECTED YIELD:						
NITROGEN REQUIREME ANNUAL APPLICATION	ENT OF CROP:F	and the same of th	ons per acre per year			
AAR (ga	llons/acre/year) = Nitro	ogen Requirement 0.0026	of Crop			
HARVESTING SCHEDU	LE:					
DATE OF APPLICATION TO SITE	ACREAGE OF SITE TO WHICH SEPTAGE WAS APPLIED	GALLONS APPLIED TO SITE TODAY	TOTAL GALLONS APPLIED YEAR TO DATE			
ector attraction reduct een met. This determing with the system design afformation used to det equirements have been it	of law, that the pathogen recipion requirement finsert alternation has been made under led to assure that qualified ermine that the pathogen rect. I am aware that there are of fine and imprisonment.	native 1, 2 or 3] had my direction and some personnel properly equirements and ve	eve/have not [circle one] upervision in accordance gather and evaluate the ctor attraction reduction			
rinted Name:		Title:				

ver:								
Source	Date	Septage Amt. (Gallons)	Type of Alkaline Material Used	Amount (pounds)	How Mixed	Initial pH	pH after 30 Minutes	How Applied & Site/Field/Crop

APPENDIX C-2

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	NONE					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



## Septage Recycling DIMMIES

A Reference for the Rest of Us!

**Doug Lowe**Author of Office XP For Dummies
Ouick Reference

Improve Septage
Recycling for max
benefits – details
inside

# Read a good book

#### Domestic Septage Regulatory Guidance

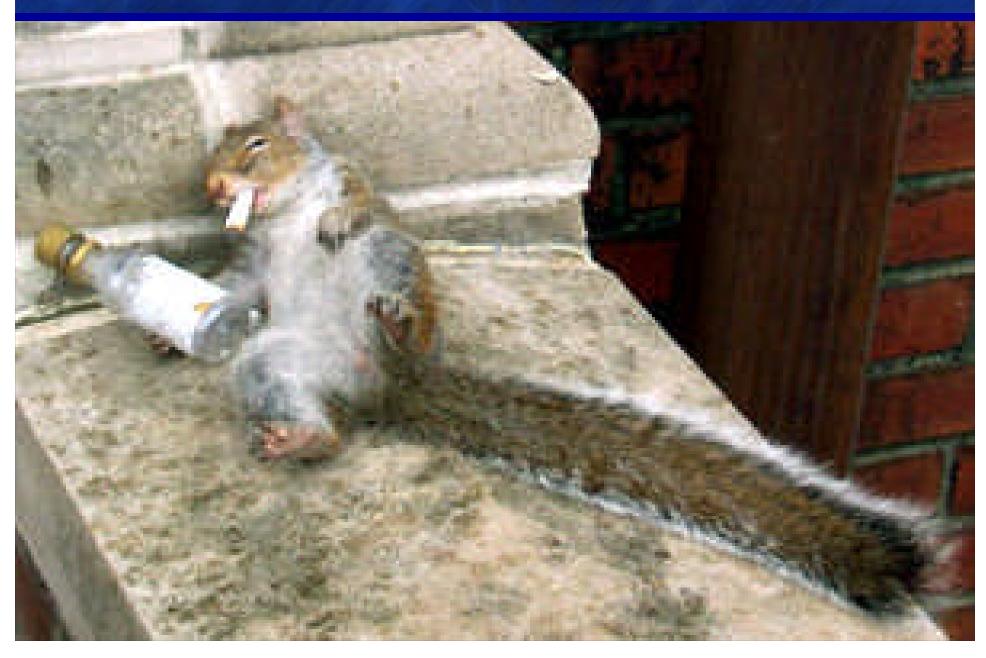
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#### **Avoid Bad Habits**





## The End