



State of Ohio Environmental Protection Agency

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June 4, 2009

Mayor and Council
City of Gallipolis
518 Second Ave.
Gallipolis, OH 45631

Re: Sewage Sludge Compliance Evaluation Inspection

On April 28, 2009, Ohio EPA representatives Jacob Howdyshell and Dan Messerly conducted an inspection at the City of Gallipolis Wastewater Treatment Plant (WWTP). The purpose of the inspection was to determine compliance with the Ohio Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. John Westfall, WWTP Superintendent, provided information on sludge operations and record keeping. The inspection included a review of sewage sludge records and completion of the enclosed checklist.

Currently, primary sludge is sent to a 250,000 gallon heated anaerobic digester for treatment, then to a 275,000 gallon unheated anaerobic digester for further digestion before being sent to one of nine 19'x82' sand drying beds. When dry enough to be moved, the sewage sludge is stacked on a 25'x40' sand bottom storage pad before being removed for land application. For pathogen reduction requirements, seven samples of the dried sewage sludge are tested for fecal coliform to show that the geometric mean of the seven samples is less than 2,000,000 most probable number per gram or colony forming units per gram. For vector attraction reduction, total solids are measured and shown to be greater than 75% for sewage sludge containing no unstabilized solids.

During the inspection, the following violations were found:

- OAC 3745-40-04(D) states that "Bulk sewage sludge shall be land applied at a rate that is equal to or less than the agronomic rate except as provided for in rule 3745-40-07 of the Administrative Code."

At the time of my inspection, there were no records available to show that agronomic rates were being calculated for each land application site. Agronomic rates shall be calculated for each land application site before land application of sewage sludge to that site.

- OAC 3745-40-04(E) states that "A permittee who generates bulk sewage sludge shall provide a label or information sheet to...the owner or lease holder of the land upon which the bulk sewage sludge is land applied. Such label or

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

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information sheet shall provide all notices and information necessary to comply with the requirements of this chapter including the following:

- 1) The name, address, telephone number, and NPDES permit number of the permittee;
- 2) A statement that the material is or contains a byproduct of wastewater treatment;
- 3) A statement that the Ohio EPA, division of surface water, may be contacted at 1-877-644-2001;
- 4) The concentration of total Kjeldahl nitrogen, ammonia nitrogen, total phosphorous, and total potassium of the sewage sludge in milligrams per kilogram (dry weight basis);..."

At the time of my inspection, all of this information was not being given to the landowner where sewage sludge application was occurring. This information shall be developed and provided to all end users/land owners.

- OAC 3745-40-04(H) states that "The permittee shall post signs at sites where class B sewage sludge is land applied. The signs shall read "NOTICE: CLASS B SEWAGE SLUDGE HAS BEEN APPLIED TO THIS SITE." Such signs shall include the name of the permittee and the permittee's telephone number. Such sign(s) shall be posted within twenty-five feet of an obvious access point(s) and shall be unobstructed from view. Any authorized site with road frontage shall have at least one sign facing the road, within twenty-five feet of the road when possible, and shall be unobstructed from view. The text shall be in black capital letters on a white background and the letters shall be one inch in height. At sites with a low potential for public exposure, such signs shall be in place from the time land application begins to a minimum of thirty days after the termination of land application activity at the site. At sites with a high potential for public exposure, such signs shall be in place from the time land application begins to a minimum of one year after termination of land application activity at the site."

At the time of my inspection, the above mentioned signs were not in place at application sites when land application was occurring. Signs must be developed and placed at all land application sites during land application events in accordance with this rule.

- OAC 3745-40-05(A) states "No person shall land apply sewage sludge if the concentration of any pollutant in the sewage sludge exceeds the ceiling concentration for that pollutant established in paragraph (F) of this rule."

During my inspection, it was stated that sewage sludge containing molybdenum above the ceiling concentration had been land applied during the previous year. The site where this sewage sludge was land applied is now a cumulative pollutant loading rate site (CPLR). Recordkeeping must be maintained for this site in accordance with Chapter 3745-40 of the OAC. Also, the treatment plant shall document how this type of violation will be avoided in the future.

- OAC 3745-40-06(E) states that "For authorized sites, the frequency of monitoring for soil pH and soil phosphorous level (Bray-Kurtz P1 extraction or Mehlich 3 extraction) shall be such that the most recent results are not more than two years old at the time of bulk sewage sludge land application."

Records were not available at the time of my inspection to show that land application sites had been tested for pH and soil phosphorous. The sites utilized for land application must be tested for pH and soil phosphorous levels, or records documenting that these tests have been performed must be provided before land application resumes,.

- OAC 3745-40-06(I) requires that the permittee who provides treatment to bulk sewage sludge develop and sign the following certification statements:

"I certify, under penalty of law, that the information that will be used to determine compliance with class (insert A or B) pathogen reduction alternative (insert one of the class A alternatives in paragraphs (N)(1) to (N)(6) of rule 3745-40-05 of the Administrative Code or one of the class B alternatives in paragraphs (O)(1) to (O)(3) of rule 3745-40-05 of the Administrative Code) 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."

and

"I certify, under penalty of law, that the information that will be used to determine compliance with vector attraction reduction requirement (insert one of the vector attraction reduction requirements in paragraphs (Q)(1) to (Q)(8) of rule 3745-40-05 of the Administrative Code) 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."

At the time of my inspection, the WWTP was not developing and signing these certification statements. These certification statements need to be developed, and then a copy of them must be signed and dated by the superintendent every time that tests are conducted (or samples taken) to determine pathogen and vector attraction reduction .

- OAC 3745-40-06(I) requires that the permittee who provides treatment to bulk sewage sludge develop and retain a description of how the pathogen reduction requirements of rule 3745-40-05 of the Administrative Code are met and a description of how the vector attraction reduction requirements of rule 3745-40-05 of the Administrative Code are met.

These descriptions need to detail which options you are planning to meet, how you are going to meet them (i.e. what kind of tests need to be run, where to get samples from, how many samples to take, etc.), and need to be kept on site so staff at the treatment plant understand them.

There were two other issues of concern that arose during the inspection. The first is in regards to screening at the headworks of the plant. Screening at the head of the plant should be able to remove most manufactured inerts/trash from the wastewater influent so as trash does not end up in the sewage sludge. It is recommended that the wastewater treatment plant upgrade its headworks to include screening with a minimum opening of 3/8" for all wastewater flows. The second issue concerns the storage pad where sewage sludge is kept before land application. The bottom of this pad is currently sand with a drain that discharges any liquid coming from the sewage sludge stockpile straight onto the ground behind the pad. Although the sewage sludge on the pad is mostly solid when placed there, rainwater that falls in the vicinity of the pad is able to enter the storage pad area and percolate through the sewage sludge before being discharged onto the ground. This is a direct discharge of nutrient laden water which may be leading to pollution of waters of the state. This drain should be plugged off or diverted back to the head of the plant and all rainwater should be diverted away from the storage area. Also, because there are no storm drains that drain back to the head of the plant for the asphalt area around the storage pad, a concerted effort should be made to keep all sewage sludge off of the asphalt area and under roof.

At this time, the Gallipolis WWTP is in violation of Chapter 3745-40 of the Ohio Administrative Code. Within thirty days of receiving this inspection letter, information must be submitted to Ohio EPA that details how the above violations and deficiencies will be addressed.

If you have any immediate questions concerning this letter, you may contact me (614) 644-2018 or by email at jacob.howdysshell@epa.state.oh.us.

Gallipolis WWTP Sewage Sludge Inspection
June 2, 2009
Page 5 of 5

Sincerely,



Jacob Howdyshell
Biosolids Coordinator
Ohio EPA Division of Surface Water, Central Office

Cc: John Westfall, Superintendent
Dan Messerly, Ohio EPA SEDO
file



**SEWAGE SLUDGE LAND APPLICATION
INSPECTION**

Date of Inspection: 4/28/09

Inspector Name: JACOB HOWDYSHEN, DAN MESSERLY

Facility Name GALLIAPOLIS WWTP

Facility Address: <u>1547 CHATHAM AVE</u>
City:
Zip:

Mailing Address: <u>518 SECOND AVE.</u>
City: <u>GALLIAPOLIS</u>
Zip: <u>45631</u>

Contacts Present

Name: <u>JOHN WESTFALL</u>
Title: <u>SUPERVISOR</u>
Phone: <u>(740) 446-1690</u>
Fax:

Name:
Title:
Phone:
Fax:

I. Facility Information

Facility Background

Average Daily Flow (MGD)	<u>0.8 - 1.0</u>
Sewage Sludge Class	<u>EQ (B) Unknown</u>
Sewage Sludge Storage Capacity (Days)	<u>AT LEAST 180</u>
Contracted Alternative (if applicable)	

Facility Sewage Sludge Treatment Process(es)

Treatment Process	# Units	Notes
<u>ANAEROBIC DIGESTERS</u>	<u>2</u>	<u>1 PRIMARY - 250,000 GAL, 1 SECONDARY - 275,000 GAL</u>
<u>DRYING BEDS</u>	<u>9</u>	<u>82' x 19' - SAND</u>
<u>STORAGE PAD</u>	<u>1</u>	<u>26' x 40' - SAND</u>

II. Management Practices

General Facility Sewage Sludge Treatment

<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	1. Are the sewage sludge treatment units being operated/maintained in accordance with the manufacturer's specifications?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	2. Does the facility have adequate equipment redundancy (ie. back-up sewage sludge treatment units)?
Yes <input checked="" type="radio"/> No <input type="radio"/> N/A	3. Does the facility have any plans for upgrades to any of the sewage sludge treatment units? If so, explain:
Yes <input checked="" type="radio"/> No <input type="radio"/> N/A	4. Does the facility have a contingency plan for sewage sludge disposal?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	5. Is the sewage sludge handling operation adequate to manage the volume of sewage sludge generated?
Comments:	WILL BE WORKING ON LANDFILL CONTRACT.

Drying Beds, Gravity Thickener, Centrifuge, and Dissolved Air Floatation N/A

Average percent (%) solids before thickening:	5	Average percent (%) solids ^{AFTER} before thickening:	80-90
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Yes <input checked="" type="radio"/> No <input type="radio"/> N/A	1. Is primary unstabilized sewage sludge fed to the drying beds, gravity thickener, or centrifuge?
Yes <input checked="" type="radio"/> No <input type="radio"/> N/A	2. Is the sewage sludge mixed with other materials, including coagulants, before or after thickening?

Average percent (%) solids before mixing sewage sludge with other materials:	
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Comments:	
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Aerobic Digestion

N/A

	1. Sewage sludge fed to the aerobic digester includes: <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Combined
Yes No N/A	2. Aerobic digester is operated at proper temperature? <input type="checkbox"/> Cryophilic (<10° C = <50° F) <input type="checkbox"/> Mesophilic (10° to 42° C = 50° to 108° F) <input type="checkbox"/> Thermophilic (>42° C =>108° F)
Comments:	

Anaerobic Digestion

N/A

	1. Sewage sludge fed to the aerobic digester includes: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Combined
	2. Anaerobic digester operating mode: <input checked="" type="checkbox"/> High Rate* <input type="checkbox"/> Low Rate <small>*Utilize a combination of active mixing and elevated temperatures.</small>
<input checked="" type="radio"/> Yes No N/A	3. Aerobic digester is operated at proper temperature? <input checked="" type="checkbox"/> Cryophilic (35° C = 95° F) <input type="checkbox"/> Thermophilic (55° C = 131° F)
Comments:	TEMP. AND VOLUME PUMPED MEASURED TWICE A DAY.

Composting

N/A

	1. Type of sewage sludge composting performed: <input type="checkbox"/> In Vessel <input type="checkbox"/> Static Piles <input type="checkbox"/> Windrows
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	2. Type of sewage sludge composted includes: <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Combined
Yes No N/A	3. Is the moisture content of the composting operation monitored?
Yes No N/A	4. Is the compost mixed? If so, number of turnings: <input type="text"/>
Yes No N/A	5. Is the oxygen content of the compost monitored?
Yes No N/A	6. Is the temperature of the compost monitored?
Yes No N/A	7. Are total and total volatile solids of the compost monitored?
Yes No N/A	8. Active Phase (days): <input type="text"/> Curing Phase (days): <input type="text"/>
Comments:	

Land Application

N/A

	1. Sewage sludge is applied to: <input checked="" type="checkbox"/> Authorized Sewage Sludge Site <input type="checkbox"/> Unauthorized Sewage Sludge Site <input type="checkbox"/> Forest <input type="checkbox"/> Reclamation Site <input type="checkbox"/> Lawn or Garden <input type="checkbox"/> Public Contact Site (ie. park, etc.)
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Yes No N/A

2. Are Class A pathogen reduction requirements met (indicate method being performed)?

- Alt. 1 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and time/temperature:
 - >7% solids at >50° C (>122°F) for >20 minutes (no warmed gases or immiscible liquid).
 - >7% solids at >50° C (>122°F) for >15 seconds (warmed gases or immiscible liquid).
 - <7% solids at X° C for >15 seconds to <30 minutes.
 - <7% solids at >50° C (>122°F) for >30 minutes.

- Alt. 2 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and pH > 12 for 72 hours.

- Alt. 3 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and other processes:
 - Enteric virus is <1 plaque forming unit (PFU) per 4 grams of total solids (TS) **PRIOR** to pathogen treatment (PT).
 - Enteric virus is >1 PFU per 4 grams of TS prior to PT but is <1 per 4 grams of TS **AFTER** PT.
 - Helminth ova is <1 per 4 grams of TS **PRIOR** to PT.
 - Enteric virus >1 PFU per 4 grams of TS prior to PT, but is <1 per 4 grams of TS **AFTER** PT.

- Alt. 4 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and unknown processes:
 - Enteric virus is <1 PFU per 4 grams of TS at disposal.
 - Helminth ova is <1 per 4 grams of TS at disposal.

- Alt. 5 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and PFRP:
 - 1. Composting.
 - 2. Heat drying.
 - 3. Heat treatment.
 - 4. Thermophilic aerobic digestion.
 - 5. Beta ray irradiation.
 - 6. Gamma ray irradiation.
 - 7. Pasteurization.

- Alt. 6 - Equivalent process.

<p>Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/></p>	<p>3. Are Class B pathogen reduction requirements met (indicate method being performed)?</p> <p><input checked="" type="checkbox"/> Alt. 1 -Geometric mean of seven Fecal Coliform samples with <2,000,000 MPN/g total dry solids or <2,000,000 Colony Forming Units/g total dry solids.</p> <p><input type="checkbox"/> Alt. 2 - PSRP 1 aerobic digestion. Mean cell residence time and temperature shall be between 40 days at 20°C (68°F) and 60 days at 15°C (59°F).</p> <p>Average mean cell residence time (days): <input type="text"/></p> <p>Average temperature (°C) : <input type="text"/></p> <p><input type="checkbox"/> PSRP 2 air drying. Sewage sludge dried on sand beds or basins for 3 months at an ambient average daily temperature >0°C (>32°F)</p> <p><input type="checkbox"/> PSRP 3 anaerobic digestion. Mean cell residence time and temperature shall be between 15 days at 35°-55°C (95°-131°F) and 60 days at 20°C (68°F).</p> <p>Average mean cell residence time (days): <input type="text"/></p> <p>Average temperature (°C) : <input type="text"/></p> <p><input type="checkbox"/> PSRP 4 composting. Sewage sludge temperature is raised to >40°C (>104°F) for 5 days. Temperature must exceed 55°C (>131°F) for 4 hours during the 5 day period.</p> <p><input type="checkbox"/> PSRP 5 lime treatment. Lime is added to sewage sludge to raise the pH to 12 after 2 hours of contact.</p>
<p>Yes <input type="radio"/> No <input checked="" type="radio"/> N/A <input type="radio"/></p>	<p>4. Are the Class B signage requirements being satisfied?</p>

<p>Yes No N/A</p>	<p>5. Are Class B site restrictions being practiced (indicate restrictions being performed)?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Food crops (above ground) are harvested >14 months after sewage sludge application. <input type="checkbox"/> Food crops (below ground) are harvested >20 months after sewage sludge application when sewage sludge remains on ground >4 months before soil incorporation. <input type="checkbox"/> Food crops (below ground) are harvested >38 months after sewage sludge application when sewage sludge remains on ground <4 months before soil incorporation. <input checked="" type="checkbox"/> Food crops, feed crops, and fiber crops are harvested >30 days after sewage sludge application. <input checked="" type="checkbox"/> Animal grazing allowed on land only >30 days after sewage sludge application. <input type="checkbox"/> Turf grown on land where sewage sludge was applied not harvested for >1 year if placed on land with high potential for public exposure or lawn. <input type="checkbox"/> Public access restricted to land with a high potential for public exposure for 1 year. <input checked="" type="checkbox"/> Public access restricted to land with a low potential for public exposure for 30 days.
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Yes <input type="radio"/> No <input checked="" type="radio"/> N/A	<p>6. Are bulk sewage sludge site restrictions being practiced (indicate restrictions being performed)?</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> No threatened or endangered species present or critical habitat affected at the site where sewage sludge is applied. <input checked="" type="checkbox"/> Bulk sewage sludge is not applied to frozen or snow covered ground unless applied >100 feet from waters of the state and appropriate ground cover maintained. <input checked="" type="checkbox"/> Bulk sewage sludge is not applied <33 feet from waters of the state. <input type="checkbox"/> Bulk sewage sludge is applied at a rate equal or less than the agronomic rate. <input type="checkbox"/> Label affixed no bag or information sheet provided to user of sold and given away sludge indicating name of sludge preparer, application instruction, and maximum annual whole sludge application rate.
Yes <input type="radio"/> No <input checked="" type="radio"/> N/A	<p>7. Are bulk sewage sludge general requirements being practiced (indicate restrictions being performed)?</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Sewage sludge is not applied to a site where the cumulative pollutant loading or annual application rate has been reached.. <input type="checkbox"/> Notification given to the sludge applier regarding total nitrogen content of the sludge. <input checked="" type="checkbox"/> Sufficient information required to comply with OAC 3745-40. <input checked="" type="checkbox"/> Sewage sludge site authorization packet submitted to Ohio EPA regarding the location of land application sites, appropriate NPDES permit numbers.

AGRONOMIC RATES NOT CALCULATED
 NO INFO SHEET

<p>Yes No N/A</p>	<p>7. Is a vector attraction reduction method being met (indicate method being performed)?</p> <p><input type="checkbox"/> 38% Volatile Solids Reduction.</p> <p>VS Red. = (VS In - VS Out) / ((VS In) - (VS, In x VS, Out)) x 100%</p> <p><input type="checkbox"/> 40-day bench scale test. Volatile Solids reduced <17% (anaerobic digestion only)</p> <p><input type="checkbox"/> 30-day test bench scale . Volatile Solids reduced <15% (aerobic digestion only)</p> <p><input type="checkbox"/> Specific Oxygen Uptake Rate <1.5 mg/hr/gm Total Solids at 20°C (68°F).</p> <p><input type="checkbox"/> Aerobic process for >14 days at >40°C (104°F) with average sewage sludge temperatures at 45°C (113°F).</p> <p><input type="checkbox"/> pH >12 for 2 hours and pH >11.5 for 22 hours.</p> <p><input checked="" type="checkbox"/> Sewage sludge with no unstabilized solids contains >75% Total Solids prior to mixing with other materials.</p> <p><input type="checkbox"/> Sewage sludge with unstabilized solids contains >90% Total Solids prior to mixing with other materials.</p> <p><input type="checkbox"/> Subsurface injection.</p> <p><input type="checkbox"/> Soil incorporation within 6 hours for Class B or within 8 hours for EQ.</p>
<p>Comments:</p>	

Other Management Practices

N/A

	<p>1. The facility performs another sewage sludge treatment process (indicate which other management practice is being performed)</p> <p><input type="checkbox"/> Surface Disposal.</p> <p><input type="checkbox"/> Landfilling.</p> <p><input type="checkbox"/> PPG Lime Lakes.</p>
Comments:	

III. NPDES Permit Verification

<p><input checked="" type="radio"/> Yes No N/A</p>	<p>1. Are OAC 3745-40 sewage sludge frequency and monitoring parameters contained in the facility's current NPDES permit?</p>
	<p>2. Sewage sludge disposal practice(s):</p> <p>A. Land Application <input checked="" type="checkbox"/></p> <p> Bulk Sewage Sludge <input type="checkbox"/></p> <p> Bulk Material Derived from <input type="checkbox"/></p> <p> Sewage Sludge Sold or Given <input type="checkbox"/></p> <p> Away in Bag or Other Container <input type="checkbox"/></p> <p>B. Surface Disposal <input type="checkbox"/></p> <p>C. Sewage Sludge Incineration <input type="checkbox"/></p> <p>D. Onsite or Offsite Disposal <input type="checkbox"/></p> <p>E. Other: <input type="checkbox"/></p>
<p><input checked="" type="radio"/> Yes No N/A</p>	<p>3. Is the sewage sludge disposal practice authorized by current NPDES permit?</p>
<p><input checked="" type="radio"/> Yes No N/A</p>	<p>4. If the authorized sewage sludge disposal practice changes, will notification be given to Ohio EPA prior to the change?</p>
<p><input checked="" type="radio"/> Yes No N/A</p>	<p>5. The facility is utilizing sewage sludge land application sites that have been previously authorized by Ohio EPA.</p>
Comments:	

Monitoring and Reporting

<input checked="" type="radio"/> Yes	No	N/A	1. Is facility self-monitoring occurring at the frequencies specified for the parameters located in the facility's NPDES permit or OAC 3745-40?
<input checked="" type="radio"/> Yes	No	N/A	2. Is the facility reporting parameters using Ohio EPA form 4500?
<input checked="" type="radio"/> Yes	No	N/A	3. Is facility self-monitoring data available for all regulated pollutants for the previous five years?
Yes	<input checked="" type="radio"/> No	N/A	4. Do monthly operating reports show pollutant concentrations below ceiling concentrations shown in OAC 3745-40-05(F)(1)?
Yes	<input checked="" type="radio"/> No	N/A	5. Do monthly operating reports show pollutant concentrations below monthly average concentrations shown in OAC 3745-40-05(F)(3)?
Yes	<input checked="" type="radio"/> No	N/A	6. Are general requirements and management practices applied for sewage sludge not meeting monthly average concentrations shown in OAC 3745-40-05(F)(3)?
<input checked="" type="radio"/> Yes	No	N/A	7. Are sewage sludge records adequate to assess compliance with annual and/or cumulative pollutant loading rates?
Yes	<input checked="" type="radio"/> No	N/A	8. Are pathogen and vector attraction reduction method descriptions and certification statements available for the previous five years?
<input checked="" type="radio"/> Yes	No	N/A	9. Are records available for all sewage sludge use or disposal practices available for the previous five years?
Yes	<input checked="" type="radio"/> No	N/A	10. Have the facility's sewage sludge sites been tested for pH and Phosphorus within two years of land application?
<input checked="" type="radio"/> Yes	No	N/A	11. Are accurate records of sewage sludge volume or mass maintained for the previous five years?
Yes	<input checked="" type="radio"/> No	N/A	12. Are monitoring and analysis being performed more frequently than required by the facility's NPDES permit?
Yes	No	<input checked="" type="radio"/> N/A	If so, are the results being reported to Ohio EPA?
<input checked="" type="radio"/> Yes	No	N/A	13. Do sewage sludge treatment unit operation records verify compliance with pathogen reduction and vector attraction reduction requirements, when appropriate?
<input checked="" type="radio"/> Yes	No	N/A	14. Are sewage sludge samples taken at the locations specified in the facility's NPDES permit?

MOLYBDENUM

- HIGH MB LAND APPLIED LAST YEAR

- NO SOIL TEST RESULTS IMMEDIATELY AVAILABLE

<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	15. Are sewage sludge sample locations and methods appropriate for obtaining representative samples?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	16. Sample collection procedures:
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	A. Adequate sample volumes obtained?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	B. Proper preservation techniques utilized?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	C. Containers conform to appropriate analytical methods specified in OAC 3745-40?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	D. Samples analyzed within the appropriate time frames specified in OAC 3745-40?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	17. Are analytic results reported on a dry weight basis (mg/kg)?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	18. Are samples refrigerated subsequent to compositing?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	19. Are chain-of-custody procedures employed?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	20. Are the analytic methods used approved in OAC 3745-40?
Comments:			

- SCREENING

- DRAINAGE AROUND AND IN STORAGE AREA