Environmental
Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: **Notice of Violation (NOV)**
Ottawa County
Elmore WWTP
Biosolids Inspection

July 10, 2012

Mr. Buck Stoiber
Superintendent
Village of Elmore
344 Rice Street
P.O. Box 1
Elmore, Ohio 43416

Dear Mr. Stoiber:

On June 27, 2012, Mr. Andrew Gall conducted an inspection at the Village of Elmore Wastewater Treatment Plant (WWTP). As part of the inspection, he evaluated compliance with the Ohio Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. Bill Treat was present and provided information on sludge treatment operations and record keeping. The inspection included a walk through the plant, a review of the sewage sludge records and completion of the enclosed checklist.

Sewage sludge is currently treated in the Imhoff tank. The Village currently contracts with Midwest Compost, Inc., to land apply the sludge several times per year. Mr. Treat indicated that the last hauling event was January 11, 2012, when approximately 40,000 gallons was land applied. At the time of the inspection, no field records available in order to verify compliance with record keeping requirements of OAC 3745-40-09(C)(4).

A review of the Discharge Monitoring Reports (DMR's) and Annual Sewage Sludge Reports shows that the Village of Elmore failed to monitor the sewage sludge in accordance with monitoring requirements contained in Part I, B Table 581 of its National Pollutant Discharge Elimination System (NPDES) permit in 2011, 2009, 2008 and 2007. This is a violation of the NPDES permit and the metals monitoring requirements of OAC 3745-40-04(D) and OAC 3745-40-09(B).

Facilities who prepare Class B biosolids for beneficial use are required to meet one of the pathogen reduction alternatives contained in OAC 3745-40-04(B)(1) to (B)(16) and one of the vector attraction reduction alternatives contained in OAC 3745-40-04(C)(1) to (C)(10). At the time of the inspection, there was no records available indicating that the Village of Elmore has been meeting a pathogen reduction alternative and a vector attraction reduction alternative.

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

Ohio EPA informed the Village of these requirements in our letter dated July 11, 2008. In your letter dated August 7, 2008, you indicated that the Village would take steps to come into compliance with Ohio's Sewage Sludge rules. However, based on our most recent inspection, the Village has not complied with Ohio's Sewage sludge rules. **Therefore, land application of Elmore sludge shall cease immediately. Elmore sludge should be hauled to another NPDES permitted facility for treatment or dewatered and hauled to a landfill for disposal.**

The Village of Elmore must develop and implement a Standard Operating Procedure (SOP) that contains specific details on how the sludge treatment and land application requirements will be met, before Ohio EPA will consider permitting the Village of Elmore to land apply sludge in the future. A copy of the SOP should be submitted to Ohio EPA NWDO for our review and written approval.

We request that you submit a written response addressing the above mentioned issues within 30 days of receiving this letter. Please submit your response to Mr. Andrew Gall's attention at: Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402. Ohio's Sewage Sludge Rules can be found on the following Ohio EPA website:

http://www.epa.ohio.gov/dsw/rules/3745_40.aspx

If there are any questions regarding the inspection or this letter, please contact Mr. Gall at (419) 373-3003 or via email at andrew.gall@epa.state.oh.us.

Sincerely,

Alex A. Smaili

Alex A. Smaili, P.E.
Water Quality Engineer II/Unit Supervisor
Division of Surface Water

AG/jlm
Enclosure
pc: Mayor and Council, Village of Elmore
Midwest Compost Inc.
ec: Rick Zuzik, NWDO-DSW
Chris Moody, NEDO-DSW
Jacob Howdyshell, CO-DSW
Tracking

Ohio Environmental Protection Agency

Inspector: A. Ball
Date of Inspection: 6/27/2012

BIOSOLIDS GENERATOR INSPECTION

1. Contact Information

Treatment Works		Contractor
Generator: Elmore WWTP		Name: Midwest Compost
Name: Bill Treat		Contact: John Staeger
Title: Operator		Title:
Phone: 419-862-3454		Phone: 419-547-7979
Email:		Email:
		Mailing Address: 6090 St. Rt. 101 Clyde, OH 43410

List Additional Persons Present:

2. Inspection Letter Notification

Mailing Address (1)	Mailing Address (2)
Name: Buck Stoiber	Name:
Title: Superintendent	Title:
Mailing Address: 344 Rice St. P.O. Box 1 Elmore, OH 43416	Mailing Address:

3. Facility Information

Average Daily Flow (MGD)		
Design Treatment Capacity (MGD)		
Biosolids Storage Capacity (Days)		
Contracted Alternative / Contingency Disposal		
Headworks Screening	Screen Size:	
	Alternative:	

Plans for Upgrades:
Upgrading to oxidation ditch and aerated sludge holding

Recent Maintenance Issues/Equipment Failures:		
NPDES Permit Verification	Station 581: Class B Biosolids	☒
	Station 584: Exceptional Quality Biosolids	☐
	Station 586: Landfill	☐
	Station 588: Transfer to NPDES Permittee	☐
	Station 589: PPG Lime Lakes	☐
	SMP less than 5 years old	☐

4. Sewage Sludge Treatment

Treatment Units	Quantity	Comments (Online/Offline and Capacity/Dimensions)
Aerobic Digesters		
Anaerobic Digesters		
Belt Filter Press		
Holding Tanks		
Gravity Thickener		
Drying Beds		
Storage Pad		
Lagoon		
Centrifuge		
Dryer		
Other	1	Imhoff Tank – Spiragester
Comments: Upgrades – Oxidation ditch with 2 Aerated Sludge Tank		

5. Biosolids Treatment Train Flow Chart (Primary and Secondary)

Spiragester	→	Land App			

6. Operational Questions

Digester Operational Temperature	Digester Environment:	Temperature:
	Aerobic	
	Anaerobic	
Dewatering Efficiency	Sample Location:	Average % Solids:
	Prior to Dewatering	
	After Dewatering	

7. Beneficial Use or Disposal

☒	Beneficial Use	☒ Class B ☐ Exceptional Quality
☐	Transfer to Another NPDES Permittee	Name of Permittee:
☐	Landfill	Name of Landfill:
☐	Incineration	
Comments:		

8. Pathogen Reduction Alternative

☐	P-1	Geometric Mean of Seven Fecal Coliform Samples	Less than two million most probable number or colony forming units per gram of total solids (dry weight basis).	
			☐	Documentation of stabilization via an actively mixed aerobic or anaerobic process or through lime stabilization.
			☐	Fecal coliform analytical results.
			☐	The geometric mean calculations.
☐	P-2	Aerobic Digestion	The mean cell residence time and temperature shall be between 40 days at 20°C (68°F) and 60 days at 15 °C (59°F).	
			☐	Mean cell residence time Minimum residence time: Average residence time:
			☐	Temperature records maintained during the mean cell residence time. Minimum temperature: Average temperature:

☐	P-3	Air Drying	Sewage sludge is dried for a minimum of 90 days. The average ambient air temperature is greater than 0°C (32 °F) for at least 60 days within the 90 day period.	
			☐	The type of drying bed media being used:
			☐	90 days of drying met for all poured beds.
			☐	Daily temperature records maintained.
☐	P-4	Anaerobic Digestion	Mean cell residence time and temperature shall be between 15 days at 35 to 55°C (95 to 131°F) and 60 days at 20°C (68°F).	
			☐	The mean cell residence time Minimum residence time: Average residence time:
			☐	Temperature records maintained during the mean cell residence time.
			☐	The weight/volume and county of origin of all feedstocks, bulking agents and additives.
			☐	List feedstocks:
☐	P-5	Composting		
		☐ i. In vessel	The compost temperature is ≥40°C (104°F) for 5 consecutive days. For four consecutive hours during the 5 day period, the compost temperature must ≥55 °C (131°F).	
		☐ ii. Aerated static pile	The compost temperature is ≥40°C (104°F) for 5 consecutive days. For 4 consecutive hours during the 5 day period, the compost temperature must ≥55 °C (131°F). One foot or greater of insulation material.	

		☐ iii. Windrow	The compost temperature is ≥40°C (104°F) for a minimum of 5 consecutive days, except during active turning or mixing. For 4 consecutive hours during the 5 day period, the compost temperature must ≥55 °C (131°F). The compost is turned or mixed (via machine) during the 5 day period. The compost temperature shall be ≥40°C (104°F) within 24 hours after turning or mixing.	
			☐	A description of the composting method.
			☐	Daily temperature records for each vessel/aerated static pile/windrow showing the compost temperature is ≥40°C (104°F) for 5 consecutive days.
			☐	The hourly readings for each vessel/aerated static pile/windrow showing the compost temperature is ≥55 °C (131°F) for 4 consecutive hours during the 5 day period.
			☐	**Windrow Only** - Records of the day and the time each windrow was turned or mixed. Average number of turnings:
			☐	The weight/volume and county of origin of all feedstocks, bulking agents and additives.
			☐	List feedstocks:
☐	P-6	Lime Treatment	The sewage sludge pH shall rise to twelve after two hours of contact.	
			☐	A description of how the pH is monitored throughout the sludge and how the lime is mixed into the sludge.
			☐	Records for pH after initial addition of lime.
			☐	Records for pH two hours after lime addition.
			☐	Records of the amount (dry tons) of lime added.
☐	P-7	Equivalent Process	Obtained an equivalency recommendation from USEPA's pathogen equivalency committee.	
			☐	Records as necessary to demonstrate the process equivalent to a process to significantly reduce pathogens.
☐	P-8	Time and Temperature		
		☐ i. > 7% solids	The sewage sludge temperature shall be ≥55 °C (131°F)	

			for ≥20 minutes.
		☐ ii. > 7% and heated by warmed gases or an immiscible liquid	The sewage sludge temperature shall be ≥50 °C (122°F) for ≥15 seconds.
		☐ iii. < 7% solids	The sewage sludge temperature shall be X°C for ≥ 15 seconds, but ≤ 30 minutes.
		☐ iv. < 7% solids	The sewage sludge temperature is ≥50°C (122°F) for ≥30 minutes.
			☐ Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐ Temperature records Minimum temperature: Average temperature:
			☐ Treatment Time Records Minimum treatment time: Days / Hours / Minutes / Seconds Average treatment time: Days / Hours / Minutes / Seconds
			☐ Average % solids:
☐	P-9	High pH and High Temperature	The pH of the sewage sludge is ≥12 for at least 72 hours. The sewage sludge temperature is ≥52°C (125.6°F) for ≥12 hours during the period that the pH is ≥12. At the end of the 72 hours period the sewage sludge is ≥ 50% solids.
			☐ Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			Records of pH at: ☐ i. Start up; ☐ ii. 24 hours; ☐ iii. 48 hours; and

		☐	iv. 72 hours
		☐	The hourly biosolids temperature for the required 12 hours. Minimum temperature: Average temperature:
		☐	The % solids after air drying. Minimum % solids: Average % solids:
		☐	Records of the amount (dry tons) of alkaline material added.
		☐	A narrative description of how pH and temperature are maintained throughout all of the biosolids.
☐	P-10	EQ Composting	
		☐ i. In-vessel	The compost temperature is ≥55°C (131°F) for 72 hours.
		☐ ii. Aerated static pile	The compost temperature is ≥55°C (131°F) for 72 hours. One foot or greater of insulation material.
		☐ iii. Windrow	The compost temperature is ≥55°C (131°F) for ≥15 consecutive days. The compost is turned or mixed (via machine) 5 times at 72 hour intervals during the 15 day period. The core temperature is ≥55°C (131°F) within 24 hours after each turning or mixing.
		☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
		☐	A description of the composting method.
		☐	The weight or volume and county of origin of all feedstocks, bulking agents and additives utilized in the composting process.
			Records the temperature was maintained ≥55 °C (131°F) for:

			☐ ☐	i. 3 days for in-vessel/aerated static pile; or ii. 15 days for windrow.
			☐	Windrow Only - Records of the day and the time each windrow was turned or mixed. Average number of turnings:
			☐	List feedstocks:
☐	P-11	Heat Drying	Drying the sewage sludge to ≥90% solids, where either the sewage sludge temperature ≥80°C (176°F) or the wet bulb temperature of the gas leaving the dryer ≥80°C (176°F).	
			☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐	The % solids of the dried sewage sludge. Minimum % solids: Average % solids:
			☐	Records that the sewage sludge temperature / wet bulb temperature of exit gas is ≥80°C (176°F). Minimum temperature: Average temperature:
☐	P-12	Thermophilic Aerobic Digestion	Mean cell residence time is 10 days and the temperature is between 55°C to 60°C (131°F to 140°F).	
			☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐	Records that the temperature was maintained at 55°C to 60°C (131°F to 140°F) in each digester. Minimum temperature:

				Average temperature:
			☐	Records documenting the mean cell residence time was met in each digester. Minimum residence time: Days | Hours | Minutes | Seconds Average residence time: Days | Hours | Minutes | Seconds
☐	P-13	Beta Ray Irradiation	Irradiated with beta rays from an accelerator at dosages of at least one megarad at room temperature.	
			☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐	The beta ray dosage.
			☐	Records of the ambient room temperature.
☐	P-14	Gamma Ray Irradiation	Irradiated with gamma rays from certain isotopes, such as \60\cobalt and \137\cesium, at dosages of at least one megarad at room temperature.	
			☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐	Documentation of the gamma ray isotope uses.
			☐	The gamma ray dosage.
			☐	Records of the ambient room temperature.
☐	P-15	Pasteurization	The sewage sludge temperature will be ≥70°C (158°F) for ≥30 minutes and tracked constantly.	
			☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐	Records documenting that the sewage sludge temperature was ≥70°C (158°F) for ≥30 minutes. Temperature Records Minimum temperature: Average temperature:

				Treatment Time Records Minimum treatment time: Days / Hours / Minutes / Seconds Average treatment time: Days / Hours / Minutes / Seconds
☐	P-16	Equivalent Process		Obtained an equivalency recommendation from USEPA's pathogen equivalency committee.
			☐	Analytical results for density of fecal coliform (mpn/g) or the density of Salmonella sp. bacteria expressed as mpn/4g.
			☐	Records as necessary to demonstrate the process equivalent to a process to significantly reduce pathogens.

Comments:
No documentation to comply with Pathogen Reduction Requirements

9. Vector Attraction Reduction Option

	Vector Attraction Reduction Option			Requirements
☐	VAR-1	38% Volatile Solids Reduction	☐ ☐	Average volatile solids concentration of: i. The raw sewage sludge: ii. The final sewage sludge:
			☐	The average volatile solids reduction: $\%VSR = \frac{VSin - VSout}{VSin - (VSin \times VSout)} \times 100$
☐	VAR-2	Bench Scale Anaerobic Digestion		Digesting anaerobic sewage sludge in a bench scale unit for 40 days between 30°C and 37°C (86°F and 98.6°F). At the end of 40 days the volatile solids reduction is ≤17%.
			☐	A description of the bench scale digester.
			☐	The time (days) that the sample was further digested in the bench scale digester.
			☐	Daily temperature records.
			☐ ☐	The volatile solids concentration of the sewage sludge: i. Before bench scale digestion; and ii. After the bench scale digestion.
☐	VAR-3	Bench Scale Aerobic Digestion		Digesting ≤2% solids aerobic sewage sludge aerobically in a bench-scale unit for 30 days at 20°C (68°F). At the end

				of 30 days the volatile solids reduction is ≤15%.
			☐	A description of the bench scale digester.
			☐	The time (days) that the sample was further digested in the bench scale digester.
			☐	Daily temperature records.
			☐ ☐	The volatile solids concentration of the sewage sludge: iii. Before bench scale digestion; and iv. After the bench scale digestion.
☐	VAR-4	Specific Oxygen Uptake Rate		For aerobic sewage sludge that is treated between 10°C and 30°C (50°F and 86°F), the specific oxygen uptake rate shall be ≤1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at 20°C (68°F).
			☐	Dissolved oxygen readings for sewage sludge sample over fifteen minute intervals.
			☐	Temperature records showing that the test was corrected to 20°C (68°F): $Sour_{20\text{-degrees Celsius}} = Sour_{T\text{-degrees Celsius}} \times \Theta^{(20-T)}$ (Where T is the temperature of the sewage sludge when the SOUR test was started; and Where $\Theta = 1.05$ if $T > 20$ degrees Celsius; or Where $\Theta = 1.07$ if $T < 20$ degrees Celsius)
			☐	Total solids for the sewage sludge sample.
			☐	The SOUR calculations. Maximum SOUR: Minimum SOUR:
☐	VAR-5	Aerobic Process Time and Temperature Treatment		Sewage sludge shall be aerobically treated for ≥14 days. During that time, the sewage sludge temperature shall be ≥40°C (104°F) and the average sewage sludge temperature shall be ≥45°C (113°F).
			☐	Records of the detention time in the aerobic digester/ composting process. Minimum detention time: Days / Hours / Minutes / Seconds Average detention time: Days / Hours / Minutes / Seconds

			☐	Temperature records. Minimum temperature: Average temperature:
☐	VAR-6	Alkaline Treatment	The pH shall be ≥12 by alkaline addition and, without the addition of more alkali, shall remain ≥12 for 2 hours and then remain ≥11.5 for an additional 22 hours.	
			☐	A narrative description of how the pH was monitored throughout the material for the applicable time period.
			☐ ☐	Records indicating the pH was maintained: i. ≥12 for 2 hours; and ii. ≥11.5 for 24 hours.
			☐	Records of the amount (dry tons) of alkaline material added.
☐	VAR-7	≥75% solids	The % solids that do not contain primary unstabilized solids shall be ≥75% prior to mixing with other materials.	
			☐	Results of % solids tests. Minimum % solids: Average % solids:
			☐	Has the sewage sludge been stabilized?
☐	VAR-8	≥90% solids	The % solids that contain primary unstabilized solids shall be ≥90% prior to mixing with other materials.	
			☐	Results of % solids tests. Minimum % solids: Average % solids:
☐	VAR-9	Injection	Injected below the surface of the beneficial use site.	
			☐	Applier certification statement.
☐	VAR-10	Immediate Incorporation	Incorporation into the soil within 6 hours.	
			☐	Applier certification statement.

Comments:
No Records to verify Vector Attraction Reduction options are being met.

10. Records Retention

Biosolids Classification		Record Requirements
N/A Exceptional Quality	☐	The following analytical results: ☐ Arsenic ☐ Cadmium ☐ Copper ☐ Lead ☐ Mercury ☐ Molybdenum ☐ Nickel ☐ Selenium ☐ Zinc ☐ Total Kjeldahl Nitrogen ☐ Ammonia Nitrogen ☐ Total Phosphorus ☐ Total Potassium
	☐ ☐ ☐ ☐ ☐ ☐ ☐	Standard Operating Procedure, including: i. Sample collection or monitoring locations; ii. The frequency at which sample collection or monitoring is to occur; iii. Sample collection or monitoring procedures; iv. Sample storage and preservation procedures; v. Sample or monitoring analysis procedures; and vi. Any calculations required for sample or monitoring analysis.
	☐	An example of the notice and necessary information.
	☐	Contact information for each person who receives the EQ biosolids.
	☐	**Bulk EQ Only** - Records showing that bulk EQ biosolids were not stored ≥90 days at the beneficial use site.
	☐ ☐ ☐ ☐	**Bulk EQ Only** - The following beneficial use site records: i. The soil phosphorous levels; ii. The agronomic rate calculations; iii. Forecast/actual precipitation data; and iv. Subsurface tile monitoring records (if applicable).
	☐	**Bulk EQ Only** - A description detailing how the agronomic rate is met at each beneficial use site, including how the beneficial use application equipment is calibrated.
	☐ ☐	**Bulk EQ Only** - When beneficial use occurs on a beneficial use site: i. The date the bulk EQ biosolids were beneficially used ; and ii. The quantity (dry tons) of EQ biosolids that were beneficially used.

Comments:

2/20/2012
→ Sludge sampled in early 2012, 840,000 gallons hauled early 2012
→ 1/11/2012 sludge hauled in

Class B

→ No paperwork from Midwest Compost

☐ The following analytical results:

☐	Arsenic	☐	Cadmium
☐	Copper	☐	Lead
☐	Mercury	☐	Molybdenum
☐	Nickel	☐	Selenium
☐	Zinc	☐	Total Kjeldahl Nitrogen
☐	Ammonia Nitrogen	☐	Total Phosphorus
☐	Total Potassium		

Standard Operating Procedure, including:
- ☐ i. Sample collection or monitoring locations;
- ☐ ii. The frequency at which sample collection or monitoring is to occur;
- ☐ iii. Sample collection or monitoring procedures;
- ☐ iv. Sample storage and preservation procedures;
- ☐ v. Sample or monitoring analysis procedures; and
- ☐ vi. Any calculations required for sample or monitoring analysis.

☐ An example of the notice and necessary information

☐ Copies of all crop year reports

Copies of the following:
- ☐ i. The application for an authorization for a beneficial use site; and
- ☐ ii. The Ohio EPA beneficial use site authorization letter for each beneficial use site.

☐ Records showing that Class B biosolids were not stored ≥90 days at the beneficial use site.

The following beneficial use site records:
- ☐ i. The soil pH for each beneficial use site;
- ☐ ii. The soil phosphorous levels for each beneficial use site;
- ☐ iii. The agronomic rate calculations for each beneficial use site;
- ☐ iv. Forecast/actual precipitation data;
- ☐ v. Subsurface tile monitoring records (if applicable); and
- ☐ vi. The sign placement records for all authorized beneficial use sites.

☐ A description detailing how the agronomic rate is met at each beneficial use site, including how the beneficial use application equipment is calibrated.

When beneficial use of class B biosolids occurs on a beneficial use site:

	☐ ☐	i. The date the class B biosolids were beneficially used ; and ii. The quantity (dry tons) of class B biosolids that were beneficially used.
	☐	The total amount of acreage on the beneficial use site where beneficial use of biosolids occurred.
→ Knifing – Injecting when applying	☐ ☐	**If performing VAR-9**, a narrative description that contains the following: i. The equipment utilized to inject the biosolids; and ii. How the beneficial user ensures that there is not a significant amount of the biosolids present on the surface of the authorized beneficial use site.
	☐ ☐ ☐ ☐	**If performing VAR-10**, a narrative description that contains the following: i. The date and time the sewage sludge was delivered to the authorized beneficial use site; ii. The date and time Class B biosolids were incorporated into the soil of the authorized beneficial use site; iii. The equipment utilized to incorporate the biosolids; and iv. How the beneficial user ensures that the biosolids are mixed with soil to a minimum depth of four inches or greater on the authorized beneficial use site.

Comments: No Records to document compliance with testing and land application requirements

CPLR
(Note: Class B Section Must be Completed)

☐ ☐ ☐ ☐ **CPLR Only**, the following records:

i. Location of each CPLR beneficial use site;
ii. Total acres of each CPLR beneficial use site;
iii. Date of beneficial use;
iv. Cumulative amount (lbs/acre):

	Parameter	CPLR		Parameter	CPLR
☐	Arsenic	36.6	☐	Cadmium	34.8
☐	Copper	34.8	☐	Copper	1339.9
☐	Lead	267.9	☐	Mercury	15.2
☐	Nickel	375.1	☐	Zinc	2500.4

☐ v. The total amount (dry tons) of biosolids beneficially used; and
☐ vi. CPLR beneficial user certification statement.

☐ ☐ ☐ **CPLR Only**, Copy of notification submitted to Ohio EPA that includes:
i. Location of each CPLR beneficial use site;
ii. Generator name;

	☐ ☐ ☐	iii. Generator address; iv. Generator telephone number; and v. Generator NPDES permit number
Comments:		

11. Monitoring Information

Where does biosolids sample collection occur?	Describe: Loading area at WWTP			
Who collects the biosolids samples?	Bill			
What are the biosolids sample preservation/shipping procedures?	Describe: Taken directly to Jones and Henry			
Is a chain of custody utilized?	yes			
At what frequencies are biosolids samples collected?	☒	Annually	☐	Semi-Annually
	☐	Quarterly	☐	Monthly
	☐	Other:		
Comments:				

12. Analytical Information

If the generator is performing fecal coliform monitoring, are fecal coliform samples analyzed within eight hours of collection?	☐	Yes
	☒	No
	If no, describe current process: Sampling not done	
Does the generator perform in-house analyses?	☐	Yes
	☒	No
	If yes, list in-house analyses performed:	
Does the generator utilize a contracted laboratory to perform analyses?	☒	Yes
	☐	No
	If yes, list contracted analyses performed: Jones and Henry	

Provide the contracted laboratory information:	Lab Name:	Jones and Henry
	Contact:	
	Address:	
	Phone:	
	Email:	

13. Methods Verification

Fecal Coliform - Is Standard Methods 9221E or 9222D utilized?	☐	Yes
	☐	No
	If no, describe current method:	
Enteric Viruses - Is ASTM D 4994-89 utilized? N/A	☐	Yes
	☐	No
	If no, describe current method:	
Helminth ova - Is Yanko, W.A. "Occurrence of Pathogens in Distribution and Marketing Municipal Sludges" utilized? N/A	☐	Yes
	☐	No
	If no, describe current method:	
Salmonella sp. Bacteria - Is Standard Methods 960D or Kenner, B.A and H.P Clark "Detection and Enumeration of Salmonella and Pseudomonas aeruginosa" utilized? N/A	☐	Yes
	☐	No
	If no, describe current method:	
Inorganic Metals - Is SW-846 utilized?	☐	Yes
	☐	No
	If no, describe current method: Not able to evaluate	
Specific Oxygen Uptake Rate - Is Standard Methods 2710B utilized? N/A	☐	Yes
	☒	No
	If no, describe current method:	
Total, Fixed and Volatile Solids - Is Standard Methods 2710B utilized?	☐	Yes
	☐	No

Not able to determine

	If no, describe current method:

Notes: