

Dinsmore & Shohl LLP
ATTORNEYS

Kevin P. Braig
937-449-6456
kevin.braig@dinslaw.com

May 30, 2007

VIA FEDERAL EXPRESS

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

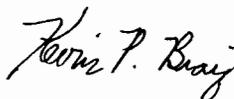
Re: In the Matter of Logan County Water Pollution Control District (Docket No. CWA-05-2007-0004)

Dear Madam or Sir::

Please find enclosed an Answer to Amended Administrative Complaint and Request for Hearing and two (2) copies thereof for the above-referenced case. I request that you return one of a time-stamped file copy of this document to me in the enclosed envelope.

If you have any questions relating to this matter, please do not hesitate to contact me.

Sincerely,



Kevin P. Braig

cc: Diana L. Embil
Associate Regional Counsel
Office of the Regional Counsel (Mail Code C-14J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF LOGAN : DOCKET NO. CWA-05-2007-0004
COUNTY WATER POLLUTION :
CONTROL DISTRICT : **ANSWER TO AMENDED**
Respondent : **ADMINISTRATIVE COMPLAINT**
AND **REQUEST FOR HEARING**

Now comes Respondent Logan County Water Pollution Control District ("Respondent"), by and through counsel, and, pursuant to Section 309(g) of the Clean Water Act, 33 U.S.C. § 1319(g), requests a hearing to contest the material facts of the Amended Administrative Complaint and the appropriateness of the proposed penalty. For its answer to the Amended Administrative Complaint, Respondent states as follows:

FIRST DEFENSE

1. Respondent admits the allegations of Paragraphs 1-6 of the Amended Administrative Complaint.
2. With respect to the allegations contained in Paragraph 7 of the Amended Administrative Complaint, Respondent admits that the U.S. EPA Administrator promulgated Part 503 regulations in 1993, but denies that the U.S. EPA Administrator provided any personal notice of the promulgation of the Part 503 regulations to Respondent or provided any personal notice to Respondent's personnel of the promulgation of the Part 503 regulations.
3. Respondent admits the allegations contained in Paragraphs 8-11 of the Amended Administrative Complaint.
4. With respect to the allegations contained in Paragraph 12 of the Amended Administrative Complaint, Respondent admits that its method for disposing of 242.3 metric tons of dry sewage sludge was land application for the 15-month period from April 17, 2002 through June

30, 2003 (See Exhibit 1 and Exhibit 2 attached hereto). To the extent the allegations contained in Paragraph 12 of the Amended Administrative Complaint are not expressly admitted herein, Respondent denies the allegations.

5. With respect to the allegations contained in Paragraph 13 of the Amended Administrative Complaint, Respondent admits that it land applied 242.3 metric tons of dry sewage sludge during the 15-month period from April 17, 2002 through June 30, 2003 (See Exhibit 1 and Exhibit 2 attached hereto). To the extent the allegations contained in Paragraph 13 of the Amended Administrative Complaint are not expressly admitted herein, Respondent denies the allegations.

6. Respondent is without information sufficient to admit or deny the allegations contained in Paragraph 14 of the Amended Administrative Complaint and therefore denies the allegations.

7. The allegations contained in Paragraphs 15-17 of the Amended Administrative Complaint constitute conclusions of law and Respondent is without information sufficient to admit or deny the allegations contained in Paragraphs 15-17 of the Amended Administrative Complaint and therefore denies the allegations.

8. Respondent admits the allegations contained in Paragraph 18 of the Amended Administrative Complaint.

9. With respect to the allegations contained in Paragraphs 19-20 of the Amended Administrative Complaint, Respondent admits that, according to the Ohio EPA, Ohio NPDES permits have included 40 C.F.R. 503 compliant monitoring stations since 1993 and that Ohio adopted rules and regulations for sewage sludge management in 2000 and 2002, respectively, but that U.S. EPA did not technically approve and delegate sewage sludge management to Ohio EPA as part of the Ohio NPDES program until 2005. (See Exhibit 3 attached hereto). Respondent further

admits that, in fact, the Ohio EPA administered Respondent's "Sludge Storage/Disposal" practices as part of the Ohio EPA's administration of its National Pollutant Discharge Elimination System (NPDES) permit program prior to 2005. Respondent further admits that in 1996 and 1997 the Ohio EPA conducted NPDES compliance inspections of Respondent's POTW and found Respondent's "Sludge Storage/Disposal" practices to be "Satisfactory" and that the Ohio EPA never informed Respondent thereafter that its "Sludge Storage/Disposal" practices were "Unsatisfactory." (See Exhibit 4 and Exhibit 5 attached hereto). Respondent further admits that during the time period from April 17, 2002 through June 30, 2003, the Ohio EPA did not evaluate Respondent's "Sludge Storage/Disposal" practices. (See Exhibit 4 and Exhibit 5). Respondent is without information sufficient to admit or deny the balance of the allegations contained in Paragraphs 19-20 of the Amended Administrative Complaint and therefore denies the allegations to the extent they are not expressly admitted herein.

10. With respect to the allegations contained in Paragraph 21 of the Amended Administrative Complaint, Respondent admits that the underlying conduct at issue occurred between April 17, 2002 and June 30, 2003. Respondent is without information sufficient to admit or deny the balance of the allegations contained in Paragraph 21 of the Amended Administrative Complaint and therefore denies the allegations to the extent they are not expressly admitted herein.

11. With respect to the allegations contained in Paragraph 22 of the Amended Administrative Complaint, Respondent admits that, according to the Ohio EPA, Ohio NPDES permits have included 40 C.F.R. 503 compliant monitoring stations since 1993 and that Ohio adopted rules and regulations for sewage sludge management in 2000 and 2002, respectively, but that U.S. EPA did not technically approve and delegate sewage sludge management to Ohio EPA as part of the Ohio NPDES program until 2005. (See Exhibit 3 attached hereto). Respondent further

admits that, in fact, the Ohio EPA administered Respondent's "Sludge Storage/Disposal" practices as part of the Ohio EPA's administration of its National Pollutant Discharge Elimination System (NPDES) permit program prior to 2005. Respondent further admits that in 1996 and 1997 the Ohio EPA conducted NPDES compliance inspections of Respondent's POTW and found Respondent's "Sludge Storage/Disposal" practices to be "Satisfactory" and that the Ohio EPA never informed Respondent thereafter that its "Sludge Storage/Disposal" practices were "Unsatisfactory." (See Exhibit 4 and Exhibit 5 attached hereto). Respondent further admits that during the time period from April 17, 2002 through June 30, 2003, the Ohio EPA did not evaluate Respondent's "Sludge Storage/Disposal" practices. (See Exhibit 4 and Exhibit 5). Respondent is without information sufficient to admit or deny the balance of the allegations contained in Paragraph 22 of the Amended Administrative Complaint and therefore denies the allegations to the extent they are not expressly admitted herein.

13. With respect to the allegations contained in Paragraph 23 of the Amended Administrative Complaint, Respondent incorporates its responses in Paragraphs 1-22 as if fully restated herein.

14. Respondent admits the allegations contained in Paragraph 24 of the Administrative Complaint.

15. With respect to the allegations contained in Paragraphs 25-26 of the Amended Administrative Complaint, Respondent admits that it submitted annual sewage sludge reports to the Ohio EPA for the years 2002 and 2003. Plaintiff further states that the allegations contained in Paragraphs 25-26 of the Amended Administrative Complaint constitute conclusions of law and Respondent is without information sufficient to admit or deny the allegations contained in Paragraphs 25-26 of the Amended Administrative Complaint and therefore denies the allegations.

16. With respect to the allegations contained in Paragraph 27 of the Amended Administrative Complaint, Respondent admits that it did not submit annual sludge reports to the U.S. EPA for years 2002 and 2003, but states that it submitted annual sludge reports to the Ohio EPA for years 2002 and 2003. (See Exhibit 1 and Exhibit 2 attached hereto).

17. Respondent is without information sufficient to admit or deny the allegations contained in Paragraph 28 of the Amended Administrative Complaint and therefore denies the allegations.

18. Respondent denies the allegations contained in Paragraph 29 of the Amended Administrative Complaint.

19. With respect to the allegations contained in Paragraph 30 of the Amended Administrative Complaint, Respondent incorporates its responses in Paragraphs 1-29 as if fully restated herein.

20. The allegations contained in Paragraph 31 of the Amended Administrative Complaint constitute conclusions of law and Respondent is without information sufficient to admit or deny the allegations contained in Paragraph 31 of the Amended Administrative Complaint and therefore denies the allegations.

21. With respect to the allegations contained in Paragraph 32 of the Amended Administrative Complaint, Respondent admits that during the 15-month period between April 17, 2002 and June 30, 2003, Respondent disposed of 242.3 metric tons of dry sewage sludge on land Respondent owned that is adjacent to the POTW and restricted to unauthorized personnel. To the extent the allegations contained in Paragraph 32 of the Administrative Complaint are not expressly admitted herein, the allegations are denied.

22. The allegations contained in Paragraph 33 of the Amended Administrative Complaint constitute conclusions of law and Respondent is without information sufficient to admit or deny the allegations contained in Paragraph 33 of the Amended Administrative Complaint and therefore denies the allegations.

23. Respondent admits the allegations contained in Paragraphs 34-42 of the Amended Administrative Complaint.

24. Respondent is without sufficient information to admit or deny the allegations contained in Paragraph 43 of the Amended Administrative Complaint and therefore denies the allegations.

25. With respect to the allegations contained in Paragraph 44 of the Amended Administrative Complaint, Respondent incorporates its responses in Paragraphs 1-43 as if fully restated herein.

26. The allegations contained in Paragraphs 45-46 of the Amended Administrative Complaint constitute conclusions of law and Respondent is without information sufficient to admit or deny the allegations contained in Paragraphs 45-46 of the Amended Administrative Complaint and therefore denies the allegations.

27. Respondent denies the allegations contained in Paragraphs 47-48 of the Amended Administrative Complaint.

28. With respect to the allegations contained in Paragraph 49 of the Amended Administrative Complaint, Respondent incorporates its responses in Paragraphs 1-48 as if fully restated herein.

29. The allegations contained in Paragraphs 50-52 of the Amended Administrative Complaint constitute conclusions of law and Respondent is without information sufficient to admit

or deny the allegations contained in Paragraphs 50-52 of the Amended Administrative Complaint and therefore denies the allegations.

30. Respondent admits that allegations contained in Paragraph 54 of the Amended Administrative Complaint.

31. Respondent denies the allegations contained in Paragraphs 55-56 of the Amended Administrative Complaint.

SECOND DEFENSE

32. Respondent denies the appropriateness of the proposed civil penalty and states that U.S. EPA had not provided Respondent with any calculation of how the proposed penalty was calculated and requests U.S. EPA to provide such a calculation pursuant to 40 CFR § 22.19(a)(3).

THIRD DEFENSE

33. The U.S. EPA's claims are barred by the applicable statute of limitations to the extent any claims are based on conduct or omissions occurring prior to April 17, 2002.

FOURTH DEFENSE

34. The U.S. EPA's claims are barred by the doctrine of equitable estoppel as Respondent filed sewage sludge reports with the Ohio EPA.

FOURTH DEFENSE

35. Defendant reserves the right to amend this answer and supplement this answer and the materials being provided herewith and to identify and call fact witnesses pursuant to a pre-hearing information exchange schedule established by the Presiding Officer at a pre-hearing conference. See 40 C.F.R. § 22.19(b).

FIFTH DEFENSE

36. Defendant requests a hearing on all matters alleged in the administrative complaint.

Respectfully submitted,

By Kevin P. Braig
Kevin P. Braig (OH: 061816)
DINSMORE & SHOHL, LLP
One Dayton Centre
One South Main Street - Suite 1300
Dayton, Ohio 45402
PH: (937) 449-6456
kevin.braig@dinslaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing answer and request for hearing was served upon the following persons by the following methods on this 30th day of May, 2007:

VIA FEDERAL EXPRESS

Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

VIA FEDERAL EXPRESS

Diana L. Embil
Associate Regional Counsel
Office of the Regional Counsel (Mail Code C-14J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Kevin P. Braig
Kevin P. Braig



Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Table 1: Sewage Sludge Use or Disposal

Please Type

Facility Name: Indian Lake Water Pollution Control District	Date: 1-9-03
Ohio EPA Permit #: 1PK00002*DD	NPDES Application #: OH 0036641

Values Reported for Calendar Year 2002								
	84368 Pathogen Class	84369 Pathogen Alternative	46397 PFRP Option	46396 PSRP Option	84370 VAR Option	70316 Sludge Weight (dry tons)	51129 Biosolids Weight (dry tons)	80991 Sludge Volume (gallons)
Land Application	B	2		3	1	222		
Land Application								
Land Application								
Land Application								
Land Application								
PPG Lime Lakes								
Incineration								
Landfill								
Lagoon								
To Another Facility								
Circle if no sludge removed.								





Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Table 2 Continued: Sewage Sludge Constituents

Please Type

Facility Name: Indian Lake Water Pollution Control District	Date: 1-8-03
Ohio EPA Permit #: 1PK00002*DD	NPDES Application #: OH 0036641

Values Reported for Calendar Year 2002									
		00627 TKN (mg/kg)	00611 NH ₃ -N (mg/kg)	00668 P (mg/kg)	00938 K (mg/kg)	00400 pH (S.U.)	70318 TS (%)	70322 VS (%)	70316 Sludge Wt. (dry tons)
Jan	Max						15	54	
	Avg						15	54	8.2
	Min						15	54	
Feb	Max						20	59	
	Avg						18.5	59	19.5
	Min						17	59	
Mar	Max	42600	8560	18000		7.6	16	58	
	Avg	42600	8560	18000			16	58	10
	Min	42600	8560	18000		7.6	16	58	
Apr	Max								
	Avg								0
	Min								
May	Max						18	53	
	Avg						18	53	2.5
	Min						18	53	
Jun	Max	42300	10600	19500		7.9	17	49	
	Avg	42300	10600	19500			17	49	8.6
	Min	42300	10600	19500		7.9	17	49	
Jul	Max								
	Avg								0
	Min								
Aug	Max	33600	7040	15900		7.6	19	51	
	Avg	33600	7040	15900			18	45	30
	Min	33600	7040	15900		7.6	17	39	
Sep	Max						20	53	
	Avg						18	46	33.7
	Min						16	34	
Oct	Max						19	55	
	Avg						18	47	66.2
	Min						16	33	
Nov	Max						18	47	
	Avg						18	45	33.2
	Min						18	43	
Dec	Max	37200	8220	18500		6.7	18	59	
	Avg	37200	8220	18500			18	59	9.8
	Min	37200	8220	28500		6.7	18	59	
Total	Max	42600	10600	19500		7.9	20	59	
	Avg	38925	8605	17975			17.5	51.5	222
	Min	33600	7040	15900		6.7	15	33	



Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Table 2: Sewage Sludge Constituents

Please Type

Facility Name: Indian Lake Water Pollution Control District	Date: 1-8-03
Ohio EPA Permit #: 1PK00002*DD	NPDES Application #: OH 0036641

Values Reported for Calendar Year 2002												
		01003 As (mg/kg)	01013 Be (mg/kg)	01028 Cd (mg/kg)	01029 Cr (mg/kg)	01043 Cu (mg/kg)	01052 Pb (mg/kg)	01068 Ni (mg/kg)	01093 Zn (mg/kg)	01148 Se (mg/kg)	71921 Hg (mg/kg)	78465 Mo (mg/kg)
Jan	Max											
	Avg											
	Min											
Feb	Max											
	Avg											
	Min											
Mar	Max											
	Avg											
	Min											
Apr	Max											
	Avg											
	Min											
May	Max											
	Avg											
	Min											
Jun	Max											
	Avg	12		3	24	480	44	27	1100	AA	.931	38
	Min											
Jul	Max											
	Avg											
	Min											
Aug	Max											
	Avg											
	Min											
Sep	Max											
	Avg											
	Min											
Oct	Max											
	Avg											
	Min											
Nov	Max											
	Avg											
	Min											
Dec	Max											
	Avg	AA		AA	31	810	55	28	1500	AA	.78	56
	Min											
Total	Max	12		3	31	810	55	28	1500	AA	.931	56
	Avg	12		3	27.5	645	49.5	27.5	1300	AA	.856	47
	Min	12		3	24	480	44	27	1100	AA	.78	38



Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
P.O. Box 1049
Columbus, Ohio 43216-1049

Certification Statement

Please Type

Facility Name: Indian Lake Water Pollution Control District		Date: 1-8-03
Ohio EPA Permit #: 1PK00002*DD	NPDES Application #: OH 0036641	
Mailing Address: P O Box 1550		
City, State, Zip Code: Russels Point, OHio 43348		
Signature of Responsible Official:		

"I certify, under penalty of law, that the information transmitted by this Annual Sludge Report 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."

Thomas W. Weer
Signature

Date: 1 / 8 / 03

Thomas W. Weer
Printed Name

Operation Mgr.
Title

Were you inspected by USEPA last year? Y X N Date: / /

Certification statements should be signed in accordance with paragraph 3745-31-04 of the Ohio Administrative Code:

1. In the case of a corporation, by a principal executive officer of at least the level of vice-president, or his duly authorized representative (in writing), if such representative is responsible for the overall operation of the facility;
2. In the case of a partnership, by a general partner;
3. In the case of a sole proprietorship, by the proprietor;
4. In the case of a municipal, state, federal or other government facility, by the principal executive officer, the highest ranking elected official, or the duly authorized employee.

Order # 02-08-765
09/19/02 13:07

Page 2

TEST RESULTS BY SAMPLE

Sample Description: SOLIDS 08/16 0800 Lab No: 01A
 Test Description: DIOXINS AND PCBS Method: 1668 / 1613 Test Code: DI_PCB
 Collected: 08/16/02 Category: SOLIDS

PARAMETER	RESULT	LIMIT
TOTAL TCDD	BDL	9.3
TOTAL PeCDD	BDL	689
TOTAL HxCDD	24.0	5.8
TOTAL HpCDD	188	14.4
OCDD	988	28.7
TOTAL TCDF	BDL	2.0
TOTAL PeCDF	BDL	10.1
TOTAL HxCDF	28.6	3.9
TOTAL HpCDF	98.2	9.1
OCDF	105	23.9
2,3,7,8-TCDD	BDL	2.5
2,3,7,8-TCDF	BDL	2.0
1,2,3,7,8-PeCDD	BDL	4.0
1,2,3,7,8-PeCDF	BDL	2.6
2,3,4,7,8-PeCDF	BDL	2.9
1,2,3,4,7,8-HxCDD	BDL	6.1
1,2,3,6,7,8-HxCDD	BDL	5.8
1,2,3,7,8,9-HxCDD	BDL	5.6
1,2,3,4,7,8-HxCDF	BDL	3.3
1,2,3,6,7,8-HxCDF	BDL	3.5
1,2,3,7,8,9-HxCDF	BDL	5.6
2,3,4,6,7,8-HxCDF	BDL	4.1
1,2,3,4,6,7,8-HpCDD	102	14.4
1,2,3,4,6,7,8-HpCDF	55.3	7.1
1,2,3,4,7,8,9-HpCDF	BDL	12.7
3,3',4,4'-TCB	197	15.2
3,4,4',5-TCB	BDL	18.6
3,3',4,4',5-PeCB	BDL	27.2
2,3,3',4,4'-PeCB	1460	27.1
2,3',4,4',5-PeCB	3560	25.7
2',3,4,4',5-PeCB	831	29.1
2,3,4,4',5-PeCB	BDL	27.8
3,3',4,4',5,5'-HxCB	BDL	53.5
2,3,3',4,4',5-HxCB	554	50.1
2,3,3',4,4',5'-HxCB	BDL	50.1
2,3',4,4',5,5'-HxCB	216	48.6



Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
P.O. Box 1049
Columbus, Ohio 43216-1049

FILE COPY

Certification Statement

Please Type

Facility Name: Indian Lake Water Pollution Control		Date: 1/13/04
Ohio EPA Permit #: 1PK00002*GD	NPDES Application #: OH0036641	
Mailing Address: P.O.Box 1550 Russells Point, Ohio 43348		
City, State, Zip Code Russells Point, Ohio 43348		
Signature of Responsible Official: <i>Hans E. Pugh</i>		

"I certify, under penalty of law, that the information transmitted by this Annual Sludge Report 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."

Hans E. Pugh
Signature

Date: 01/16/04

Printed Name

Title

Were you inspected by USEPA last year? Y X N Date: / /

Certification statements should be signed in accordance with paragraph 3745-31-04 of the Ohio Administrative Code:

1. In the case of a corporation, by a principal executive officer of at least the level of vice-president, or his duly authorized representative (in writing), if such representative is responsible for the overall operation of the facility;
2. In the case of a partnership, by a general partner;
3. In the case of a sole proprietorship, by the proprietor;
4. In the case of a municipal, state, federal or other government facility, by the principal executive officer, the highest ranking elected official, or the duly authorized employee.



Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Table 1: Sewage Sludge Use or Disposal

Please Type

Facility Name: Indian Lake Water Pollution Control	Date: 1/13/04
Ohio EPA Permit #: 1PK00002*GD	NPDES Application #: OH 0036641

Values Reported for Calendar Year 2003								
	84368 Pathogen Class	84369 Pathogen Alternative	46397 PFRP Option	46396 PSRP Option	84370 VAR Option	70316 Sludge Weight (dry tons)	51129 Sludge Fee Weight (dry tons)	80991 Sludge Volume (gallons)
Land Application	B	2		3	1	58		
Land Application								
Land Application								
Land Application								
Land Application								
PPG Lime Lakes								
Incineration								
Landfill						57		
Lagoon								
To Another Facility								
Circle if no sludge removed.								





Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Table 2 Continued: Sewage Sludge Constituents

Please Type

Facility Name: Indian Lake Water Pollution Control	Date: 01/14/04
Ohio EPA Permit #: 1PK00002*GD	NPDES Application #: OH 0036641

Values Reported for Calendar Year 2003		00627 TKN (mg/kg)	00611 NH ₃ -N (mg/kg)	00668 P (mg/kg)	00938 K (mg/kg)	00400 pH (S.U.)	70318 TS (%)	70322 VS (%)	70316 Sludge Wt. (dry tons)
Jan	Max								
	Avg								
	Min								
Feb	Max						22	59	
	Avg						17.3	57	8.2
	Min						13	54	
Mar	Max	55200	7940	20700		7.45	19	60	
	Avg	55200	7940	20700		7.45	17.8	49.5	10.7
	Min	55200	7940	20700		7.45	17	39	
Apr	Max					7.31	23	60	
	Avg						17.6	58.4	20.1
	Min					7.00	15	57	
May	Max						16	57	
	Avg						16	57	1.3
	Min						16	57	
Jun	Max	25000	9100	18200		7.26	19	57	
	Avg	25000	9100	18200			17.2	56.3	17.7
	Min	25000	9100	18200		7.00	14	56	
Jul	Max								
	Avg								
	Min								
Aug	Max					7.47	29.0	53	
	Avg						20.3	53	6.2
	Min					7.03	12.0	53	
Sep	Max					8.49	21	52	
	Avg						20	50.8	16
	Min					6.91	19	48	
Oct	Max					8.56	22	54	
	Avg						20.4	50.8	1.3
	Min					6.99	19	49	
Nov	Max					7.44	19	49	
	Avg						19	49	6.6
	Min					7.44	19	49	
Dec	Max					8.15	20.5	51	
	Avg						17.6	49.3	26.9
	Min					6.85	15.5	48	
Total	Max	55200	9100	20700			29.0	60	
	Avg	40100	8520	19450			18.3	53.1	115
	Min	25000	7940	18200			12.0	39	



Annual Sewage Sludge Report Form

DIVISION OF SURFACE WATER
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Table 2: Sewage Sludge Constituents

Please Type

Facility Name: Indian Lake Water Pollution Control	Date: 01/14/04
Ohio EPA Permit #: 1PK00002*GD	NPDES Application #: OH 0036641

Values Reported for Calendar Year 2003

		01003 As (mg/kg)	01013 Be (mg/kg)	01028 Cd (mg/kg)	01029 Cr (mg/kg)	01043 Cu (mg/kg)	01052 Pb (mg/kg)	01068 Ni (mg/kg)	01093 Zn (mg/kg)	01148 Se (mg/kg)	71921 Hg (mg/kg)	78465 Mo (mg/kg)
Jan	Max											
	Avg											
	Min											
Feb	Max											
	Avg											
	Min											
Mar	Max											
	Avg											
	Min											
Apr	Max											
	Avg											
	Min											
May	Max											
	Avg											
	Min											
Jun	Max	10		3.1	31	650	47	28	1200	AA	.67	37
	Avg	10		3.1	31	650	47	28	1200	AA	.67	37
	Min	10		3.1	31	650	47	28	1200	AA	.67	37
Jul	Max											
	Avg											
	Min											
Aug	Max											
	Avg											
	Min											
Sep	Max											
	Avg											
	Min											
Oct	Max	AA		AA	6.5	130	11	6.7	270	AA	.23	6.8
	Avg	AA		AA	6.5	130	11	6.7	270	AA	.23	6.8
	Min	AA		AA	6.5	130	11	6.7	270	AA	.23	6.8
Nov	Max											
	Avg											
	Min											
Dec	Max	AA		AA	6.9	140	14	6.2	280	AA	AA	8.4
	Avg	AA		AA	6.9	140	14	6.2	280	AA	AA	8.4
	Min	AA		AA	6.9	140	14	6.2	280	AA	AA	8.4
Total	Max	10		3.1	31	650	47	28	1200		.67	37
	Avg	10		3.1	14.8	307	24	13.6	583	AA	.45	17.4
	Min	AA		AA	6.5	130	11	6.2	270		AA	6.8

Flat Branch District
937-843-2632

Administrative Office
Logan County Water Pollution Control

Indian Lake District
937-843-3328

January 14, 2004

PO Box 1550, Russells Point, OH 43348
937-843-3669 Facsimile

Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Sir or Madam:

Subject: Logan County Water Pollution Control District 2003 Annual Sewage Sludge Reports

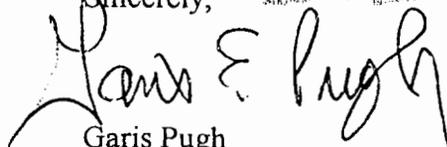
Attached you will find Table 1, Table 2, Form 4229 and the Certification Statement forms for both Indian Lake Water Pollution Control and Flat Branch Wastewater Treatment Plant (WWTP) as required for the Sewage Sludge Annual Report.

Indian Lake land applied Sewage Sludge the first half of 2003 and is presently hauling all sludge to Cherokee Run Landfill located outside Bellefontaine, Ohio. No problems were encountered during 2003 for land application or landfill disposal.

Flat Branch WWTP had no sludge disposed of off site. All sludge remains on the sand drying beds. When disposal is warranted, this sludge will be hauled off site to the Indian Lake WWTP for final disposal.

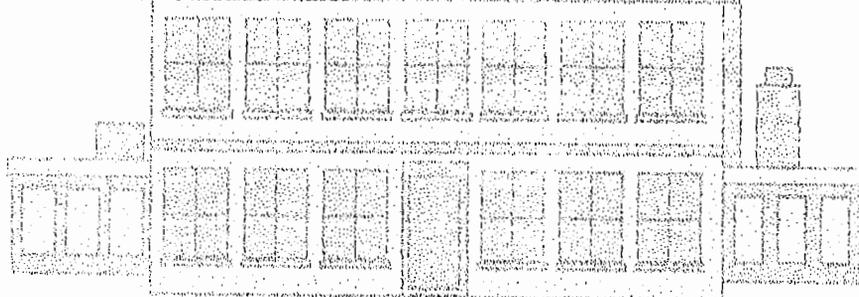
If you have any questions or comments, please do not hesitate to contact our office.

Sincerely,



Garis Pugh
General Manager, Indian Lake Water Pollution Control District

Cc: OEPA Division of Surface Water



Permit Guidance 11 Final	National Pollutant Discharge Elimination System (NPDES); Monitoring and Reporting for Sewage Sludge	
	Statutory references: ORC 6111.01, 6111.03, 6111.04 Rule references: OAC 3745-33, 3745-40	Ohio EPA, Division of Surface Water Revision 0, April 15, 2005
This internal guidance does not affect requirements found in referenced rule or statute.		

Purpose

To provide guidance for drafting the sewage sludge parts of a new NPDES permit or when renewing an existing NPDES permit.

Background

Ohio NPDES permits have included 40 C.F.R. 503 compliant monitoring stations since 1993. Ohio adopted laws and rules for sewage sludge management in 2000 and 2002 respectively. Sewage sludge management was delegated to Ohio EPA as part of the NPDES permit program in 2005. The information in this guidance document is consistent with ORC Chapter 6111. and OAC Chapter 3745-40.

Procedure

Station tables, and the accompanying footnotes, outline the monitoring frequency requirements for sewage sludge disposal, use, storage, or treatment, by publicly owned treatment works and semi-public treatment works. Monitoring frequency requirements for sewage sludge stations are based on the dry weight of sewage sludge used or disposed in the most recent calendar year for which records are available. Monthly Operating Report (MOR) codes in **bold face** type are parameters that are required of any Permittee with such a sewage sludge station. Other parameters may be included on a case-by-case basis. On a case-by-case basis, monitoring may be necessary for parameters not listed in this guidance. In cases where additional monitoring is necessary, or when the proposed monitoring requirements are different from those of this guidance, the permit writer should document reasons for the changes. NPDES permit Part II and Part III guidance for sewage sludge is also provided in this document. Facsimile NPDES Part 1 stations are included as an appendix.

Industrial NPDES Permittee's may operate a domestic sewage package plant that is separate from the process wastewater collection and treatment system. If a permit writer is aware of such a situation, the industrial permit should have, at a minimum, a 586 station and/or a 588 station for the final disposal of sewage sludge removed from such treatment works.

Cross Reference

Permit Guidance 1 - National Pollutant Discharge Elimination System; Monitoring Frequency Requirements for Sanitary Discharges.

For More Information, Contact:

Ohio EPA, Division of Surface Water
Sewage Sludge Management Program
Chris Bowman (614) 644-2134 chris.bowman@epa.state.oh.us
Suzanne Matz (614) 644-2034 suzanne.matz@epa.state.oh.us



Station 581 - Monitoring requirements for land application of non-EQ sewage sludge

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)				
			≥16,500	≥1,650 but <16,500	≥320 but <1,650	≥70 but <320	<70
Weight (B)	US	70316	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T
Fee weight (C)	US	51129	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T
Metals (D)	mg/kg	varies	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Ammonia N	mg/kg	00611	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Kjeldahl N	mg/kg	00627	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
NO2/NO3 N (E)	mg/kg	00633	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Fecal coliform (F)	MPN/g	31641	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T
Fecal coliform (F)	CFU/g	51131	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T

Station 581 applies to land application of non-exceptional quality sewage sludge (the definition of “exceptional quality” is found in OAC rule 3745-40-01). Parameters in **bold** are required to be monitored by all Permittee’s with a 581 station. Monitoring of other parameters, whether listed above or not, is at the discretion of the Director and depends in part on the treatment choices made by the Permittee. For example, if the Permittee utilizes class B pathogen reduction alternative 1 then one of the two Fecal coliform monitoring options must be chosen. The MPN/g option is recommended.

It is recommended that NPDES permits with a 581 station also include a 586 station and/or a 588 station as backup sewage sludge management alternatives.

Station 582 - Monitoring requirements for storage of sewage sludge

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)
			Any amount
Weight (B)	US tons	70316	1/Year T

Station 582 may be included in an NPDES permit at the discretion of the Director. The parameters to be included are at the discretion of the Director. The purpose of a station 582 is to ensure continued protection of public health and the environment when sewage sludge is stockpiled, stored in a field, or stored at the generating facility, and to provide the ability to track wastewater treatment plant operations over time.

Station 583 is reserved.

Station 584 - Monitoring requirements for land application of EQ sewage sludge

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)				
			≥16,500	≥1,650 but <16,500	≥320 but <1,650	≥70 but <320	<70
Weight (B)	US tons	70316	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T
Fee weight (C)	US tons	51129	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T
Metals (D)	mg/kg	varies	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Ammonia N	mg/kg	00611	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Kjeldahl N	mg/kg	00627	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
NO2/NO3 N (E)	mg/kg	00633	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Fecal coliform (G)	MPN/g	31641	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Salmonella sp. (G)	MPN/4g	71202	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Enteric virus (H)	PFU/4g	81401	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C
Helminth ova (I)	#/4g	51130	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C

Station 584 applies to land application of exceptional quality sewage sludge (the definition of “exceptional quality sludge” is found in OAC rule 3745-40-01). Parameters in **bold** are required to be monitored by all Permittee’s with a 584 station. Monitoring of other parameters, whether listed above or not, is at the discretion of the Director. All Permittee’s must choose to monitor either Fecal coliform or Salmonella sp. to demonstrate pathogen reduction. The permit writer must determine which option the Permittee wishes to utilize and insert the choice in the 584 table.

It is recommended that all Permittee’s that generate an exceptional quality sewage sludge also have a 581 station, for non-exceptional quality sewage sludge, for the times when the sewage sludge may not meet “EQ” criteria but still can be land applied as a non-exceptional quality sewage sludge. Including a 586 and/or 588 station as further backup is recommended.

Station 585 - Monitoring requirements for incineration of sewage sludge

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)				
			≥16,500	≥1,650 but <16,500	≥320 but <1,650	≥70 but <320	<70
Fee weight (C)	US tons	51129	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T
Metals (J)	mg/kg	varies	2/Month C	1/Month C	1/Qtr C	2/Year C	1/Year C

Station 585 applies to incineration of sewage sludge. Parameters in **bold** are required to be monitored by all Permittee’s with a 585 station. Monitoring of other parameters would be included at the discretion of the Director.

Station 586 - Monitoring requirements for disposal of sewage sludge in a landfill

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)	
			Any amount	
Fee weight (C)	US tons	51129	1/Year T	

Station 586 applies to sewage sludge disposed in a landfill. Parameters in **bold** are required to be monitored by all Permittee's with a 586 station. Monitoring of other parameters, whether listed above or not, are included at the discretion of the Director. Permittee's with a 581 and/or 584 station are recommended to include a 586 station in their NPDES permit. The back-up ability to landfill sewage sludge is considered a prudent management practice.

Station 587 is reserved.

Station 588 - Monitoring requirements for transfer of sewage sludge to another NPDES permit holder

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)	
			Any amount	
Weight (B)	US tons	70316	1/Year T	
Volume (K)	Gals	80991	1/Year T	

Station 588 applies to sewage sludge transferred to another NPDES Permittee. Since OAC 3745-40 requires any person who disposes, uses, stores or treats sewage sludge to have an NPDES permit for the activity, sewage sludge should only be transferred to an NPDES permit holder whose permit allows for the disposal, use, storage, or treatment of sewage sludge. Permittee's with a 581 and/or 584 station are recommended to include a back-up 588 station in their NPDES permit. The annual total of sewage sludge transferred may be reported in dry tons, or gallons, at the discretion of the Director (gallons is often preferred especially for small treatment works that hire a waste hauler to remove relatively small volumes of sewage sludge).

Station 589 - Monitoring requirements for other disposal, use, storage, or treatment of sewage sludge

Parameter	Units (A)	MOR Code	Sewage sludge weight (U. S. dry tons per calendar year) (B)				
			≥16,500	≥1,650 but <16,500	≥320 but <1,650	≥70 but <320	<70
Weight (B)	US tons	70316	2/Month T	1/Month T	1/Qtr T	2/Year T	1/Year T

Station 589 should be used on a case-by-case basis, at the discretion of the Director, when sewage sludge disposal, use, storage, or treatment does not fit one of the other sewage sludge stations. The parameters to be included are at the discretion of the Director. Discharge limitations should reflect exceptional quality sewage sludge requirements or non-exceptional quality sewage sludge requirements, when applicable. Example: Some municipalities have been involved in a long term surface disposal project at the PPG Lime Lakes. Station 589 could be used to customize reporting requirements for the PPG Lime Lakes project.

Footnotes

C = composite, T = total

- (A) All units are dry weight basis (except Volume in gallons).
- (B) Weight means the weight of sewage sludge, in dry U.S. tons, including admixtures such as liming material or bulking agents. Sewage sludge monitoring frequency is based on the annual sewage sludge weight, in dry US tons, for the most recent calendar year per rule 3745-40-06 of the Ohio Administrative Code [Note: both Weight and Fee weight must be included as parameters for land application, incineration and landfill disposal sewage sludge stations. Ohio EPA must track Fee weight as per the ORC, and Weight for numerous reasons including Clean Water Act regulations (503)].
- (C) Fee weight means the weight of sewage sludge, in dry U.S. tons, excluding any admixtures such as liming material or bulking agents. Annual sewage sludge fees are based on the most recent calendar year generation of sewage sludge per Section 3745.11(Y) of the Ohio Revised Code [Note: both Weight and Fee weight must be included as parameters for land application, incineration and landfill disposal sewage sludge stations. Ohio EPA must track Fee weight as per the ORC, and Weight for numerous reasons including Clean Water Act regulations (503)].
- (D) The following metals shall be monitored when sewage sludge is applied to the land:
Arsenic, Total In Sludge - MOR code 01003
Cadmium, Total In Sludge - MOR code 01028
Copper, Total In Sludge - MOR code 01043
Lead, Total In sludge - MOR code 01052
Mercury, Total In Sludge - MOR code 71921
Molybdenum, Total In Sludge - MOR code 78465
Nickel, Total In Sludge - MOR code 01068
Selenium, Total In Sludge - MOR code 01148
Zinc, Total In Sludge - MOR code 01093
- (E) Monitoring for nitrite/nitrate nitrogen is recommended for composted sewage sludge, aerobically digested sewage sludge, and air dried sewage sludge. These aerobic processes promote the nitrification of ammonia. Other sewage sludge treatment processes do not promote the nitrification of significant ammonia and monitoring for nitrite/nitrate nitrogen is not required.
- (F) Monitoring for fecal coliform is required for class B pathogen reduction alternative 1. Seven separate composite samples of the sewage sludge, said samples recommended to be taken at two day intervals, shall be submitted for analysis using either the most probable number (MPN/g, MOR code 31641) method or the colony forming unit (CFU/g, MOR code 51131) method. The MPN/g method is recommended (further information on the methods of analysis, and the calculation of a geometric mean based on the analysis, is available in DSW Policy 0100.028). The number to be submitted on the MOR is the calculated total geometric mean of the seven representative samples.
- (G) Monitoring for fecal coliform (or Salmonella sp. bacteria, see below) is required for all class A pathogen reduction alternatives. For fecal coliform the most probable number (MPN/g, MOR code 31641) is the required monitoring methodology.

Salmonella sp. monitoring (MPN/4g, MOR code 71202) may be substituted for the fecal coliform monitoring for class A pathogen reduction alternatives. This is not recommended. Fecal coliform (MPN/g, MOR code 31641) is the recommended pathogen reduction monitoring method.

- (H) Monitoring sewage sludge for the presence of enteric virus is required for class A pathogen reduction alternative 3 and class A pathogen reduction alternative 4.
- (I) Monitoring sewage sludge for the presence of viable helminth ova is required for class A pathogen reduction alternative 3 and class A pathogen reduction alternative 4.
- (J) The following metals shall be monitored when sewage sludge is fired in an incinerator:
 - Arsenic, Total In Sludge - MOR code 01003
 - Beryllium, Total In Sludge - MOR code 01013
 - Cadmium, Total In Sludge - MOR code 01028
 - Chromium, Total In Sludge - MOR code 01029
 - Lead, Total In sludge - MOR code 01052
 - Mercury, Total In Sludge - MOR code 71921
 - Nickel, Total In Sludge - MOR code 01068
- (K) At the discretion of the Director, Permittee's may report sewage sludge gallons transferred to another facility rather than sewage sludge dry tons transferred to another facility. Total cumulative gallons transferred shall be tracked and reported annually.

Guidance for Part II, Other Parameters

The following paragraphs should be included in Part II for all POTWs that generate a sewage sludge:

"All disposal, use, storage, or treatment of sewage sludge by the Permittee shall comply with Chapter 6111. of the Ohio Revised Code, Chapter 3745-40 of the Ohio Administrative Code, any further requirements specified in this NPDES permit, and any other actions of the Director that pertain to the disposal, use, storage, or treatment of sewage sludge by the Permittee".

"Sewage sludge composite samples shall consist of six to twelve grab samples collected at such times and locations, and in such fashion, as to be representative of the facilities sewage sludge".

"No later than January 31 of each calendar year the Permittee shall submit two (2) copies of a report summarizing the sewage sludge disposal, use, storage, or treatment activities of the Permittee during the previous calendar year. One copy of the report shall be sent to the Ohio EPA, Division of Surface Water, P.O. Box 1049, Columbus, Ohio 43216-1049, and one copy of the report shall be sent to the appropriate Ohio EPA District Office. The report shall be submitted on Ohio EPA Form 4229".

"Each day when sewage sludge is removed from the wastewater treatment plant for use or disposal a representative composite sample of sewage sludge shall be collected and monitored for total solids. Results of the monitoring shall be used to calculate the total Sewage Sludge Weight (Monthly Operating Report code 70316) and total Sewage Sludge Fee Weight (Monthly Operating Report code 51129) for the reporting period specified by this NPDES permit. The results of the daily monitoring, and the weight calculations, shall be maintained on site for a minimum of five years. The test methodology used shall be Part 2540 G of Standard Methods for the Examination of Water and Wastewater, 18th Edition, 1992. To convert from gallons of liquid sewage sludge to dry tons of sewage sludge: $\text{dry tons} = \text{gallons} \times 8.34 \text{ (lbs/gallon)} \times 0.0005 \text{ (tons/lb)} \times \text{decimal fraction total solids}$ ".

The following information shall be included in Part II of each NPDES permit issued to a POTW that land applies class B pathogen reduction treated sewage sludge (below the "sampling station" information is suggested): a list of the counties in which the POTW proposes to land apply class B sewage sludge to authorized sites.

"The Permittee may request authorization of land application sites in the following Ohio counties:
County A
County B
etc."

The following paragraph should be included in Part II of each NPDES permit issued to a POTW that has an average daily final effluent flow of 100,000 gpd or greater, and that land applies sewage sludge (has a 581 and/or a 584 station).

"A grab sample of sewage sludge that has been treated to meet requirements for application to the land shall be monitored for dioxin, as the term dioxin is defined in rule 3745-40-01 of the Ohio Administrative Code, as per the monitoring frequency, methodologies and reporting requirements described in rule 3745-40-06 of the Ohio Administrative Code".

Guidance for Part III, General Conditions

The following definitions appear in Part III of NPDES permits.

1. "Sewage sludge" means a solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works as defined in section 6111.01 of the Revised Code. "Sewage sludge" includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes. "Sewage sludge" does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator, grit and screenings generated during preliminary treatment of domestic sewage in a treatment works, animal manure, residue generated during treatment of animal manure, or domestic septage.
2. "Sewage sludge weight" means the weight of sewage sludge, in dry U.S. tons, including admixtures such as liming materials or bulking agents. Monitoring frequencies for sewage sludge parameters are based on the reported sludge weight generated in a calendar year (use the most recent calendar year data when the NPDES permit is up for renewal).
3. "Sewage sludge fee weight" means the weight of sewage sludge, in dry U.S. tons, excluding admixtures such as liming materials or bulking agents. Annual sewage sludge fees, as per section 3745.11(Y) of the Ohio Revised Code, are based on the reported sludge fee weight for the most recent calendar year.

RECORDS RETENTION

The Permittee shall retain all of the following records for the wastewater treatment works for a minimum of three years except those records that pertain to sewage sludge disposal, use, storage, or treatment, which shall be kept for a minimum of five years, including:

1. All sampling and analytical records (including internal sampling data not reported);
2. All original recordings for any continuous monitoring instrumentation;
3. All instrumentation, calibration and maintenance records;
4. All plant operation and maintenance records;
5. All reports required by this permit; and
6. Records of all data used to complete the application for this permit for a period of at least three years, or five years for sewage sludge, from the date of the sample, measurement, report, or application.

SOLIDS DISPOSAL

Collected grit and screenings, and other solids other than sewage sludge, shall be disposed of in such a manner as to prevent entry of those wastes into waters of the state, and in accordance with all applicable laws and rules.

Appendix: The following tables are facsimiles of the default stations that will be available in SWIMS. Parameters may need to be added on a case-by-case basis.

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 581 - Non-EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Daily Maximum	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		1/Year	Composite	December
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		1/Year	Composite	December
01003 - Arsenic, Total In Sludge - mg/kg	75	1/Year	Composite	December
01028 - Cadmium, Total In Sludge - mg/kg	85	1/Year	Composite	December
01043 - Copper, Total In Sludge - mg/kg	4,300	1/Year	Composite	December
01052 - Lead, Total In Sludge - mg/kg	840	1/Year	Composite	December
01068 - Nickel, Total In Sludge - mg/kg	420	1/Year	Composite	December
01093 - Zinc, Total In Sludge - mg/kg	7,500	1/Year	Composite	December
01148 - Selenium, Total In Sludge - mg/kg	100	1/Year	Composite	December
51129 - Sludge Fee Weight - Dry Tons		1/Year	Total	December
70316 - Sludge Weight - Dry Tons		1/Year	Total	December
71921 - Mercury, Total In Sludge - mg/kg	57	1/Year	Composite	December
78465 - Molybdenum, Total In Sludge - mg/kg	75	1/Year	Composite	December

NOTES for Station Number _581:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 9
--------------------	--	----------	--------

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 582 - Stockpiled or Stored Sewage Sludge - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>		
Parameter	Daily Maximum	Measuring Frequency	Sampling Type	Monitoring Months
70316 - Sludge Weight - Dry Tons		1/Year	Total	December

NOTES for Station Number _582:

Monitoring is required when sewage sludge is stockpiled or stored. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

[NOTE: It is intended this station would be an annual reporting requirement regardless of the volume of dry tons of sewage sludge generated]

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 10
--------------------	--	----------	---------

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring -584 -EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Monthly Average	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		1/Year	Composite	December
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		1/Year	Composite	December
01003 - Arsenic, Total In Sludge - mg/kg	41	1/Year	Composite	December
01028 - Cadmium, Total In Sludge - mg/kg	39	1/Year	Composite	December
01043 - Copper, Total In Sludge - mg/kg	1,500	1/Year	Composite	December
01052 - Lead, Total In Sludge - mg/kg	300	1/Year	Composite	December
01068 - Nickel, Total In Sludge - mg/kg	420	1/Year	Composite	December
01093 - Zinc, Total In Sludge - mg/kg	2,800	1/Year	Composite	December
01148 - Selenium, Total In Sludge - mg/kg	100	1/Year	Composite	December
31641 - Fecal Coliform in Sludge - MPN/g	1,000	1/Year	Composite	December
51129 - Sludge Fee Weight - Dry Tons		1/Year	Total	December
70316 - Sludge Weight - Dry Tons		1/Year	Total	December
71921 - Mercury, Total In Sludge - mg/kg	17	1/Year	Composite	December
78465 - Molybdenum, Total In Sludge - mg/kg	75	1/Year	Composite	December

NOTES for Station Number _584:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 11
--------------------	--	----------	---------

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 585 - Sewage Sludge Incineration - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>		<u>Monitoring</u>
<u>Parameter</u>	<u>Maximum</u>	<u>Measuring Frequency</u>	<u>Sampling Type</u>	<u>Months</u>
01003 - Arsenic, Total In Sludge - mg/kg		1/Year	Total	December
01013 - Beryllium, Total In Sludge - mg/kg		1/Year	Total	December
01028 - Cadmium, Total In Sludge - mg/kg		1/Year	Total	December
01029 - Chromium, Total In Sludge - mg/kg		1/Year	Total	December
01052 - Lead, Total In Sludge - mg/kg		1/Year	Total	December
01068 - Nickel, Total In Sludge - mg/kg		1/Year	Total	December
51129 - Sludge Fee Weight - Dry Tons		1/Year	Total	December
71921 - Mercury, Total In Sludge - mg/kg		1/Year	Total	December

NOTES for Station Number _585:

Monitoring is required when sewage sludge is incinerated. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 12
--------------------	--	----------	---------

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 586 - Sewage Sludge Disposal in a Mixed Solid Waste Landfill - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>	
Parameter	Maximum	Measuring Frequency	Sampling Type
51129 - Sludge Fee Weight - Dry Tons		1/Year	Total
			December

NOTES for Station Number _586:

Monitoring is required when sewage sludge is removed from the Permittee's facility for disposal in a mixed solid waste landfill. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

[NOTE: It is intended this station would be an annual reporting requirement regardless of the volume of dry tons of sewage sludge generated]

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 13
--------------------	--	----------	---------

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 588 - Sewage Sludge Transferred to Another NPDES Permit Holder - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>	<u>Monitoring</u>
Parameter	Maximum	Measuring Frequency	Sampling Type
70316 - Sludge Weight - Dry/Tons		1/Year	Total
80991 - Sludge Volume - Gallons		1/Year	Total
			December
			December

NOTES for Station Number _588:

Monitoring is required when sewage sludge is removed from the Permittee's facility for transfer to another NPDES permit holder. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

[NOTE: It is intended this station would be an annual reporting requirement regardless of the volume of dry tons of sewage sludge generated]

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 14
--------------------	--	----------	---------

Example sewage sludge stations for < 70 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 589 - Other Sewage Sludge Use or Disposal - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>		
Parameter	Maximum	Measuring Frequency	Sampling Type	Monitoring Months
70316 - Sludge Weight - Dry Tons		1/Year	Total	December

NOTES for Station Number _589:

Monitoring is required when sewage sludge is removed from the Permittee's facility for use or disposal. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

[NOTE: It is intended this station would be an annual reporting requirement regardless of the volume of dry tons of sewage sludge generated]

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 15
--------------------	--	----------	---------

Example sewage sludge stations for ≥ 70 but < 320 dry tons sewage sludge per calendar year

[NOTE: See examples for < 70 dry tons for tables 582, 586, 588, and 589]

Table - Sewage Sludge Monitoring - 581 - Non-EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Maximum	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		2Y/year	Composite	Semi-annual
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		2Y/year	Composite	Semi-annual
01003 - Arsenic, Total In Sludge - mg/kg	75	2Y/year	Composite	Semi-annual
01028 - Cadmium, Total In Sludge - mg/kg	85	2Y/year	Composite	Semi-annual
01043 - Copper, Total In Sludge - mg/kg	4,300	2Y/year	Composite	Semi-annual
01052 - Lead, Total In Sludge - mg/kg	840	2Y/year	Composite	Semi-annual
01068 - Nickel, Total In Sludge - mg/kg	420	2Y/year	Composite	Semi-annual
01093 - Zinc, Total In Sludge - mg/kg	7,500	2Y/year	Composite	Semi-annual
01148 - Selenium, Total In Sludge - mg/kg	100	2Y/year	Composite	Semi-annual
51129 - Sludge Fee Weight - Dry Tons		2Y/year	Total	Semi-annual
70316 - Sludge Weight - Dry Tons		2Y/year	Total	Semi-annual
71921 - Mercury, Total In Sludge - mg/kg	57	2Y/year	Composite	Semi-annual
78465 - Molybdenum, Total In Sludge - mg/kg	75	2Y/year	Composite	Semi-annual

NOTES for Station Number _581:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted in June and December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 16
--------------------	--	----------	---------

Example sewage sludge stations for ≥ 70 but < 320 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring -584 - EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Monthly Average	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		2/Y year	Composite	Semi-annual
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		2/Y year	Composite	Semi-annual
01003 - Arsenic, Total In Sludge - mg/kg	41	2/Y year	Composite	Semi-annual
01028 - Cadmium, Total In Sludge - mg/kg	39	2/Y year	Composite	Semi-annual
01043 - Copper, Total In Sludge - mg/kg	1,500	2/Y year	Composite	Semi-annual
01052 - Lead, Total In Sludge - mg/kg	300	2/Y year	Composite	Semi-annual
01068 - Nickel, Total In Sludge - mg/kg	420	2/Y year	Composite	Semi-annual
01093 - Zinc, Total In Sludge - mg/kg	2,800	2/Y year	Composite	Semi-annual
01148 - Selenium, Total In Sludge - mg/kg	100	2/Y year	Composite	Semi-annual
31641 - Fecal Coliform in Sludge - MPN/g	1,000	2/Y year	Total	Semi-annual
51129 - Sludge Fee Weight - Dry Tons		2/Y year	Total	Semi-annual
70316 - Sludge Weight - Dry Tons		2/Y year	Total	Semi-annual
71921 - Mercury, Total In Sludge - mg/kg	17	2/Y year	Composite	Semi-annual
78465 - Molybdenum, Total In Sludge - mg/kg	75	2/Y year	Composite	Semi-annual

NOTES for Station Number _584:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted in June and December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 17
--------------------	--	----------	---------

Example sewage sludge stations for ≥ 70 but < 320 dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 585 - Sewage Sludge Incineration - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>		
Parameter	Maximum	Measuring Frequency	Sampling Type	Monitoring Months
01003 - Arsenic, Total In Sludge - mg/kg		2/Year	Total	Semi-annual
01013 - Beryllium, Total In Sludge - mg/kg		2/Year	Total	Semi-annual
01028 - Cadmium, Total In Sludge - mg/kg		2/Year	Total	Semi-annual
01029 - Chromium, Total In Sludge - mg/kg		2/Year	Total	Semi-annual
01052 - Lead, Total In Sludge - mg/kg		2/Year	Total	Semi-annual
01068 - Nickel, Total In Sludge - mg/kg		2/Year	Total	Semi-annual
51129 - Sludge Fee Weight - Dry Tons		2/Year	Total	Semi-annual
71921 - Mercury, Total In Sludge - mg/kg		2/Year	Total	Semi-annual

NOTES for Station Number _585:

Monitoring is required when sewage sludge is incinerated. Monthly Operating Report (MOR) data shall be submitted in June and December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 18
--------------------	--	----------	---------

Example sewage sludge stations for ≥ 320 but $< 1,650$ dry tons sewage sludge per calendar year

[NOTE: See examples for < 70 dry tons for tables 582, 586, 588, and 589]

Table - Sewage Sludge Monitoring - 581 - Non-EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Maximum	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		1/Quarter	Composite	Quarterly-Alt.
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		1/Quarter	Composite	Quarterly-Alt.
01003 - Arsenic, Total In Sludge - mg/kg	75	1/Quarter	Composite	Quarterly-Alt.
01028 - Cadmium, Total In Sludge - mg/kg	85	1/Quarter	Composite	Quarterly-Alt.
01043 - Copper, Total In Sludge - mg/kg	4,300	1/Quarter	Composite	Quarterly-Alt.
01052 - Lead, Total In Sludge - mg/kg	840	1/Quarter	Composite	Quarterly-Alt.
01068 - Nickel, Total In Sludge - mg/kg	420	1/Quarter	Composite	Quarterly-Alt.
01093 - Zinc, Total In Sludge - mg/kg	7,500	1/Quarter	Composite	Quarterly-Alt.
01148 - Selenium, Total In Sludge - mg/kg	100	1/Quarter	Total	Quarterly-Alt.
51129 - Sludge Fee Weight - Dry Tons		1/Quarter	Total	Quarterly-Alt.
70316 - Sludge Weight - Dry Tons	57	1/Quarter	Composite	Quarterly-Alt.
71921 - Mercury, Total In Sludge - mg/kg	75	1/Quarter	Composite	Quarterly-Alt.
78465 - Molybdenum, Total In Sludge - mg/kg		1/Quarter	Composite	Quarterly-Alt.

NOTES for Station Number _581:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted in March, June, August, and December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 19
--------------------	--	----------	---------

Example sewage sludge stations for ≥ 320 but $< 1,650$ dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring -584 - EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Monthly Average	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		1/Quarter	Composite	Quarterly-Alt.
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		1/Quarter	Composite	Quarterly-Alt.
01003 - Arsenic, Total In Sludge - mg/kg	41	1/Quarter	Composite	Quarterly-Alt.
01028 - Cadmium, Total In Sludge - mg/kg	39	1/Quarter	Composite	Quarterly-Alt.
01043 - Copper, Total In Sludge - mg/kg	1,500	1/Quarter	Composite	Quarterly-Alt.
01052 - Lead, Total In Sludge - mg/kg	300	1/Quarter	Composite	Quarterly-Alt.
01068 - Nickel, Total In Sludge - mg/kg	420	1/Quarter	Composite	Quarterly-Alt.
01093 - Zinc, Total In Sludge - mg/kg	2,800	1/Quarter	Composite	Quarterly-Alt.
01148 - Selenium, Total In Sludge - mg/kg	100	1/Quarter	Composite	Quarterly-Alt.
51129 - Sludge Fee Weight - Dry Tons		1/Quarter	Total	Quarterly-Alt.
70316 - Sludge Weight - Dry Tons	17	1/Quarter	Total	Quarterly-Alt.
71921 - Mercury, Total In Sludge - mg/kg		1/Quarter	Composite	Quarterly-Alt.
78465 - Molybdenum, Total In Sludge - mg/kg	75	1/Quarter	Composite	Quarterly-Alt.

NOTES for Station Number _584:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted in March, June, August, and December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 20
--------------------	--	----------	---------

Example sewage sludge stations for ≥ 320 but $< 1,650$ dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 585 - Sewage Sludge Incineration - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>	<u>Monitoring</u>
Parameter	Maximum	Measuring Frequency	Sampling Type
01003 - Arsenic, Total In Sludge - mg/kg		1/Quarter	Total
01013 - Beryllium, Total In Sludge - mg/kg		1/Quarter	Total
01028 - Cadmium, Total In Sludge - mg/kg		1/Quarter	Total
01029 - Chromium, Total In Sludge - mg/kg		1/Quarter	Total
01052 - Lead, Total In Sludge - mg/kg		1/Quarter	Total
01068 - Nickel, Total In Sludge - mg/kg		1/Quarter	Total
51129 - Sludge Fee Weight - Dry Tons		1/Quarter	Total
71921 - Mercury, Total In Sludge - mg/kg		1/Quarter	Total

NOTES for Station Number _585:

Monitoring is required when sewage sludge is incinerated. Monthly Operating Report (MOR) data shall be submitted in March, June, August, and December. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 21
--------------------	--	----------	---------

Example sewage sludge stations for $\geq 1,650$ but $< 16,500$ dry tons sewage sludge per calendar year

[NOTE: See examples for < 70 dry tons for tables 582, 586, 588, and 589]

Table - Sewage Sludge Monitoring - 581 - Non-EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Maximum	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		1/Month	Composite	All
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		1/Month	Composite	All
01003 - Arsenic, Total In Sludge - mg/kg	75	1/Month	Composite	All
01028 - Cadmium, Total In Sludge - mg/kg	85	1/Month	Composite	All
01043 - Copper, Total In Sludge - mg/kg	4,300	1/Month	Composite	All
01052 - Lead, Total In Sludge - mg/kg	840	1/Month	Composite	All
01068 - Nickel, Total In Sludge - mg/kg	420	1/Month	Composite	All
01093 - Zinc, Total In Sludge - mg/kg	7,500	1/Month	Composite	All
01148 - Selenium, Total In Sludge - mg/kg	100	1/Month	Composite	All
51129 - Sludge Fee Weight - Dry Tons		1/Month	Total	All
70316 - Sludge Weight - Dry Tons		1/Month	Total	All
71921 - Mercury, Total In Sludge - mg/kg	57	1/Month	Composite	All
78465 - Molybdenum, Total In Sludge - mg/kg	75	1/Month	Composite	All

NOTES for Station Number _581:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted each month. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 22
--------------------	--	----------	---------

Example sewage sludge stations for $\geq 1,650$ but $< 16,500$ dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring -584 - EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Monthly Average	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
00611 - Nitrogen Ammonia, Total In sludge - mg/kg		1/Month	Composite	All
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		1/Month	Composite	All
01003 - Arsenic, Total In Sludge - mg/kg	41	1/Month	Composite	All
01028 - Cadmium, Total In Sludge - mg/kg	39	1/Month	Composite	All
01043 - Copper, Total In Sludge - mg/kg	1,500	1/Month	Composite	All
01052 - Lead, Total In Sludge - mg/kg	300	1/Month	Composite	All
01068 - Nickel, Total In Sludge - mg/kg	420	1/Month	Composite	All
01093 - Zinc, Total In Sludge - mg/kg	2,800	1/Month	Composite	All
01148 - Selenium, Total In Sludge - mg/kg	100	1/Month	Composite	All
51129 - Sludge Fee Weight - Dry Tons		1/Month	Total	All
70316 - Sludge Weight - Dry Tons		1/Month	Total	All
71921 - Mercury, Total In Sludge - mg/kg	17	1/Month	Composite	All
78465 - Molybdenum, Total In Sludge - mg/kg	75	1/Month	Composite	All

NOTES for Station Number _584:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted each month. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 23
--------------------	--	----------	---------

Example sewage sludge stations for $\geq 1,650$ but $< 16,500$ dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 585 - Sewage Sludge Incineration - Final

Effluent Characteristic Parameter	Discharge Limitations Maximum	Monitoring Requirements		
		Measuring Frequency	Sampling Type	Monitoring Months
01003 - Arsenic, Total In Sludge - mg/kg		1/Month	Total	All
01013 - Beryllium, Total In Sludge - mg/kg		1/Month	Total	All
01028 - Cadmium, Total In Sludge - mg/kg		1/Month	Total	All
01029 - Chromium, Total In Sludge - mg/kg		1/Month	Total	All
01052 - Lead, Total In Sludge - mg/kg		1/Month	Total	All
01068 - Nickel, Total In Sludge - mg/kg		1/Month	Total	All
51129 - Sludge Fee Weight - Dry Tons		1/Month	Total	All
71921 - Mercury, Total In Sludge - mg/kg		1/Month	Total	All

NOTES for Station Number _585:

Monitoring is required when sewage sludge is incinerated. Monthly Operating Report (MOR) data shall be submitted each month. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 24
--------------------	--	----------	---------

Example sewage sludge stations for \geq 16,500 dry tons sewage sludge per calendar year

[NOTE: See examples for < 70 dry tons for tables 582, 586, 588, and 589]

Table - Sewage Sludge Monitoring - 581 - Non-EQ Sewage Sludge Land Application - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>	<u>Monitoring</u>
<u>Parameter</u>	<u>Maximum</u>	<u>Measuring Frequency</u>	<u>Sampling Type</u>
00611 - Nitrogen Ammonia, Total In Sludge - mg/kg		2/Month	Composite
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		2/Month	Composite
01003 - Arsenic, Total In Sludge - mg/kg	75	2/Month	Composite
01028 - Cadmium, Total In Sludge - mg/kg	85	2/Month	Composite
01043 - Copper, Total In Sludge - mg/kg	4,300	2/Month	Composite
01052 - Lead, Total In Sludge - mg/kg	840	2/Month	Composite
01068 - Nickel, Total In Sludge - mg/kg	420	2/Month	Composite
01093 - Zinc, Total In Sludge - mg/kg	7,500	2/Month	Composite
01148 - Selenium, Total In Sludge - mg/kg	100	2/Month	Composite
51129 - Sludge Fee Weight - Dry Tons		2/Month	Total
70316 - Sludge Weight - Dry Tons		2/Month	Total
71921 - Mercury, Total In Sludge - mg/kg	57	2/Month	Composite
78465 - Molybdenum, Total In Sludge - mg/kg	75	2/Month	Composite

NOTES for Station Number 581:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted each month. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 25
--------------------	--	----------	---------

Example sewage sludge stations for $\geq 16,500$ dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring -584 - EQ Sewage Sludge Land Application - Final

Effluent Characteristic Parameter	Discharge Limitations Monthly Average	Monitoring Requirements		Monitoring Months
		Measuring Frequency	Sampling Type	
00611 - Nitrogen Ammonia, Total In sludge - mg/kg		2/Month	Composite	Bimonthly-Even
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg		2/Month	Composite	Bimonthly-Even
01003 - Arsenic, Total In Sludge - mg/kg	41	2/Month	Composite	Bimonthly-Even
01028 - Cadmium, Total In Sludge - mg/kg	39	2/Month	Composite	Bimonthly-Even
01043 - Copper, Total In Sludge - mg/kg	1,500	2/Month	Composite	Bimonthly-Even
01052 - Lead, Total In Sludge - mg/kg	300	2/Month	Composite	Bimonthly-Even
01068 - Nickel, Total In Sludge - mg/kg	420	2/Month	Composite	Bimonthly-Even
01093 - Zinc, Total In Sludge - mg/kg	2,800	2/Month	Composite	Bimonthly-Even
01148 - Selenium, Total In Sludge - mg/kg	100	2/Month	Total	Bimonthly-Even
51129 - Sludge Fee Weight - Dry Tons		2/Month	Total	Bimonthly-Even
70316 - Sludge Weight - Dry Tons	17	2/Month	Total	Bimonthly-Even
71921 - Mercury, Total In Sludge - mg/kg	75	2/Month	Composite	Bimonthly-Even
78465 - Molybdenum, Total In Sludge - mg/kg		2/Month	Composite	Bimonthly-Even

NOTES for Station Number _584:

Monitoring is required when sewage sludge is removed from the Permittee's facility for application to the land. Monthly Operating Report (MOR) data shall be submitted each month. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

Permit Guidance 11	NPDES Monitoring and Reporting - Sewage Sludge	04/15/05	Page 26
--------------------	--	----------	---------

Example sewage sludge stations for $\geq 16,500$ dry tons sewage sludge per calendar year

Table - Sewage Sludge Monitoring - 585 - Sewage Sludge Incineration - Final

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>	<u>Monitoring</u>
Parameter	Maximum	Measuring Frequency	Sampling Type
01003 - Arsenic, Total In Sludge - mg/kg		2/Month	Total
01013 - Beryllium, Total In Sludge - mg/kg		2/Month	Total
01028 - Cadmium, Total In Sludge - mg/kg		2/Month	Total
01029 - Chromium, Total In Sludge - mg/kg		2/Month	Total
01052 - Lead, Total In Sludge - mg/kg		2/Month	Total
01068 - Nickel, Total In Sludge - mg/kg		2/Month	Total
51129 - Sludge Fee Weight - Dry Tons		2/Month	Total
71921 - Mercury, Total In Sludge - mg/kg		2/Month	Total

NOTES for Station Number _585:

Monitoring is required when sewage sludge is incinerated. Monthly Operating Report (MOR) data shall be submitted each month. If no sewage sludge is removed from the Permittee's facility during the reporting period, report "AL" in the first column of the first day of the 4500 Form. A signature is still required.

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

NPDES Yr/Mo/Day Inspection Type Inspector Fac Type

S

1

Permit #

C

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1PK00002*FD	OH0036641	97/09/29	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Indian Lake Water Pollution Control District 1015 Orchard Island Road South Russells Point, OH 43348	1:00 p.m.	October 1, 1996
	Exit Time	Permit Expiration Date
	3:30 p.m.	March 31, 2001

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Thomas Weer Assist. Mgr./Operations	(937) 843-3328

Name, Address and Title of Responsible Official	Phone Number
Garis Pugh, District Manager Indian Lake Water Pollution Control District 1015 Orchard Island road South Russells Point, OH. 43348	(937) 843-3328

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Compliance Schedules
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Collection System		

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

SEE ATTACHED REPORT.



Aaron M. Shultz	<i>Aaron M. Shultz</i>	10/17/97	Ohio EPA, SWDO
Name(s) and Signature(s) of Inspector(s)		Date	District Office

Martyn G. Burt	<i>Martyn G. Burt</i>	10/21/97	Ohio EPA, SWDO
Name and Signature of Reviewer		Date	District Office