

NPDES Compliance Inspection Manual

Appendix P



EPA Publication Number: 305-K-17-001
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Appendix P – Sludge Inspection Checklists

Sludge Inspection Checklist

Yes	No	N/A	1. Are 40 CFR Part 503 sludge use and disposal requirements contained in a current NPDES permit, in a separate "sludge only" NPDES permit, in a RCRA Subtitle C permit, or in a CAA permit? [503.3(a)(1) or (2) (1)]
Yes	No	N/A	2. Sludge use and disposal practice(s): a. Land Application ____ [503.10] Bulk Sewage Sludge ____ [503.11(e)] Bulk Material Derived from Sewage Sludge ____ [503.11(e)] Or Sold or Given Away in a Bag or Another Container ____ [503.11(e)] b. Surface Disposal ____ [503.20] c. Sewage Sludge Incineration ____ [503.40] d. Onsite or Offsite Storage ____ [503.9(y)] Date storage began ____ ended ____ (Maximum time allowed: 2 years from February 19, 1993) e. Other (list) _____
Yes	No	N/A	3. Each sludge use or disposal practice is permitted? [503.3(a)(1) (1)]
Yes	No	N/A	4. Notification is given to EPA/State of new or different sludge disposal method? (Permit)
Yes	No	N/A	5. Number and location of disposal sites/activities are as described in the permit or fact sheet or land application plan (40 CFR Part 501)? [Permit]
Comments:			
Yes	No	N/A	1. Self-monitoring data are available for all regulated pollutants? [503.17], [503.27], [503.43]
Yes	No	N/A	2. Pathogen and vector attraction reduction method description and certification statement(s) available? [503.17], [503.27]
Yes	No	N/A	3. Records are available for each applicable use or disposal practice? [503.17], [503.27], [503.47]
Yes	No	N/A	4. Accurate records of sludge volume or mass are maintained, where appropriate? [503.25], [503.47]
Yes	No	N/A	5. Monitoring and analyses are performed more often than required by permit? If so, results are reported in the permittee's self-monitoring report? [Permit]
Yes	No	N/A	6. Unit operations records verify compliance with pathogen and vector attraction reduction requirements, where appropriate? [503.15], [503.25]
Yes	No	N/A	7. Self-monitoring is conducted at the frequency specified in the permit, in 503.16 Table 1 (land application), or in 503.26 Table 1 (surface disposal)? [503.16],

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			[503.26] or [503.46] Table 1. Production-dependent – 0-289 mtpy: 1/yr., 290-1499 mtpy: 1/qtr., 1500-14999 mtpy: ½ mo., 15000 mtpy and greater, 1/mo.) mtpy-metric ton per year
Yes	No	N/A	8. Facility reports sludge monitoring data at the frequency specified in the permit? (Only for Class I facilities or POTWs with either total design flow >1 mgd or serving population >10,000) [503.18], [503.28], [503.48]
Yes	No	N/A	9. Sludge records are maintained for at least 5 years? [503.17], [503.27], [503.47]
Yes	No	N/A	10. Sludge data are reported on Discharge Monitoring Report (DMR) or approved form? [Permit]
Yes	No	N/A	11. Sludge records are adequate to assess compliance with annual and/or cumulative pollutant loading rates or other established permit limits? [503.13(a) (2) (i), 503.13(a) (4) (ii)]
Comments:			
Yes	No	N/A	1. Sludge samples are taken at locations specified in the permit? [Permit]
Yes	No	N/A	2. Sludge sample locations are appropriate for obtaining representative samples? [503.8(a)]
Yes	No	N/A	3. Sampling and analysis are conducted for parameters specified in the permit or in 40 CFR Part 503? [Permit], [503.13], [503.23], [503.46]
Yes	No	N/A	4. Sample collection procedures:
Yes	No	N/A	a. Adequate sample volumes are obtained?
Yes	No	N/A	b. Proper preservation techniques are used?
Yes	No	N/A	c. Containers conform to appropriate analytical method specified in 40 CFR Part 503.8?
Yes	No	N/A	d. Samples analyzed in the appropriate time frames in accordance with 40 CFR Part 503.8?
Yes	No	N/A	5. Are results reported on a dry weight basis? [503.13], [503.23], [503.43] (Dry weight concentration = Wet weight concentration/Decimal fraction of solids) e.g., A sludge containing 20 mg/l Cu and having 5% solids. Dry weight Cu (mg/kg) = $\frac{20 \text{ mg/l}}{0.05} = 400 \text{ mg/kg}$
Yes	No	N/A	6. Sample is refrigerated subsequent to compositing?
Yes	No	N/A	7. Chain-of-custody procedures are employed?
Yes	No	N/A	8. Analytical methods used are approved methods in 40 CFR Part 503.8 or updated methods specified for Part 503 compliance?

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Comments:			
Yes	No	N/A	1. Sludge process control parameters maintained as appropriate?
Yes	No	N/A	2. Adequate equipment redundancy (e.g., back-up units)?
Yes	No	N/A	3. Adequate sludge storage capacity?
Yes	No	N/A	4. Contingency plan for sludge disposal practice?
Yes	No	N/A	5. Solids handling operation adequate to manage volume of sludge?
Comments:			
Yes	No	N/A	1. Is primary unstabilized sludge fed to the thickener, centrifuge or drying bed? If yes, list percentage of unstabilized sludge _____
Yes	No	N/A	2. What is the average % solids of the sludge before thickening, drying or centrifuging? _____ % after? _____ %
Yes	No	N/A	3. Is sludge mixed with other materials before or after thickening?
Yes	No	N/A	4. For sludge containing unstabilized solids, is the percent solids greater than 90% prior to mixing with other materials?
Yes	No	N/A	5. For sludge containing no unstabilized solids, is the percent solids greater than 75% prior to mixing with other materials?
Comments:			
		1. Sludge fed to digester(s) includes: ___ Primary ___ Secondary ___ Combined	
		2. Digester(s) operating mode: ___ high rate ___ low rate	
Yes	No	N/A	3. Digester(s) are operated at proper temperature [mesophilic: 95°F (35°C) and thermophilic: 131°F (55°C)?
		List operating mode: ___ mesophilic ___ thermophilic	
Yes	No	N/A	4. Temperature monitoring location and frequency sufficient to demonstrate compliance with Class B pathogen reduction requirements for PSRP?
		Average Temperature: _____ °C or °F	

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Yes	No	N/A	5. Solids Retention Time (SRT) or Mean Cell Residence time (MCRT) calculated properly? *
Yes	No	N/A	6. SRT or MCRT sufficient to demonstrate compliance with Class B pathogen reduction requirements for PSRP? Average SRT or MCRT: ____ days *For batch operated digesters with no recycle: SRT or MCRT = Mass of solids in digester, kg Solids removed, kg/day This formula can be used to estimate SRT or MCRT for all digester systems. For calculating SRT or MCRT for other system configurations, use the WEF Manual of Practice or other references. Always write down the calculation used by the facility no matter what the configuration is.
Comments:			
			1. Sludge fed to digester(s) includes: ____ Primary ____ Secondary ____ Combined
			2. Digester(s) operating mode: ____ high rate ____ low rate
Yes	No	N/A	3. Digester(s) are operated at proper temperature [cryophilic: <50°F (<10°C), mesophilic: 50-108°F (10-42°C), and thermophilic: >108°F (42°C)]? List operating mode: ____ cryophilic ____ mesophilic ____ thermophilic
Yes	No	N/A	4. Temperature monitoring location and frequency sufficient to demonstrate compliance with Class B pathogen reduction requirements for PSRP or with Class A pathogen reduction requirements for PFRP (Thermophilic aerobic digestion only)? Average Temperature: ____°C or °F
Yes	No	N/A	5. Solids Retention Time (SRT) or Mean Cell Residence time (MCRT) calculated properly? *
Yes	No	N/A	6. SRT or MCRT sufficient to demonstrate compliance with Class B pathogen reduction requirements for PSRP or with Class A pathogen reduction requirements for PFRP (Thermophilic digestion only)? Average SRT or MCRT: ____ days
Yes	No	N/A	7. Aerobic conditions verified through dissolved oxygen monitoring? *For batch operated digesters with no recycle: SRT or MCRT = Mass of solids in digester, kg Solids removed, kg/day This formula can be used to estimate SRT or MCRT for all digester systems. For calculating SRT or MCRT for other system configurations, use the WEF Manual of

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	Practice or other references. Always write down the calculation used by the facility no matter what the configuration is.	
Comments:		
	1. Type of composting performed: ___ In vessel ___ Static piles ___ Windrows	
	2. Type of sludge composted: ___ Primary ___ Secondary ___ Combined	
Yes No N/A	3. Is the moisture content monitored?	
Yes No N/A	4. Is compost mixed? Method? _____ Frequency of turnings? _____	
Yes No N/A	5. Is oxygen content monitored?	
Yes No N/A	6. Is temperature monitored?	
Yes No N/A	7. Are total and total volatile solids monitored?	
	8. Active phase ___ days Curing phase ___ days	
Yes No N/A	9. Is site runoff treated? Where? _____	
Yes No N/A	10. Temperature monitoring location and frequency sufficient to demonstrate compliance with Class B pathogen reduction requirements for PSRP or with Class A pathogen reduction requirements for PFRP?	
Yes No N/A	11. Temperature and/or oxygen monitoring sufficient to determine compliance with vector attraction reduction requirements?	
Comments:		
Yes No N/A	1. Sewage sludge or material derived from sewage sludge is land applied to:	
	Agricultural Land _____ Forest _____ Reclamation Site _____ Lawn or Home Garden _____ Public Contact Site (Park, etc.) _____	
Yes No N/A	2. Do monitoring results show pollutant concentrations below values shown in Table 1 in 40 CFR Part 503.13(b)(1)? [Part 503.13(a)(1)] ⁽²⁾	
Yes No N/A	3. Do monitoring results show pollutant concentrations below values shown in 40 CFR Part 503.13(b)(3)? ⁽³⁾	
	4. Classifications of Sewage Sludge with respect to Pathogens: [503.30] ⁽⁴⁾ Class A _____ Class B _____ Unknown _____	
Yes No N/A	5. Are Class A Pathogen reduction requirements met? [503.15(a)] ⁽⁴⁾	

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			<p>6. Indicate which method is used to meet Class A requirements: [503.32(a)]</p> <p><input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and Time/Temperature requirements. [503.32(a)(3)]</p> <p><input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and pH requirements. [503.32(a)(4)]</p> <p><input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and enteric viruses or helminth ova reduction requirements. [503.32(a)(5)]</p> <p><input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and enteric viruses or helminth ova density requirements. [503.32(a)(6)]</p> <p><input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and Process to Further Reduce Pathogens (PFRP). [503.32(a)(7) and [503 Appendix B] (5)]</p> <p><input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and equivalent PFRP. [503.32(a)(8) and [503 Appendix B] (5)]</p>
Yes	No	N/A	7. Are Class B Pathogen reduction requirements met? [503.32(b) (4)]
			<p>8. Indicate which method(s) is used to meet Class B requirements:</p> <p><input type="checkbox"/> Geometric mean of seven Fecal Coliform samples with <2,000,000 MPN/g total solids or <2,000,000 Colony Forming Units/g total solids. [503.32(b)(2)]</p> <p><input type="checkbox"/> Treated by Process to Significantly Reduce Pathogens (PSRP). [503.32(b)(3) and [503 Appendix B] (5)]</p> <p><input type="checkbox"/> Treated by equivalent PSRP. [503.32(b)(4) and [503 Appendix B] (5)]</p>
Yes	No	N/A	9. For Class B sludge which is land applied, are Site Restrictions practiced? [503.32 (b)(5) (4)]
Yes	No	N/A	<p>10. Indicate Site Restrictions practiced where applicable:</p> <p><input type="checkbox"/> Food crops (above ground) are harvested >14 months after application of sewage sludge? [503.32(b)(5)(i)]</p> <p><input type="checkbox"/> Food Crops (below ground) are harvested >20 months after application of sewage sludge when sludge stays on land for >4 months prior to incorporation into soil? [503.32(b)(5)(ii)]</p> <p><input type="checkbox"/> Food Crops (below ground) are harvested >38 months after application of sewage sludge when sludge stays on land for <4 months prior to incorporation into soil? [503.32(b)(5)(iii)]</p> <p><input type="checkbox"/> Food Crops, feed crops, and fiber crops are harvested >30 days after application of sewage sludge? [503.32(b)(5)(iv)]</p> <p><input type="checkbox"/> Animal grazing allowed on land only >30 days after application of sewage sludge? [503.32(b)(5)(v)]</p> <p><input type="checkbox"/> Turf grown on land where sewage sludge was applied placed on high public expose land or lawn is harvested >1 year after application of sewage sludge? [503.32(b)(5)(vi)]</p> <p><input type="checkbox"/> Public access is restricted to land with a potential for high public exposure for 1 year? [503.32(b)(5)(vii)]</p>

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			<input type="checkbox"/> Public access is restricted to land with a potential for low public exposure for 30 days? [503.32(b)(5)(viii)]
Yes	No	N/A	11. Is a Vector Attraction Reduction method practiced? [503.15(c) (6)]
Yes	No	N/A	12. Indicate Vector Attraction Reduction method: [503.33(b)]
			<input type="checkbox"/> 38% Volatile Solids Reduction. [503.33(b)(1) (7)]
			<input type="checkbox"/> 40-day test - Volatile Solids reduced <17%. [503.33(b)(2) (Anaerobic Digestion Only)]
			<input type="checkbox"/> 30-day test - Volatile Solids reduced <15%. [503.33(b)(3) (Aerobic Digestion Only)]
			<input type="checkbox"/> Specific Oxygen Uptake Rate (SOUR) <1.5 mg/hr./gm TS @ 20°C. [503.33(b)(4)]
			<input type="checkbox"/> Aerobic Process for >14 days @ >40°C with average sludge temperatures >45°C. [503.33(b)(5)]
			<input type="checkbox"/> pH >12 for 2 hours and pH >11.5 for 22 hours [503.33(b)(6)]
			<input type="checkbox"/> Sludge (with no unstabilized solids) contains >75% Total Solids prior to mixing with other materials. [503.33(b)(7)]
			<input type="checkbox"/> Sludge (contains unstabilized solids) contains >90% Total Solids prior to mixing with other materials. [503.33(b)(8)]
			<input type="checkbox"/> Subsurface Injection. [503.33(b)(9)]
			<input type="checkbox"/> Soil Incorporation. [503.33(b)(10)]
Yes	No	N/A	13. Are general requirements (503.12) and management practices (503.14) applied for sludge not meeting Table 3 pollutant concentrations, Class pathogen reduction requirements, and vector attraction reduction methods? [503.10], [503.12], [503.14]
Yes	No	N/A	14. Indicate management practices where applicable: <input type="checkbox"/> No threatened or endangered species present or critical habitat affected at the location(s) where bulk sludge is applied. <input type="checkbox"/> Bulk sludge not applied to frozen or snow covered ground. <input type="checkbox"/> Bulk sludge applied >10 meters from waters of the U.S. <input type="checkbox"/> Bulk sludge applied at a rate equal to or less than agronomic rate. <input type="checkbox"/> Label affixed on bag or information sheet provided to user of sold and given away sludge indicating name of sludge preparer, application instructions, and maximum annual whole sludge application rate.
Yes	No	N/A	15. Indicate general requirements practiced where applicable: <input type="checkbox"/> Sludge is not applied to a site where the cumulative pollutant loading or annual application rate has been reached. <input type="checkbox"/> Notification given to the sludge applier regarding total nitrogen content of the sludge. <input type="checkbox"/> Sufficient information required to comply with 40 CFR Part 503 is given to preparers/appliers/land owners.

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	___	Written notification given to permitting authority (including States) regarding the location of land application sites, appropriate NPDES permit numbers.																																							
Yes	No	N/A	16. Description of how management practices are met for each land application site available?																																						
Comments:																																									
<p>Land Application Footnotes:</p> <p>(1) Permits are not required. Part 503 is self-implementing. Part 503 does not cover industrial sludges or grit and screenings.</p> <p>(2) 503.13(b)(1), Table 1 values must be met to land apply sludge:</p> <p style="padding-left: 40px;">Table 1 (mg/kg):</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Arsenic</td> <td style="width: 15%;">75</td> <td style="width: 20%;">Lead</td> <td style="width: 15%;">840</td> <td style="width: 20%;">Nickel</td> <td style="width: 10%;">420</td> </tr> <tr> <td>Cadmium</td> <td>85</td> <td>Mercury</td> <td>5757</td> <td>Selenium</td> <td>100</td> </tr> <tr> <td>Copper</td> <td>4300</td> <td>Molybdenum</td> <td>75</td> <td>Zinc</td> <td>7500</td> </tr> </table> <p>(3) 503.13(b)(3), Table 3 must be met for any sludge applied to a lawn or home garden. For bulk sludge, Table 3 must be met or the sludge is subject to cumulative loading limits in 503.13(b)(2). For sewage sludge sold and given away in a bag or other container, Table 3 must also be met or the sludge is subject to annual pollutant loadings in 503.13(b)(4). This also signals that additional recordkeeping requirements of 503.12 and 503.17 apply.</p> <p style="padding-left: 40px;">Table 2 (mg/kg):</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Arsenic</td> <td style="width: 15%;">41</td> <td style="width: 20%;">Lead</td> <td style="width: 15%;">300</td> <td style="width: 20%;">Selenium</td> <td style="width: 10%;">100</td> </tr> <tr> <td>Cadmium</td> <td>39396</td> <td>Mercury</td> <td>17</td> <td>Zinc</td> <td>2800</td> </tr> <tr> <td>Copper</td> <td>1500</td> <td>Nickel</td> <td>420</td> <td></td> <td></td> </tr> </table> <p>(4) Class A requirements must be met when bulk sludge is land applied to a lawn or home garden, or when sewage sludge is sold or given away in a bag or another container. Also, Class A requirements or Class B requirements combined with appropriate site restrictions must be met for when bulk or bulk material derived from sludge is applied to agricultural land, reclamation site, forest, or public contact site.</p> <p>(5) Process to Significantly Reduce Pathogens (PSRP) includes Aerobic Digestion, Air Drying, Anaerobic Digestion, Composting, and Lime Stabilization. Process to Further Reduce Pathogens (PFRP) includes Composting, Heat Drying, Heat Treatment, Thermophilic Aerobic Digestion, Beta Ray Irradiation, Gamma Ray Irradiation, and Pasteurization. Each process has required operating conditions to demonstrate compliance. See 503 Appendix B and Unit Process Checklists.</p> <p>(6) One of the methods 503.33(b)(1)-(10) must be used when land applying bulk sewage sludge to agricultural land, forest, a public contact site, or a reclamation site. One of the methods 503.33(b)(1)-(8) must be met when land applying bulk sludge to a lawn or home garden, or when sewage sludge or derived material is sold or given away in a bag or another container.</p> <p>(7) Volatile solids reduction through the sludge treatment train [only] is generally calculated using the Van Kleeck equation. following general formula:</p> <p style="padding-left: 40px;">% VS Reduction = (Mass of solids in, kg X Mass of solids out, kg) x 100 Mass of solids in, kg</p>						Arsenic	75	Lead	840	Nickel	420	Cadmium	85	Mercury	5757	Selenium	100	Copper	4300	Molybdenum	75	Zinc	7500	Arsenic	41	Lead	300	Selenium	100	Cadmium	39396	Mercury	17	Zinc	2800	Copper	1500	Nickel	420		
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Cadmium	85	Mercury	5757	Selenium	100																																				
Copper	4300	Molybdenum	75	Zinc	7500																																				
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Cadmium	39396	Mercury	17	Zinc	2800																																				
Copper	1500	Nickel	420																																						

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<p>Other Variations of this formula are presented in the document Environmental Regulations and Technology-Control of Pathogens and Vector Attraction in Sewage Sludge, EPA-625/R-92/013. See document for specific calculations. Website: http://www.epa.gov/ORD/NRMRL/Pubs/1992/625R92013.html.</p>			
Yes	No	N/A	1. Does each Surface Disposal Unit (SDU) have a liner and leachate collection system?
			2. Smallest distance from active SDU boundary to property boundary is _____ ft.
Yes	No	N/A	3. For an active SDU (property boundary is greater than 150 meters from SDU) and without a liner or leachate collection system, do monitoring results show pollutant concentrations below values shown in 40 CFR Part 503.23(a)(1) Table 1? [503.23(a)(1) ⁽¹⁾
Yes	No	N/A	4. For an active SDU without a liner and leachate collection system (property boundary is less than 150 meters from SDU), do monitoring results show pollutant concentrations below values shown in 40 CFR Part 503.23(a)(2) Table 2? [503.23(a)(1) ⁽²⁾
Yes	No	N/A	5. Are management practices employed? [503.24]
Yes	No	N/A	<p>6. List management practices where applicable:</p> <p><input type="checkbox"/> No threatened or endangered species present or critical habitat affected at the location where bulk sludge is surface disposed.</p> <p><input type="checkbox"/> Surface disposal unit shall not restrict flow of base flood.</p> <p><input type="checkbox"/> If in seismic impact zone, design will withstand recorded horizontal ground acceleration.</p> <p><input type="checkbox"/> Located > 60 meters from any fault displaced in Holocene time.</p> <p><input type="checkbox"/> Not located in unstable area or wetlands.</p> <p><input type="checkbox"/> Runoff collection and treatment with 25-year, 24-hour storm runoff event storage capacity.</p> <p><input type="checkbox"/> Leachate collection system operated and maintained for 3 years after closure of the surface disposal unit.</p> <p><input type="checkbox"/> Leachate treated and disposed of in accordance with applicable requirements, i.e., NPDES permit.</p> <p><input type="checkbox"/> Methane is contained under covered units at a concentration less than 25% of the LEL for methane.</p> <p><input type="checkbox"/> Methane is contained under a final cover placed on a closed unit maintained at a concentration less than 25% of the LEL for methane for three years after closure.</p> <p><input type="checkbox"/> Methane concentration at the property line is maintained at a concentration less than the LEL for methane for three years after closure of the unit.</p> <p><input type="checkbox"/> No feed or food crops grown on active unit.⁽³⁾</p> <p><input type="checkbox"/> No animal grazing allowed on active unit.⁽³⁾</p> <p><input type="checkbox"/> Public access restricted for the period of time while a unit is active and for three years after last active unit in a site closes.</p>

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			<input type="checkbox"/> Sludge placed in an active unit does not contaminate groundwater aquifers. ⁽⁴⁾
Yes	No	N/A	7. Classification of Sewage Sludge with respect to Pathogens: [503.30] Class A _____ Class B _____ Unknown _____
Yes	No	N/A	8. Are Class A Pathogen reductions requirements met? [503.15(a)] ⁽⁵⁾
			9. Indicate which method is used to meet Class A requirements: [503.32(a)] <input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and Time/Temperature requirements. [503.32(a)(3)] <input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and pH requirements. [503.32(a)(4)] <input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and enteric viruses or helminth ova reduction requirements. [503.32(a)(5)] <input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and enteric viruses or helminth ova density requirements. [503.32(a)(6)] <input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and Process to Further Reduce Pathogens (PFRP). [503.32(a)(7) and [503 Appendix B] <input type="checkbox"/> Fecal Coliform <1000 MPN/g total solids, or <i>Salmonella</i> <3 MPN/4 g total solids, and equivalent PFRP. [503.32(a)(8) and [503 Appendix B]] ⁽⁷⁾
Yes	No	N/A	10. Are Class B Pathogen reduction requirements met? [503.32(b)] (5)
			11. Indicate which method(s) is used to meet Class B requirements: <input type="checkbox"/> Geometric mean of seven Fecal Coliform samples with <2,000,000 MPN/g total solids or <2,000,000 Colony Forming Units/g total solids. [503.32(b)(2)] <input type="checkbox"/> Treated by Process to Significantly Reduce Pathogens (PSRP). [503.32(b)(3) and [503 Appendix B]] ⁽⁶⁾ <input type="checkbox"/> Treated by equivalent PSRP. [503.32(b)(4) and [503 Appendix B]] ⁽⁶⁾
Yes	No	N/A	12. Is a Vector Attraction Reduction method practiced? [503.25(b)] ⁽⁷⁾
Yes	No	N/A	13. Indicate Vector Attraction Reduction method: [503.33(b)] <input type="checkbox"/> 38% Volatile Solids Reduction. [503.33(b)(1)] <input type="checkbox"/> 40-day test - Volatile Solids reduced <17%. [503.33(b)(2) (Anaerobic Digestion Only)] <input type="checkbox"/> 30-day test - Volatile Solids reduced <15%. [503.33(b)(3) (Aerobic Digestion Only)] <input type="checkbox"/> Specific Oxygen Uptake Rate (SOUR) <1.5 mg/hr./gm TS @ 20°C. [503.33(b)(4)] <input type="checkbox"/> Aerobic Process for >14 days @ >40°C with average sludge temperatures >45°C. [503.33(b)(5)] <input type="checkbox"/> pH >12 for 2 hours and pH >11.5 for 22 hours [503.33(b)(6)] <input type="checkbox"/> Sludge (with no unstabilized solids) contains >75% Total Solids prior to mixing with other materials. [503.33(b)(7)] <input type="checkbox"/> Sludge (contains unstabilized solids) contains >90% Total Solids prior to mixing with other materials. [503.33(b)(8)]

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				<input type="checkbox"/> Subsurface Injection. [503.33(b)(9)] <input type="checkbox"/> Soil Incorporation. [503.33(b)(10)] <input type="checkbox"/> Sludge covered with soil or other material at the end of the day. [503.33(b)(11)]
Yes	No	N/A	14. Have any SDUs been closed?	
Yes	No	N/A	15. Has facility submitted closure and post closure plan for any active SDU 180 days prior to closing? [503.22(c)]	
Comments:				

Surface Disposal Footnotes:

⁽¹⁾ Table 1 of 503.23(a)(1) must be met for all sludge placed in an active surface disposal unit with a distance of greater than 150 meters from the boundary of the surface disposal unit to the property line. Site-specific limits can also be set by the permitting authority in accordance with 503.23(b).

Table 1 (mg/kg - dry weight basis)

Arsenic	73	Chromium	600	Nickel	420
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⁽²⁾ Table 2 of 503.23(a)(2) must be met for all sludge placed in an active surface disposal unit with a distance of less than 150 meters from the boundary of the surface disposal unit to the property line. Site-specific limits can also be set by the permitting authority in accordance with 503.23(b).

Table 2 (mg/kg - dry weight basis)

Distance between unit boundary and property line (m)	Pollutant Concentration (mg/kg)		
	Arsenic	Chromium	Nickel
0 to less than 25	30	200	210
25 to less than 50	34	220	240
50 to less than 75	39	260	270
75 to less than 100	46	300	320
100 to less than 125	53	360	390
125 to less than 150	62	450	420

⁽³⁾ Unless specific approval from the permitting authority has been obtained by the facility.

⁽⁴⁾ Facility must have results of groundwater monitoring study developed by a qualified groundwater scientist or a certification from a qualified groundwater scientist to demonstrate no contamination.

⁽⁵⁾ Facility must meet Class A pathogen reduction requirements of 503.32(a) or Class B 503.32(b)(2) through (b)(4) unless vector attraction reduction method 503.33(b)(11), covering sludge at the end of the day, is used.

⁽⁶⁾ Process to Significantly Reduce Pathogens (PSRP) includes Aerobic Digestion, Air Drying, Anaerobic Digestion, Composting, and Lime Stabilization. Process to Further Reduce Pathogens (PFRP) includes Composting, Heat Drying, Heat Treatment, Thermophilic Aerobic Digestion, Beta Ray Irradiation, Gamma Ray Irradiation, and Pasteurization. Each process has required operating conditions to demonstrate compliance. See 503 Appendix B and Unit Process Checklist.

⁽⁷⁾ Facility must meet vector attraction reduction requirements of 503.33(b) to surface dispose sludge.

Sludge Inspection Checklist

Yes	No	N/A	1. Does the incinerator meet the definition of a sewage sludge incinerator?
Yes	No	N/A	2. Do sewage sludge monitoring results show pollutant concentrations below permit limits?
Yes	No	N/A	3. Does THC monitoring show concentrations below 100 ppm (monthly average)?
Yes	No	N/A	4. Are there instruments installed that continuously measure and record THC (or alternatively CO), oxygen concentration, moisture content, and combustion temperatures?
Yes	No	N/A	5. Is the THC instrument calibrated as required by 503.45 (once every 24-hour period using propane) or the permit?
Yes	No	N/A	6. Are the other instruments calibrated as required by the permit?
Yes	No	N/A	7. Are the instruments operated and maintained as specified by the permit?
Yes	No	N/A	8. How many times was the incinerator operated at above the maximum combustion temperature specified in the permit? _____ For how long was the incinerator in operation above the maximum combustion temperature? _____
Yes	No	N/A	9. How many times was the incinerator operated outside the range of the air pollution control devices operating parameters specified in the permit? _____ For how long was the incinerator in operation outside the ranges? _____
Yes	No	N/A	10. Are the following records maintained:
Yes	No	N/A	Concentration of lead, arsenic, cadmium, chromium, and nickel in the sewage sludge fed to the sewage sludge incinerator.
Yes	No	N/A	THC concentrations in the exit gas.
Yes	No	N/A	Information that indicates NESHAP for beryllium in Subpart C of 40 CFR Part 61 is met.
Yes	No	N/A	Information that indicates NESHAP for mercury in Subpart E of 40 CFR Part 61 is met.
Yes	No	N/A	Combustion temperatures, including maximum combustion temperature.
Yes	No	N/A	Values for air pollution control device operating parameters.
Yes	No	N/A	Oxygen concentration.
Yes	No	N/A	Information used to measure moisture content in the exit gas.
Yes	No	N/A	Sewage sludge feed rate.
Yes	No	N/A	Stack height of incinerator.
Yes	No	N/A	Dispersion factor for the site.
Yes	No	N/A	Control efficiency for lead, arsenic, cadmium, chromium, and nickel.
Yes	No	N/A	Risk specific concentration for chromium (if applicable).
Yes	No	N/A	Calibration and maintenance log for the instruments used to measure THC (or CO), oxygen concentration, moisture content, and combustion temperatures.

Sludge Inspection Checklist

Yes	No	N/A	Are these records maintained for 5 years?
Yes	No	N/A	11. Have all instances of noncompliance been reported as specified by the permit?
Comments:			