

Record Keeping; *It IS Important!*

by Sherry Bock

If you need to ask the MPCA for a copy of ***YOUR*** records, you are in violation! Does that catch your attention? Hopefully so.



We have had many requests to get copies of records from permittees that land apply biosolids. I get it. There are things that do happen and legitimate reasons for needing a copy. For example, one city lost their records in the floods. I also get that sometimes you may take over for someone who isn't stellar in their organizational abilities and you can't find where s/he kept biosolids-related records (if they kept records). Whatever the reason for the missing records, the Permittee (the City) is in violation and could potentially receive an enforcement action. If you find yourself in a situation of missing records, it is best to call and work with either myself or your compliance staff to get copies as soon as you realize that information is missing and it is best to do so prior to an inspection rather than MPCA staff discovering it is missing. Good recording keeping is critical to being able to demonstrate compliance.

Here is a reminder of what records to keep:

Records to be kept indefinitely:

The location of land application and stockpile sites on a U.S.G.S quadrangle or soil map;

The legal descriptions of the sites;

The amount of biosolids applied for the cropping year and cumulatively in tons/acre;

The amount of metals applied for the cropping year and cumulatively in pounds/acre;

The date of biosolids application;

A signed certification statement for contacting the MPCA to see if a site has reached its cumulative pollutant loading rate;

A description of how the information to determine if a site has reached the cumulative pollutant loading rate was obtained.

Records to be kept for 5-years:

Continue - Page 32

Record Keeping Continued

Concentration of analytical parameters (metals, nutrients, solids content);
A signed certification statement for meeting pathogen and vector attraction reduction requirements;
A description of how the pathogen reduction requirements are met;
A description of how the vector attraction reduction requirements are met;
Records of soil test data;
Maximum Available Nitrogen Application (MANA) rate for the crop(s) grown;
The known amount of nitrogen applied to the crops for the cropping year;
The record of the applicator's certification statement (whether the preparer or a different party applies the biosolids) used to determine compliance with management practices, site restrictions and vector attraction reduction requirements (if injection or incorporation are used to meet the requirement). Preparers must keep as part of their records a description of how those requirements are met. (The certification statement that applies to management practices is number 4 on page 4 of the annual report.)

Additional information can be found in Chapter 13, starting on page 189, of the Biosolids Manual and in MN Rule 7041.1600, Record Keeping.

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MWOA Scholarships

The MWOA each year sets aside funds for up to four scholarships to be given at the Annual Awards Banquet in July. The goal is to award \$1000.00 for each scholarship along with a small stipend should the recipient and a guest be able to attend the banquet. In addition, a one year membership to the MWOA is granted to the recipient as well. In many cases – the amount available for the award is increased through the participation of other groups such as the MN Section of CSWEA or one of the Committees (Lab).

There will be preference given to MWOA members, son/daughter/niece/nephew.

Any student (or member) who is enrolled in a course of study related to water or wastewater can submit an application for the award. They must be at least half way through their course and achieve a passing grade for their effort. (Persons enrolled in a one or two year AS program must be at the half way point or greater when making application. A four year would require at least half of the credits required for graduation be completed. Should a person be working on a masters or advanced degree – supporting documentation from the institution should be made to indicate more than fifty percent completion on the course of study).

For more info go to MWOA.net and click on Scholarships.