

Compliance Guide for the Concentrated Aquatic Animal Production Point Source Category

Chapter 12: Record-keeping for Flow-through, Recirculating, and Net Pen Facilities

Full document available at
<http://www.epa.gov/waterscience/guide/aquaculture>

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Record-keeping

Good record-keeping is the hallmark of a well-operated aquatic animal production facility. Keeping records can help a facility run more efficiently and cleanly.

Examples of Record-keeping Practices

1) Develop a record-keeping system



Records, such as feeding, chemical use, water quality, serious weather conditions, aquatic animal inventory, and aquatic animal culture operations facilitate improvements in the overall efficiency of a facility.

Record-keeping is a basic business practice and is applicable to all facilities. If a facility already has record-keeping structures in place, the existing structures can be directly used or easily adapted to incorporate any additional record-keeping requirements of the CAAP ELGs.

Record keeping is a simple, easily implemented, and cost effective management tool. Complete, well-organized records can help ensure proper maintenance of facilities and equipment and can aid in determining the causes of required repairs to help prevent future foreseeable disasters.

The following are important points to remember when performing record-keeping:

- Records must be updated regularly.
- Personnel completing and maintaining records must be trained to update records correctly.

- Records need to be readily accessible.
- Records containing any confidential information must be secured (enforcement staff can still have access to these records).

The key to maintaining records is continual updating. Ensure that new information, such as inspections of your production systems, is added to existing records as it becomes available. In addition, update records if there are changes to the number and location of discharge points, or material storage procedures. You should maintain records for at least five years from the date of sample observation or action. Some simple techniques used to accurately document and report results include:

- Forms and logs.
- Field notebooks.
- Timed and dated photographs.
- Videotapes.
- Drawings and maps.
- Computer spreadsheets and database programs.

Paper copies of records should be maintained for archival purposes; computerized record-keeping tools can be used for trend analysis and forecasting. Records should be reviewed periodically to determine if they are useful and to provide insight into opportunities for improvement of CAAP facility operation.

EPA encourages the use of existing record-keeping systems (if available at your facility) to meet the record-keeping requirements of the CAAP ELGs. However,

if you need examples of forms and logs that help fulfill record-keeping requirements of the CAAP ELGs, refer to the appendices below. Some appendices contain forms and logs for activities that are not required by the ELGs, but that can be used to show your facility has met other requirements of the ELGs (e.g., showing your facility performed employee training).

- Appendix M: General Reporting Forms (*meets the CAAP ELGs general reporting requirements for INADs and extralabel drug use; failure or damage to containment systems; and spills of drugs, pesticides, and feed*)
- Appendix N: Feed Conversion Ratios Log (*may be used to track feeding and to calculate FCRs; meets the CAAP ELGs record-keeping requirements for solids control*)
- Appendix O: Spills and Leaks Log (*may be used to keep track of spills*)
- Appendix P: Inspection and Maintenance Logs (*may be used to keep track of when you perform maintenance and cleaning at your facility; meets the CAAP ELGs record-keeping requirements for maintenance*)
- Appendix Q: Cleaning Log (*may be used to document cleaning of your production systems and/or wastewater treatment systems; meets the CAAP ELGs record-keeping requirements for cleaning*)
- Appendix R: Record-keeping Checklist (*may be used to make sure you have met the record-keeping requirements of the CAAP ELGs*)
- Appendix S: Employee Training Log (*may be used to track employee training*)

- Appendix T: Carcass Removal Log (*may be used to keep track of the number of carcasses removed and disposal methods for the carcasses*)

2) Develop a record-keeping system for spills



EPA requires you to report spills when they occur. EPA encourages you to keep track of spills at your facility. Records of past spills contain useful information (e.g., what practices worked best for a given magnitude and type of spill) for improving practices to prevent future spills. Typical items that should be recorded include results of routine inspections, and reported spills, leaks, or other discharges. Records should include:

- The date, exact place, and time of material inventories, site inspections, sampling observations, etc.
- Names of inspector(s) and sampler(s).
- If applicable, analytical information, including date(s) and time(s) analyses were performed or initiated, analytical techniques or methods used, the analysts' names, analytical results, and quality assurance/quality control results of such analyses.
- The date, time, exact location, and a complete characterization of significant observations, including spills or leaks.
- Notes indicating the reasons for any exceptions to standard record keeping procedures.

Refer to Appendix O for an example log to track spills at your facility.