



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

October 6, 2008

RE: ASHTABULA COUNTY  
VILLAGE OF ANDOVER  
SEWAGE SLUDGE INSPECTION

Mayor and Council  
Village of Andover  
134 Maple Street  
Andover, Ohio 44003

Dear Mayor and Council:

On September 17, 2008, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) Rule 3745-40, Ohio's sewage sludge rules, at the Village of Andover's wastewater treatment plant (WWTP). I was accompanied by Mr. Richard Blasick, DSW Environmental Manager, and Ms. Virginia Wilson, DSW Environmental Specialist. Mr. Dean Bullard, Superintendent, was present during the sewage sludge inspection and provided information regarding the WWTP's sewage sludge operations and records. The sewage sludge inspection consisted of a review of the WWTP's contact information, completion of the compliance checklist, a review of the WWTP's sewage sludge records, and a walk through of the WWTP sewage sludge treatment units.

The WWTP currently treats approximately 280,000 gallons of wastewater per day. Sewage sludge is treated within two aerobic digesters, a sewage sludge belt filter press, drying beds, and a concrete holding bin. Total onsite storage for sewage sludge is approximately 173 days.

The WWTP is currently performing pathogen reduction alternative 1, geometric mean of seven fecal coliform samples. During the sewage sludge inspection, Mr. Bullard stated that vector attraction reduction option 10, immediate incorporation, was being preformed by incorporating sewage sludge into the soil within twenty-four hours. OAC Rule 3745-40-05(Q)(10) requires that "sewage sludge applied to the land surface shall be incorporated into the soil within six hours after application to or placement on the land, unless otherwise specified by the director." **The WWTP must immediately begin satisfying the six hour soil incorporation requirement of VAR option 10.**

Ohio EPA records also indicate that the WWTP failed to comply with the following parameter's monitoring frequency established within the WWTP's NPDES permit during November 2006, June 2007, September 2007, and June 2008:

Station	Reporting Code	Parameter	Frequency
581	70316	Sludge Weight	1/Day
581	70318	Sludge Solids, Percent	1/Day
581	70322	Sludge Solids, percent	1/Day

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**The WWTP must submit information as to why the above monitoring events were not performed.**

The WWTP's authorized sewage sludge sites are to be monitored for pH and Phosphorus in the spring of 2009 to comply with the monitoring requirements established within OAC Rule 3745-40-06(E).

During the inspection, it became apparent that routine maintenance of wastewater and sewage sludge treatment units was not occurring. Mr. Bullard appears to be overwhelmed with having to solely perform the numerous duties associated with operating a WWTP (i.e. record keeping, daily operation activities, maintenance activities, etc.). Unfortunately, as a result, routine equipment repair and maintenance of treatment units is not occurring in a timely fashion. Ohio EPA has concerns over the current staffing level at the WWTP.

Please be aware that Ohio EPA is currently soliciting comments on the draft sewage sludge rules and the public comment deadline is 5:00 p.m. on October 10, 2008. For your convenience, the draft sewage sludge rules can be obtained at the following internet address:

[http://www.epa.state.oh.us/dsw/rules/draft\\_sludge\\_july08.html](http://www.epa.state.oh.us/dsw/rules/draft_sludge_july08.html)

The Village of Andover's sewage sludge disposal program was not in compliance with OAC 3745-40. Within fourteen (14) days of receiving this inspection letter, please submit a written response as to how the Village of Andover will address the above deficiencies. Should you have any questions regarding the sewage sludge inspection, please contact me at your earliest convenience at (330) 963-1118.

Sincerely,



Chris Moody  
Environmental Specialist  
Division of Surface Water

CM/mt

cc: Dean Bullard

ec: Virginia Wilson, Ohio EPA, DSW, NEDO  
Andrew Gall, Ohio EPA, DSW, NWDO  
Jacob Howdyshell, Ohio EPA, DSW, CO