



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 9, 2008

RE: WAYNE COUNTY
APPLE CREEK WWTP
SEWAGE SLUDGE INSPECTION

Mayor and Council
63 East Main Street
P.O. Box 208
Apple Creek, Ohio 44606

Dear Mayor and Council:

On August 28, 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 Apple Creek wastewater treatment plant (WWTP). Mr. Chuck Ogle, Operator, 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 a compliance checklist, a review of the WWTP's sewage sludge records, and a walk through of the WWTP sewage sludge units.

The WWTP currently has an average daily flow of approximately 190,000 gallons per day. Sewage sludge generated at the WWTP is treated via two (2) aerobic digesters (2 x 93,000 gallons). The WWTP also has an additional two (2) aerobic digesters (2 x 20,000 gallons) available for use at a secondary WWTP that is not currently in use.

According to Mr. Ogle, the WWTP currently has approximately 1,200 days of sewage sludge storage capacity. The WWTP anticipates that land application of sewage sludge will occur in October 2008. Mr. Ogle stated that pathogen reduction alternative No. 1, the geometric mean of seven fecal coliform samples, and vector attraction reduction option No. 4, specific oxygen uptake rate, will be performed prior to land application of sewage sludge occurring. **Ohio EPA requests the WWTP to inform Ohio EPA of the next date when land application of sewage sludge is going to occur.**

OAC rule 3745-40-06(I) and (J) require specific records to be maintained by the WWTP for five years. Unfortunately, the WWTP was unable to produce various records to document that the required information has been recorded for the previous five years. **The WWTP must immediately begin recording and maintaining records in accordance with OAC Rule 3745-40-06(I) and (J).** Mr. Ogle stated that WWTP will maintain records in accordance with OAC Rule 3745-40.

The WWTP was unable to produce records to document that Agri-Sludge, Inc. has recorded the required information for the previous five years. **The WWTP must immediately submit information documenting that the information required in OAC Rule 3745-40-06(J), has been maintained for the previous five years.** During the inspection, Mr. Ogle did not know the management practices Agri-Sludge, Inc. was performing. It is highly recommended that the WWTP request Agri-Sludge, Inc. to provide the above required information regularly to the WWTP in order for the WWTP to have complete sewage sludge land application records.

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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:

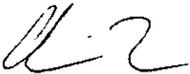
Station	Reporting Code	Parameter	Frequency	Date
581	51129	Sludge Fee Weight	1/Year	12/01/2007

The WWTP must submit information as to why the above monitoring event, provided above, was not performed.

The WWTP was unable to produce records to document that the sewage sludge application sites have been monitored within the last two years. OAC Rule 3745-40-06(E) provides that for authorized sewage sludge application sites, the frequency of monitoring for soil pH and soil phosphorus level (Bray-Kurtz P1 extraction or Mehlich 3 extraction) shall be such that the most recent results are not more than two years old at the time of bulk sewage sludge land application. Mr. Ogle was unaware if the fields were being analyzed by the WWTP's sewage sludge contractor, Agri-Sludge, Inc., and agreed to contact Agri-Sludge, Inc. in order to confirm if the application sites have been analyzed within the past two years. **The WWTP must ensure that monitoring sewage sludge application sites for pH and soil phosphorus have occurred in accordance with OAC Rule 3745-40-06(E).**

The WWTP's sewage sludge disposal program appeared to not be in compliance with OAC Rule 3745-40. 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/mh

cc: Mr. Chuck Ogle

ec: Laura Weber, Ohio EPA, DSW, NEDO
Andrew Gall, Ohio EPA, DSW, NWDO
Jacob Howdyshell, Ohio EPA, DSW, CO