



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

March 23, 2010

RE: SUMMIT COUNTY  
BARBERTON WWTP  
SEWAGE SLUDGE  
INSPECTION

Mayor and Council  
Barberton City Hall  
576 West Park Avenue  
Barberton, Ohio 44203

Dear Mayor and Council:

This letter serves to provide guidance for the City of Barberton wastewater treatment plant (WWTP), National Pollutant Discharge Elimination System (NPDES) permit No. 3PD00004\*JD, regarding the management of exceptional quality (EQ) sewage sludge. It is my understanding after talking with Denny Weaver, Superintendent, on March 22, 2010, that the WWTP has not added street sweepings to the EQ sewage sludge. In addition, the WWTP has not been adding any other amendment materials (i.e. composted leaves, etc.) to the EQ sewage sludge to generate a mixed product.

Please be aware that U.S. EPA's guidance document entitled *Environmental Regulations and Technology: Control of Pathogens and Vector Attraction in Sewage Sludge* (guidance document) states the following:

**Section 3.6 - Sampling Stockpiled or Remixed Biosolids (Page 23)**

*...“if the preparer mixes the EQ biosolids or otherwise changes the quality of the biosolids, the new biosolids product must again comply with pathogen reduction, vector attraction reduction, and microbiological requirements.”*

**Frequently Asked Questions (Page 87)**

*“If I produce an “exceptional quality” (EQ) product and mix the product with topsoil before distribution, does the mix have to be tested for 503 compliance?”*

*Regulations regarding “exceptional quality” material, or material which complies with the highest levels of pathogen and vector attraction reduction as well as heavy metals limits, are based on when the sludge preparer loses control of the material. If the EQ material is still within your control (i.e. on-site or owned by the preparer) when it is mixed, the new product must undergo pathogen and vector attraction reduction processes and be analyzed for Part 503 parameters including pathogens, vector attraction reduction, and heavy metals. This may be*

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*problematic for some facilities since a mix of stable compost and soil, for example, is unlikely to meet/undergo PFRP time and temperature requirements. You may have to test the mix for helminth ova and enteric viruses in order to demonstrate compliance with Class A pathogen reduction."*

If the WWTP, in the future, elects to add amendment materials to the EQ sewage sludge, the mixed product must also be monitored for pathogen reduction, vector attraction reduction, and heavy metals, in accordance with U.S. EPA's guidance document.

During the March 22, 2010 conversation, Mr. Weaver stated that the WWTP has not been adding screened street sweepings to the EQ sewage sludge, but was considering performing and evaluation of such a mixed product. Please be aware that street sweepings are considered a solid waste material that must be managed appropriately (i.e. disposal within municipal solid waste landfill). However, the Division of Solid and Infectious Waste Management (DSIWM) does have an Integrated Alternative Waste Management Program (IAWMP) that may be used to approve alternative waste disposal projects pursuant to Ohio Administrative Code (OAC) rule 3745-27-05(A)(4). For additional information regarding the IAWMP, please contact Dave Dysel of DSIWM or refer to the Alternative Waste Management Project Request Form, which can be obtained from the following Web site address:

<http://www.epa.ohio.gov/dsiwm/pages/forms.aspx>

Should you have any questions regarding Ohio's sewage sludge rules, OAC 3745-40, please contact me at your earliest convenience at (330) 963-1118.

Sincerely,



Chris Moody  
Environmental Specialist  
Division of Surface Water

CM/ams

cc: Denny Weaver, Superintendent, Barberton WWTP

ec: Kelvin Rogers, Ohio EPA, DSW, NEDO  
Dave Dysle, Ohio EPA, DSIWM, NEDO  
Andrew Gall, Ohio EPA, DSW, NWDO  
Jacob Howdysell, Ohio EPA, DSW, CO