



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 7, 2008

RE: WAYNE COUNTY
DOYLESTOWN, VILLAGE OF
SEWAGE SLUDGE INSPECTION

Mayor Terry Lindeman
24 South Portage Street
Doylestown, OH 44230

Dear Mayor Lindeman:

On April 23, 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 Doylestown wastewater treatment plant (WWTP). Mr. Dennis White, General Manager of Utilities, 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 enclosed compliance checklist, a review of the WWTP's sewage sludge records, and a walk through of the WWTP sewage sludge units. The sewage sludge inspection documented the following:

The WWTP currently treats approximately 350,000 gallons of wastewater per day. Sewage sludge generated at the WWTP is treated within one aerobic digester (70,000 gallons), one anaerobic digester (85,000 gallons) and one lagoon (120,000 gallons). The sewage sludge is treated to Class B via pathogen reduction (PR) alternative 1, geometric mean of seven fecal coliform samples, and vector attraction reduction (VAR) options 4, specific oxygen uptake rate, or 9, injection. The WWTP did not yet have the analytical results returned from the laboratory for the most recent sewage sludge monitoring for PR and VAR. On May 7, 2008, analytical results were faxed documenting that PR and VAR were satisfied.

According to the WWTP's 2007 Annual Sewage Sludge Report, the WWTP is performing PR alternative 2, aerobic digestion. In order to satisfy PR alternative 2, aerobic digestion, specific records of temperature and the mean cell residence time of the sewage sludge must be maintained. Mr. White stated during the inspection that the WWTP is performing PR alternative 1, geometric mean of seven fecal coliform samples. The WWTP must report the correct PR and VAR that are being performed to generate a Class B sewage sludge on all future Annual Sewage Sludge Reports.

The WWTP currently utilizes authorized sewage sludge land application sites. According to Mr. White, the appropriate signage has been placed at each authorized sewage sludge land application site. The WWTP utilizes a contractor, Agri-Sludge, Inc., to land apply the treated sewage sludge, which occurs approximately three to four times per year. During the inspection, records of pH and Phosphorus for the authorized sewage sludge land application sites were unavailable. Mr. White committed to contacting Agri-Sludge, Inc. to confirm that the pH and Phosphorus monitoring is occurring at a frequency of two years.

Ohio EPA records indicate that the following NPDES frequencies for Station 581 were not satisfied:

Reporting Code	Parameter	Frequency	Date of Occurrence
00400	pH	1/Month	09/01/2006
00627	Nitrogen Kjeldahl, Total in Sludge	1/Year	09/01/2006
00668	Phosphorus, Total In Sludge	1/Year	09/01/2006
01003	Arsenic, Total In Sludge	1/Year	09/01/2006
01028	Cadmium, Total In Sludge	1/Year	09/01/2006
01029	Chromium, Total In Sludge	1/Year	09/01/2006
01043	Copper, Total In Sludge	1/Year	09/01/2006
01052	Lead, Total In Sludge	1/Year	09/01/2006
01068	Nickel, Total In Sludge	1/Year	09/01/2006
01093	Zinc, Total In Sludge	1/Year	09/01/2006
01148	Selenium, Total In Sludge	1/Year	09/01/2006
71921	Mercury, Total In Sludge	1/Year	09/01/2006
78465	Molybdenum In Sludge	1/Year	09/01/2006
99991	Nitrogen, Ammonia In Sludge	1/Year	09/01/2006
00400	pH	1/Month	02/01/2007
00627	Nitrogen Kjeldahl, Total in Sludge	1/Year	09/01/2007
00668	Phosphorus, Total In Sludge	1/Year	09/01/2007
01003	Arsenic, Total In Sludge	1/Year	09/01/2007
01028	Cadmium, Total In Sludge	1/Year	09/01/2007
01029	Chromium, Total In Sludge	1/Year	09/01/2007
01043	Copper, Total In Sludge	1/Year	09/01/2007
01052	Lead, Total In Sludge	1/Year	09/01/2007
01068	Nickel, Total In Sludge	1/Year	09/01/2007
01093	Zinc, Total In Sludge	1/Year	09/01/2007
01148	Selenium, Total In Sludge	1/Year	09/01/2007
71921	Mercury, Total In Sludge	1/Year	09/01/2007
78465	Molybdenum In Sludge	1/Year	09/01/2007
99991	Nitrogen, Ammonia In Sludge	1/Year	09/01/2007

The WWTP must submit information detailing why the above monitoring events were not performed.

Due to a recent U.S. EPA clarification regarding certification statements, the signed certification statements located on the annual sewage sludge reports can no longer be utilized to satisfy the certification statements established within OAC Rule 3745-40-06(I). Effective immediately, the WWTP must maintain and submit annually the following certification statements provided within OAC Rule 3745-40-06(I):

"I certify, under penalty of law, that the information that will be used to determine compliance with class (insert A or B) pathogen reduction alternative (insert one of the class A alternatives in paragraphs (N)(1) to (N)(6) of rule 3745-40-05 of the Administrative Code or one of the class B alternatives in paragraphs (O)(1) to (O)(3) of rule 3745-40-05 of the Administrative Code) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."; and

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"I certify, under penalty of law, that the information that will be used to determine compliance with vector attraction reduction requirement (insert one of the vector attraction reduction requirements in paragraphs (Q)(1) to (Q)(8) of rule 3745-40-05 of the Administrative Code) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

The certification statements should be separate from all other records and on a stand alone document.

The WWTP's sewage sludge disposal program appeared to not be in compliance with OAC Rule 3745-40. Within fourteen (14) days of receiving this letter, please submit a written response as to how the WWTP 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: Dennis White, Utilities Manager