



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

August 27, 2008

RE: SUMMIT COUNTY  
TWINSBURG WWTP  
SEWAGE SLUDGE INSPECTION

The Honorable Katherine Procop, Mayor  
City of Twinsburg  
10075 Ravenna Road  
Twinsburg, Ohio 44087

Dear Mayor Procop:

On August 13, 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 Twinsburg wastewater treatment plant (WWTP). I was accompanied by Mrs. Jennifer Bennage of Ohio EPA. Mr. John Adams, Superintendent, and Mr. Chris Campbell, Public Works Director, were 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 treatment units.

The WWTP currently treats approximately 2.98 million gallons of wastewater per day. Generated sewage sludge is treated within two primary anaerobic digesters (total capacity of 1,265,960 gallons) that are heated, one secondary anaerobic digester (capacity of 214,027 gallons), and two 1.0 meter belt presses. A Class B sewage sludge is generated utilizing pathogen reduction alternative No. 4, anaerobic digestion, and vector attraction reduction option No.1, 38% volatile solids reduction.

A review of monthly operating report (MOR) data supplied by the WWTP indicates that the following permit exceedance occurred:

<b>Station 581 Sewage Sludge MOR Data</b>		
<b><u>Parameter</u></b>	<b><u>Date of Exceedance</u></b>	<b><u>Concentration</u></b>
Lead, In Sludge	8/1/2007	690 mg/kg

Since the permit exceedance was above the Table 3 pollutant monthly average concentrations (ie. Lead 300 mg/kg) and below the Table 1 pollutant ceiling concentrations (ie. Lead 840 mg/kg), established within OAC Rule 3745-40-05(F), the authorized sewage sludge sites where land application occurred are designated as

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CPLR. The designated CPLR sewage sludge sites are required to satisfy the requirements of OAC Rule 3745-40-06(K).

During a November 15, 2006 sewage sludge inspection, Mr. Rick Swiger, former Superintendent, stated that the WWTP had greater than 120 days of on-site sewage sludge storage capacity. During the August 13, 2008 sewage sludge inspection, Mr. Adams provided information detailing that the WWTP actually has approximately 30 days of on-site sewage sludge storage capacity. OAC Rule 3745-40-04(T) requires that a WWTP's storage of sewage sludge shall consist of 120 days sewage sludge storage for the design capacity of the treatment works unless engineered or contracted alternatives are available. Alternatives to facility storage of sewage sludge include, but are not limited to, the following:

- (1) Contracts in effect with a sanitary landfill and sufficient transportation to dispose of sewage sludge that cannot be otherwise managed through facility storage of sewage sludge or other means of use or disposal;
- (2) Contracts in effect with another permitted facility and sufficient transportation to transfer sewage sludge that cannot be otherwise managed through facility storage of sewage sludge or other means of use or disposal; or
- (3) Ownership or leasing of, or contracts in effect with, a regional storage of sewage sludge facility and sufficient transportation to transfer sewage sludge that cannot be otherwise managed through facility storage of sewage sludge or other means of use or disposal.

The WWTP must address the 120 day on-site sewage sludge storage capacity requirement either by constructing additional sewage sludge storage or obtaining an alternative to on-site sewage sludge storage. Mr. Adams stated that the walls of the sewage sludge drying beds would be heightened to provide the 120 day on-site sewage sludge storage capacity.

Ohio EPA is currently soliciting comments on the draft sewage sludge rules. Please be aware that 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 Twinsburg WWTP's sewage sludge disposal program appeared not to be in compliance with OAC 3745-40. Within 14 days of receiving this inspection letter, please submit a written response as to how the Twinsburg WWTP will address the above

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issues. Should you have any questions regarding the sewage sludge inspection, please contact me at your earliest convenience at (330) 963-1118.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Moody".

Chris Moody  
Environmental Specialist  
Division of Surface Water

CM/mh

pc: Mr. Chris Campbell, Public Works Director  
Mr. John Adams, Superintendent

ec: Jennifer Bennage, Ohio EPA, DSW, NEDO  
Andrew Gall, Ohio EPA, DSW, NWDO  
Jacob Howdyshell, Ohio EPA, DSW, CO