

**Environmental
Protection Agency**

Joe Straubach, Governor
Lee Fisher, Lt. Governor
Chris Foneska, Director

October 27, 2010

RE: WAYNE COUNTY
CRESTON WWTP
NPDES PERMIT NO. OH0022172
OHIO EPA PERMIT NO. 3PB00012*HD
SEWAGE SLUDGE INSPECTION

Mr. William Armentrout, Mayor
Village of Creston
P.O. Box 194
Creston, Ohio 44217

Dear Mayor Armentrout:

On October 13, 2010, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) 3745-40, Ohio's sewage sludge rules, at the Creston wastewater treatment plant (WWTP). The facility was represented by Mark Allen, Superintendent, who 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 sewage sludge records, and an evaluation of the sewage sludge treatment units.

The WWTP currently treats approximately 230,000 gallons of wastewater per day. Sewage sludge is treated within two aerobic digesters, four sand drying beds, and two concrete pads. Onsite sewage sludge storage capacity exceeds 120 days.

A class B sewage sludge is generated by the WWTP via pathogen reduction alternative (PR) No. one, geometric mean of seven fecal coliform samples, and vector attraction reduction (VAR) No. 4, specific oxygen uptake rate.

PR alternative

Mr. Allen detailed the procedure for satisfying the PR requirement as seven grab samples are composited into one sample that is approximately four percent (4%) solids. The initial seven samples are diluted to obtain a fecal coliform result of twenty to sixty colonies. The result is then multiplied by the dilution factor. A copy of the geometric coliform calculation performed on October 16, 2010 was provided to Ohio EPA. Mr. Allen stated that he thought Standard Method 9216 was being utilized. On October 14, 2010, Mr. Allen left a voicemail clarifying that Standard Method 9230c is utilized for performing PR alternative No. 1.

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Ohio Administrative Code (OAC) rule 3745-40-06(G) requires a permittee to collect and analyze representative fecal coliform samples of sewage sludge in accordance with Part 9221 E. or Part 9222 D., "Standard Methods for the Examination of Water and Wastewater." The WWTP must immediately begin performing fecal coliform monitoring of sewage sludge in accordance with OAC rule 3745-40-06(G). Prior to performing land application of sewage sludge, the WWTP must submit to Ohio EPA a copy of the seven fecal coliform results and the geometric mean calculation utilized to verify that PR No. 1 is being satisfied.

Additional information regarding how to properly perform and calculate PR No. 1 can be obtained from U.S. EPA's "Environmental Regulations and Technology Control of Pathogens and Vector Attraction in Sewage Sludge" document, which can be obtained from the following Internet address:

http://water.epa.gov/scitech/wastetech/biosolids/biosolids_index.cfm

According to Ohio EPA records, the following frequency violations have occurred at the WWTP:

581	31641	Fecal Coliform in Slud	1/Year	1	0	09/01/2008
581	51129	Sludge Fee Weight	1/Year	1	0	09/01/2008
581	51131	Fecal Coliform in Slud	1/Year	1	0	09/01/2008
581	51131	Fecal Coliform in Slud	1/Year	1	0	09/01/2009
581	01029	Chromium, Total In Slu	1/Year	1	0	09/01/2010
581	70316	Sludge Weight	1/Year	1	0	09/01/2010
581	70318	Sludge Solids, Percent	1/Month	1	0	09/01/2010
581	70322	Sludge Solids, Percent	1/Month	1	0	09/01/2010
581	51129	Sludge Fee Weight	1/Year	1	0	09/01/2010
581	51131	Fecal Coliform in Slud	1/Year	1	0	09/01/2010
584	31641	Fecal Coliform in Slud	1/Year	1	0	09/01/2008
584	51129	Sludge Fee Weight	1/Year	1	0	09/01/2008
584	71202	Salmonella Sp.	1/Year	1	0	09/01/2009
584	81401	Enteric Viruses Plaque	1/Year	1	0	09/01/2009
584	51130	Viable Helminth Ova in	1/Year	1	0	09/01/2009
584	01029	Chromium, Total In Slu	1/Year	1	0	09/01/2010
584	70316	Sludge Weight	1/Year	1	0	09/01/2010
584	70318	Sludge Solids, Percent	1/Month	1	0	09/01/2010
584	70322	Sludge Solids, Percent	1/Month	1	0	09/01/2010
584	71202	Salmonella Sp.	1/Year	1	0	09/01/2010
584	81401	Enteric Viruses Plaque	1/Year	1	0	09/01/2010
584	51129	Sludge Fee Weight	1/Year	1	0	09/01/2010
584	51130	Viable Helminth Ova in	1/Year	1	0	09/01/2010

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By November 15, 2010, written correspondence must be submitted to Ohio EPA that addresses how the sample collection and geometric mean calculation for PR No. 1 will be corrected and why the frequency violations, as detailed above, have occurred. 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 'CM', written over a light blue horizontal line.

Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt