



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

February 17, 2010

RE: HOLMES COUNTY
KILLBUCK WWTP
SEWAGE SLUDGE INSPECTION

Mayor and Council
Village of Killbuck
P.O. Box 424
Killbuck, Ohio 44637-0424

Dear Mayor and Council:

On February 2, 2010, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) Chapter 3745-40, Ohio's sewage sludge rules, at the Killbuck wastewater treatment plant (WWTP). Mr. Mike Judson, Superintendent, 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 an evaluation of the WWTP sewage sludge treatment units.

- The WWTP currently treats approximately 200,000 gallons of wastewater per day. Sewage sludge is treated within three aerobic digesters and is dewatered in four drying beds. Mr. Judson stated that there are no plans for constructing a concrete storage pad in the immediate future.
- The WWTP currently has greater than 120 days of onsite sewage sludge storage capacity as sewage sludge has been stored on the drying beds since May 17, 2009. At the time of the inspection, two drying beds were still available for use.
- A Class B sewage sludge is being generated by satisfying pathogen reduction alternative No. 1, geometric mean of seen fecal coliform samples, and vector attraction reduction option No. 1, 38% volatile solids reduction. Records are currently being maintained that verify compliance.
- Mr. Judson stated that he was unsure if the appropriate signage was placed at the fields utilized for land application and committed to contacting Agri-Sludge, Inc., the WWTP's contractor, to verify if signage had been placed. Via a February 3, 2010 e-mail, Mr. Judson provided information documenting that the appropriate signage was placed at the fields utilized for land application.
- At the time of the inspection, the certification statements were not being maintained in accordance with OAC rule 3745-40-06. On February 3, 2010, the WWTP faxed Ohio EPA signed certification statements dated January 25, 2010. Records are currently being maintained that verify compliance.

- In accordance with OAC rule 3745-40-04(E), the WWTP must provide a label or information sheet to (1) all persons who receive bulk sewage sludge from the WWTP; (2) all persons who land apply bulk sewage sludge received from the WWTP; and (3) the owner or lease holder of the land upon which the bulk sewage sludge is land applied. A copy of the label or information sheet that is utilized by the WWTP must be submitted to Ohio EPA.

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

Station No.	Reporting Period	Reporting Code	Parameter	Frequency
581	06/01/2008	71921	Mercury, Total In Sludge	1/Quarter
581	06/01/2008	78465	Molybdenum In Sludge	1/Quarter
581	06/01/2008	31641	Fecal Coliform in Sludge	1/Quarter
581	06/01/2008	51129	Sludge Fee Weight	1/Quarter
581	12/01/2008	71921	Mercury, Total In Sludge	1/Quarter
581	12/01/2008	78465	Molybdenum In Sludge	1/Quarter
581	12/01/2008	31641	Fecal Coliform in Sludge	1/Quarter
581	12/01/2008	51129	Sludge Fee Weight	1/Quarter
581	03/01/2009	71921	Mercury, Total In Sludge	1/Quarter
581	03/01/2009	31641	Fecal Coliform in Sludge	1/Quarter
581	03/01/2009	51129	Sludge Fee Weight	1/Quarter
581	06/01/2009	70316	Sludge Weight	1/Quarter

While significant improvements have been achieved in bringing the WWTP towards compliance with OAC rule 3745-40, unfortunately, some noncompliance issues remain that still must be addressed. The following must be submitted to Ohio EPA:

- Information must be submitted that addresses the above NPDES frequency violations.
- A copy of the of the label or information sheet that is utilized by the WWTP.

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