



State of Ohio Environmental Protection Agency

Northeast District Office

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

December 7, 2007

RE: STARK COUNTY
MASSILLON, CITY OF
SEWAGE SLUDGE INSPECTION

Mr. Francis Cicchinelli, Mayor
Municipal Government Annex
151 Lincoln Way East
Massillon, OH 44646

Dear Mayor Cicchinelli:

On November 15, 2007, 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 Massillon wastewater treatment plant (WWTP). Mr. Tony Ulrich, Operations 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 a walk through of the WWTP sewage sludge treatment units.

The WWTP currently treats approximately 10.2 million gallons of wastewater per day. During the inspection Mr. Ulrich stated that the WWTP was recently upgraded in 2006 and currently treats primary and secondary sewage sludge with two blending tanks, two gravity belt thickeners, two anaerobic digesters (primary is heated), and two sewage sludge belt presses. The WWTP also has a sewage sludge storage pad that is not utilized due to odor concerns. Mr. Ulrich provided that the WWTP only has an on-site sewage sludge storage capacity of sixty (60) days (thirteen days in the secondary digester and forty-seven days on the sewage sludge storage pad), which is less than the required 120 day on-site sewage sludge storage capacity requirement; however, the WWTP's contingency plan is to haul sewage sludge to a solid waste landfill that is licensed to accept such material.

During the inspection, Mr. Ulrich stated that the WWTP had not violated its NPDES permit in 2007 for sewage sludge (Station 581). According to Ohio EPA records, the WWTP exceeded the monthly average concentration for the following parameter:

Parameter	Date	Concentration
Arsenic, total in Sludge	4/6/2006	46.647 mg/kg

Since the WWTP is generating a class B sewage sludge, the agricultural field that the high Arsenic sewage sludge was applied to is considered a Cumulative Pollutant Loading Rate (CPLR) field. Specific records must be maintained, in accordance with OAC Rule 3745-40, for any CPLR field the WWTP utilizes. The WWTP must submit to Ohio EPA the current CPLR records for the field where this sewage sludge was land applied. If the sewage sludge was not land applied, the WWTP must submit information to Ohio EPA regarding how the sewage sludge was disposed, the date the sewage sludge was disposed, and the amount of sewage sludge disposed.

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Ohio EPA records also indicate that the WWTP failed to comply with the following parameter's monitoring frequency established within the WWTP's NPDES permit:

Parameter	Date	Frequency
Fecal Coliform in Sludge (MPN/G)	6/10/2006	1/Day
Fecal Coliform in Sludge (MPN/G)	5/9/2007	1/Day

The WWTP must submit information as to why the above monitoring events, provided above, were not performed.

Ohio EPA records indicate that numerous "AB," "AE," and "AH" reporting codes were utilized to report various sewage sludge parameters from August 2005 through September 2007, see table provided below. Unfortunately, no comments were provided explaining why these reporting codes were utilized. The WWTP must submit information documenting why the "AB," "AE," and "AH" reporting codes were utilized. The WWTP must begin providing comments when such reporting codes are utilized.

Station 581			
Parameter	Reporting Code		
	AB	AE	AH
Fecal Coliform (MPN/G)	2	8	401
pH (S.U.)	2	3	341
Sludge Fee Weight (Dry Tons)	1	0	405
Sludge Weight (Dry Tons)	2	0	404

The WWTP currently is generating a class B sewage sludge by satisfying pathogen reduction alternative 2c, anaerobic digestion. According to Mr. Ulrich, the average mean cell residence time is twenty-eight (28) days at an average temperature of 98.2 degrees Fahrenheit. The WWTP is satisfying vector attraction reduction option 1, thirty-eight percent (38%) volatile solids reduction. The average volatile solids reduction at the WWTP is approximately sixty-one percent (61%).

During the inspection, Mr. Ulrich stated that Agri-Sludge, Inc. is the contractor that removes sewage sludge from the WWTP. Agri-Sludge, Inc. removes sewage sludge from the WWTP approximately four days a week with two truckloads occurring per day. Burch Hydro, Inc. is the contractor that spreads the WWTP's sewage sludge upon authorized agricultural fields. I inquired if sewage sludge is spread immediately upon being received at authorized agricultural fields or if sewage sludge analytical results from monitoring are received prior to spreading. Mr. Ulrich stated that sewage sludge samples are collected as the sewage sludge is coming off the belt press and being loaded into the truck for hauling to the authorized agricultural field. I informed Mr. Ulrich that the monitored sewage sludge should not be land applied until the laboratory analytical results confirm that the sewage sludge satisfies the class B requirements established within OAC Rule 3745-40. Mr. Ulrich will contact Burch Hydro, Inc. to ensure that land application is not initiated until the sewage sludge analytical results confirm that the sewage sludge is class B.

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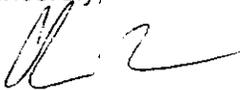
Ohio EPA requests the WWTP to submit information as to the locations where sewage sludge land application is expected to occur through February 29, 2008. Specifically, Ohio EPA requests a copy of the typical schedule of when Agri-Sludge, Inc. removes sewage sludge from the WWTP, and the typical schedule of when Burch Hydro, Inc. land applies the sewage sludge to the authorized sewage sludge site. In addition, the WWTP must provide the locations (i.e., township name and Ohio EPA I.D. number) where the sewage sludge is to be land applied.

Please be aware that the deadline for submitting the WWTP's 2007 Annual Sewage Sludge Report is January 31, 2008. The 2007 Annual Sewage Sludge Report is currently available at the following Internet address:

http://www.epa.state.oh.us/dsw/sludge/annual_report.html

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: Joseph Ulrich, Superintendent

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