



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 6, 2009

RE: WAYNE COUNTY
CITY OF RITTMAN
SEWAGE SLUDGE INSPECTION

Mr. Larry Boggs, City Manager
30 North Main Street
Rittman, Ohio 44270

Dear Mr. Boggs:

On December 9, 2008, 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 Rittman wastewater treatment plant (WWTP). The undersigned was accompanied by Laura Weber, Ohio EPA. Mr. Cary Metcalf, Utilities Director, and Mr. Ken Mann, Utilities Supervisor, 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 the compliance checklist, a review of the WWTP's sewage sludge records, and a walk through of the WWTP sewage sludge units.

The WWTP currently treats approximately 0.8 million gallons of wastewater per day. Sewage sludge treatment consists of two aerobic digesters (each with a capacity of approximately 192,000 gallons), one sludge holding tank that has had diffusers installed to potentially serve as a third aerobic digester (a capacity of approximately 377,000 gallons), and one belt filter press. During a March 28, 2006 sewage sludge inspection, Mr. Metcalf previously stated that the on-site sewage sludge storage capacity (days) was 120 days. The WWTP generates a Class B sewage sludge via satisfying pathogen reduction (PR) alternative 1, geometric mean of seven fecal coliform samples, and vector attraction reduction option 4, specific oxygen uptake rate.

The sewage sludge inspection documented that although the results of each individual sewage sludge fecal coliform sample were maintained, the geometric mean of seven fecal coliform samples was not being calculated to verify compliance with OAC 3745-40-05(O)(1). In addition, according to the fecal coliform records provided for January 8, 2008, February 8, 2008, and May 9, 2008, only four fecal coliform samples (i.e. a one milliliter [ml], a two ml, a ten ml, and a twenty ml) were collected and analyzed. During the sewage sludge inspection, Mr. Mann calculated the geometric mean for the four May 9, 2008 fecal coliform samples. According to U.S. EPA's Environmental Regulations and Technology document entitled "**Control of Pathogens and Vector Attraction in Sewage Sludge**," "...seven samples of treated sewage sludge (biosolids) be collected and that the geometric mean fecal coliform density of these samples be less than 2 million CFU or MPN per gram of biosolids (dry weight basis)." "...Use of at least seven samples is expected to reduce the standard error to a reasonable value."

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“...The seven samples should be taken over a 2-week period in order to represent the performance of the facility under a range of conditions.” **The WWTP must immediately begin collecting seven sewage sludge samples for fecal coliform analysis and begin calculating the geometric mean.**

The WWTP was unable to provide the agronomic rate calculations for the authorized Class B sewage sludge sites where the WWTP's sewage sludge applications are occurring. On December 30, 2008, Ohio EPA provided the agronomic rate calculation worksheet to Mr. Stuart Newcomber via e-mail. For your convenience, pages 83 to 87 of Ohio EPA's "**DSW Policy 0100.028**" manual also detail how to calculate the agronomic rate. Ohio EPA's "DSW Policy 0100.028" manual can be located at the following Internet address under the category entitled "Rules and Regulations":

<http://www.epa.state.oh.us/dsw/sludge/biosolid.html>

Ohio EPA recommends that the WWTP begin obtaining copies of the agronomic rate calculations being performed by Mr. Newcomber in order to verify that OAC Rule 3745-40-04(D) is being satisfied.

Mr. Metcalf was unaware if the authorized Class B sewage sludge site harvesting restrictions and isolation distances were being satisfied. Mr. Metcalf committed to inquiring with the authorized Class B sewage sludge site applicator, Mr. Newcomber, if he was complying with the harvesting restrictions and isolation distance requirements established within OAC Rule 3745-40. **Information must be submitted to Ohio EPA that clarifies if the Class B sewage sludge site harvesting restrictions and isolation distances are being satisfied.**

A review of the WWTP's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period March 2006 through November 2008 indicates that the following violations of the NPDES permit at Outfall 581:

City of Rittman WWTP (3PD00047): 3/2006 – 11/2008						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2007	581	Sludge Fee Weight	2/Year	1	0	06/01/2007
December 2007	581	Sludge Fee Weight	2/Year	1	0	12/01/2007

Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to \$10,000 per day of violation. It is requested that the City submit a written response to this office documenting the actions taken or proposed to address the above violations and/or deficiencies. Your response shall include dates for initiation and completion of the actions.

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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 statement requirements established within OAC Rule 3745-40-06(I) and (J). The certification statements should be separate from all other records and on a stand alone document. Effective immediately, the WWTP must begin maintaining and submitting annually the certification statements provided within OAC Rule 3745-40-06(I) and (J).

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: Cary Metcalf

ec: Laura Weber, Ohio EPA, DSW, NEDO
Andrew Gall, Ohio EPA, DSW, NWDO
Jacob Howdysshell, Ohio EPA, DSW, CO