



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 9, 2008

RE: ASHTABULA COUNTY  
VILLAGE OF ORWELL  
SEWAGE SLUDGE INSPECTION

Mr. Lawrence Bottoms, Mayor  
Village of Orwell  
179 West Main Street  
Orwell, OH 44076

Dear Mr. Bottoms:

On June 30, 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 Orwell wastewater treatment plant (WWTP). I was accompanied by Virginia Wilson of Ohio EPA. Mr. Greg Hogue, Superintendent of Utilities, 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 units.

The WWTP currently treats approximately 0.223 million gallons of wastewater per day. Sewage sludge is treated within one aerobic digester that consists of two cells sized at 45,000 gallons each, and one 780,000 gallon sewage sludge lagoon. Prior to sampling the sewage sludge within the lagoon, the lagoon is mixed in order to obtain representative samples. Sewage sludge stored within the lagoon is removed every few years and land applied to one seventy acre field over a three day period.

According to the 2007 annual sewage sludge report, the WWTP is satisfying pathogen reduction (PR) alternative No. 1, geometric mean of seven fecal samples, and vector attraction reduction (VAR) option No. 9, land injection. During the inspection, Mr. Hogue stated that the WWTP is performing VAR option 1, 38% volatile solids reduction. The WWTP must clarify if both VAR options are currently being performed.

- OAC Rule 3745-40-04(D) requires that bulk sewage sludge shall be land applied at a rate that is equal to or less than the agronomic rate. No agronomic rate calculations are being performed. The WWTP must immediately begin performing agronomic rate calculations. For your convenience an agronomic rate calculation worksheet has been enclosed.
- OAC Rule 3745-40-06(E) requires that for authorized sites, the frequency of monitoring for soil pH and soil phosphorus level shall be such that the most recent results are not more than two years old at the time of bulk sewage sludge

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land application. The WWTP did not have this information and committed to contacting Gruskiewicz Farms to determine if the soil pH and soil phosphorus monitoring has occurred. If soil monitoring has been performed, the most recent results must be submitted to Ohio EPA. If soil monitoring has not been performed, the WWTP must perform soil monitoring to determine if sewage sludge can be land applied to the fields prior to land application occurring.

- OAC Rule 3745-40-04(H) requires specific signage notifying the general public that sewage sludge has been land applied. The WWTP has not been placing the appropriate signage at the entrance to the authorized sewage sludge sites. The WWTP must immediately begin placing the appropriate signage at the entrance to the authorized sewage sludge site.
- OAC Rules 3745-40-06(I) and (J) establish the record retention requirements for persons treating and land applying sewage sludge. 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 maintain and submit annually the certification statements provided within OAC Rule 3745-40-06(I) and (J). The WWTP is currently not maintaining specific records in accordance with both rules. The WWTP must immediately begin maintaining records in accordance with OAC Rules 3745-40-06(I) and (J).
- According to Ohio EPA records, the WWTP had frequency violations in November 2007 for sludge weight (reporting code 70316) and sludge solids, percent total (reporting code 70318), and sludge solids, percent volatile (reporting code 70322). The WWTP must submit information regarding why these parameters were not monitored daily, in accordance with the WWTP's NPDES permit.

For your convenience, Ohio's sewage sludge rules are available on the Internet at the following address:

[http://www.epa.state.oh.us/dsw/rules/final\\_sludge.html](http://www.epa.state.oh.us/dsw/rules/final_sludge.html)

Please be aware that Ohio EPA has recently drafted new sewage sludge rules that may affect the land application program of sewage sludge generated and treated at the WWTP. The proposed sewage sludge rules will be available for public comment in the near future and will be able to be obtained from the following Internet address:

<http://www.epa.state.oh.us/dsw/rules/drafrules.html>

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The Village of Orwell's sewage sludge disposal program was not in compliance with OAC 3745-40. Within fourteen (14) days of receiving this letter, please submit a written response as to how the Village of Orwell will address the above deficiencies. 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

Enclosures

cc: Greg Hogue, Superintendent of Utilities, Village of Orwell