



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 23, 2008

RE: STARK COUNTY
VILLAGE OF NAVARRE
SEWAGE SLUDGE INSPECTION

Mayor and Council
Village of Navarre
27 Cannal Street W
Navarre, OH 44662

Dear Village Mayor and Council:

On May 22, 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 Village of Navarre wastewater treatment plant (WWTP). Mr. Jeffrey Seward, Utilities 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 units.

The WWTP currently treats an average daily flow of approximately 0.709 million gallons of wastewater. Sewage sludge generated at the WWTP is treated within two (2) aerated holding tanks (83,000 gallons and 80,000 gallon), a belt press, two (2) sand drying beds, and a sewage sludge storage pad. Pathogen reduction alternative one, geometric mean of seven fecal samples, and vector attraction reduction alternative ten, immediate incorporation, is performed.

During the inspection, Mr. Seward stated that sewage sludge is land applied weekly, weather permitting, to authorized sewage sludge sites. No agricultural crops are grown on the authorized sewage sludge sites. Mr. Seward stated that a wildlife seed mix is planted annually on the authorized sewage sludge sites that consist of alfalfa, clover, chickaree, and turnips. Mr. Seward also stated that the no harvesting occurs and that wildlife (i.e. deer and turkeys) may consume the vegetation.

OAC Rule 3745-40-01(A)(76) defines surface disposal as "the placement of sludge on an area of land for disposal including, but not limited to, monofills, surface impoundments, lagoons, waste piles, or dedicated disposal sites." OAC Rule 3745-40-04(D) requires bulk sewage sludge to be land applied at a rate that is equal to or less than the agronomic rate.

The WWTP appears to be performing surface disposal, which is prohibited in accordance with OAC Rule 3745-40-07(D), for the following reasons:

1. No harvesting of agricultural crops is occurring, which is resulting in the annual accumulation of nutrients. The excess nutrients (i.e. released from the crop residuals and weekly sewage sludge applications) will ultimately result in the exportation of excess nutrients into "waters of the state";
2. OAC Rule 3745-40-04(D) requires sewage sludge to be land applied at a rate that is equal to or less than the agronomic. The agronomic rate calculation is not currently being performed by the WWTP; and
3. An agronomic rate cannot be calculated for clover, as clover actually fixes nitrogen into the ground (i.e. increases availability).

As a result of the above, the WWTP must immediately cease the land application of sewage sludge to the authorized sewage sludge sites where the wildlife seed mix has been planted. The WWTP must begin managing its generated sewage sludge in accordance with one of the following methods:

- Land apply sewage sludge, in accordance with the agronomic rate calculation for the specific field, to other authorized sewage sludge sites that have been authorized for sewage sludge land application and are utilized for growing harvestable crops;
- If the WWTP does not have any other authorized sewage sludge sites for land application, the WWTP must locate additional fields where land application can occur and submit the sewage sludge site authorization packet for the proposed field. For your convenience, I have enclosed a copy of the sewage sludge land application packet. Additional copies of the sewage sludge application packet can be located at the following Internet site;

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

- Transfer the sewage sludge to another NPDES permitted WWTP for treatment and disposal; or
- Hauling to and disposing of the sewage sludge within a licensed landfill that has been authorized to accept such waste material.

According to Ohio EPA's records, the WWTP failed to perform monitoring in June 2007 for the parameters established within Station 581 of the NPDES permit. According to the 2007 Annual Sewage Sludge Report, the parameters "...were inadvertently not done by Alloway Labs despite the necessary paperwork being filled out requesting the tests."

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The Village of Navarre's sewage sludge disposal program appeared to not be in compliance with OAC 3745-40. 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: Jeffrey Seward

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