



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 26, 2008

RE: MEDINA COUNTY  
CITY OF WADSWORTH  
SEWAGE SLUDGE INSPECTION

Ms. Robin L. Laubaugh, Mayor  
City of Wadsworth  
120 Maple Street  
Wadsworth, Ohio 44281

The Honorable Mayor Laubaugh:

On October 27, 2008, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) Rule 3745-40, Ohio's sewage sludge rules, at the City of Wadsworth's wastewater treatment plant (WWTP). The undersigned was accompanied by Mr. Chuck Allen, Mr. Dave Stroud, and Mr. Scott Winkler of Ohio EPA's Division of Surface Water. Mr. Donald Berlin, Superintendent, and Mr. Mike Lucas, Chief Operator, 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 a compliance checklist, a review of the WWTP's sewage sludge records, and a walk through of the WWTP's sewage sludge treatment units.

### **Sewage Sludge Management**

The construction of WWTP upgrades was completed in September 2008. The WWTP currently treats approximately 2.7 million gallons of wastewater per day. Generated sewage sludge is treated within four anaerobic digesters, one gravity belt thickener, one belt filter press, and one sewage sludge storage building. The primary anaerobic digester (PAD) is sized for 425,000 gallons and is heated to a temperature range of approximately 92°F to 95°F. The remaining three anaerobic digesters are each sized to a capacity of 200,000 gallons. Primary sewage sludge and the waste activated sewage sludge are pumped into blended sludge tank No.1, which is pumped to the PAD, then pumped to the secondary anaerobic digesters, and finally pumped to the blended sludge tank No. 2 prior to dewatering on the belt filter press.

The sewage sludge storage capacity (days) at the WWTP is approximately one million gallons. OAC Rule 3745-40-04(T) requires that "facility storage of sewage sludge shall consist of one hundred twenty days sewage sludge storage for the design capacity of the treatment works. Facility storage of sewage sludge may consist of any combination of additional volume in sludge stabilization units (digesters), separate tanks, sewage sludge treatment lagoons, drying beds, dewatered sewage sludge storage pad areas, or other means to store either liquid or dewatered sewage sludge. In lieu of some of the one hundred twenty day facility storage of sewage sludge requirement, a permittee may

demonstrate to the director that they have engineered or contracted alternatives to facility storage of sewage sludge in place.” The on-site sewage sludge storage capacity of sewage sludge, in days, was unknown at the time of the inspection. **Information must be submitted to Ohio EPA that documents the on-site sewage sludge storage capacity, in days, that is available at the WWTP.**

According to the 2007 annual sewage sludge report, the WWTP was generating a Class B sewage sludge by satisfying pathogen reduction (PR) alternative 3, anaerobic digestion, and vector attraction reduction (VAR) alternative 1, thirty-eight percent (38%) volatile solids reduction. At the time of the inspection, it was unknown how the WWTP would satisfy the PR and VAR requirements established within OAC Rule 3745. **Effective immediately, the land application of sewage sludge is prohibited until the WWTP can verify that the treated sewage sludge satisfies the Class B requirements established within OAC Rule 3745-40. The WWTP must submit information to Ohio EPA that details how the PR and VAR requirements will be satisfied.**

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, which is defined as “the whole sewage sludge application rate (dry weight basis) intended to provide the food crop, feed crop, fiber crop, cover crop, pasture, or vegetation the appropriate nitrogen for the reasonably expected yield, and to minimize the amount of nitrogen in the sewage sludge that passes to waters of the state.” **The WWTP must provide the most recent agronomic calculation that was utilized for determining how much sewage sludge was to be land applied to an authorized sewage sludge site.**

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

Station No.	Date	Reporting Code	Parameter	Reporting Frequency
581	09/01/2007	70316	Sludge Weight	1/Quarter
581	09/01/2007	51129	Sludge Fee Weight	1/Quarter
581	03/01/2008	70316	Sludge Weight	1/Quarter
581	06/01/2008	51129	Sludge Fee Weight	1/Quarter
581	09/01/2008	51129	Sludge Fee Weight	1/Quarter

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

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### **Storm Water Management**

In reviewing the WWTP's storm water management, the following deficiencies must be addressed:

- The WWTP's garage has floor drains installed. If the floor drains are connected to the storm sewer system, they must be either connected to a sanitary sewer or removed;
- Many 55-gallon drums have been stored in an uncovered and uncontained area. Spill containment and a cover must be added around the area where 55-gallon drums are to be stored. Ohio EPA recommends relocating the empty 55-gallon drums to an area of the WWTP's garage until proper disposal occurs.

The City of Wadsworth's sewage sludge disposal program did not appear to be in compliance with OAC 3745-40. In addition, storm water management at the WWTP requires improvement. The WWTP must submit a written response to Ohio EPA that details the corrective actions that will be taken to address the deficiencies detailed above. 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: Donald Berlin, WWTP Superintendent

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