



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 22, 2010

RE: LORAIN COUNTY
WELLINGTON WWTP
SEWAGE SLUDGE INSPECTION

Ms. Barbara O'Keefe, Mayor
115 Willard Memorial Square
Wellington, Ohio 44090

Dear Mayor O'Keefe:

On March 11, 2010, 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 Wellington wastewater treatment plant (WWTP), NPDES permit No. 3PC00014*FD. Mark Rosemark, Water and Wastewater Superintendent, and Gregory Frenk, 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 an evaluation of the WWTP sewage sludge units.

The WWTP currently treats approximately 500,000 gallons of wastewater per day. Sewage sludge is treated within two aerobic digesters, two sewage sludge storage lagoons, and one sewage sludge drying bed. The WWTP has approximately one year of onsite sewage sludge storage capacity. A class B sewage sludge is currently generated by the WWTP via satisfying pathogen reduction alternative No. 1, geometric mean of seven fecal coliform samples and vector attraction reduction option No. 1, 38% volatile solids reduction.

While significant improvement has occurred to the WWTP's treatment and management of sewage sludge, the following items must be addressed:

- OAC rule 3745-40-04(E) requires the WWTP to provide a label or information sheet to all persons who receive bulk sewage sludge from the WWTP; all persons who land apply bulk sewage sludge received from the WWTP; and the owner or lease holder of the land upon which the bulk sewage sludge is land applied. The label or information sheet must include the following:
 - A. The name, address, telephone number, and NPDES permit number of the permittee;

- B. A statement that the material is or contains a by-product of wastewater treatment;
 - C. A statement that the Ohio EPA, division of surface water, may be contacted at 1-877-644-2001;
 - D. The concentration of total Kjeldahl nitrogen, ammonia nitrogen, total phosphorus, and total potassium of the sewage sludge in milligrams per kilogram (dry weight basis);
 - E. The concentration of total Kjeldahl nitrogen, available phosphorus, and soluble potassium of the sewage sludge as a "grade"; and
 - F. When applicable for a liming material, the effective neutralizing power, fineness index, and standard of fineness of the sewage sludge.
- OAC rule 3745-40-06(I) requires the WWTP to maintain the following signed certification statements to be maintained:

"I certify, under penalty of law, that the information that will be used to determine compliance with class B pathogen reduction alternative (insert one of the class B alternatives in paragraphs (O)(1) to (O)(3) of rule 3745-40-05 of the Administrative Code) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."; and

"I certify, under penalty of law, that the information that will be used to determine compliance with vector attraction reduction requirement (insert one of the vector attraction reduction requirements in paragraphs (Q)(1) to (Q)(8) of rule 3745-40-05 of the Administrative Code) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

- OAC rule 3745-40-06 (J) requires the person who land applies bulk sewage sludge to maintain specific records for five years that include the agronomic rate calculations used to determine the bulk sewage sludge loading rate in dry tons per acre for each site on which bulk sewage sludge is applied. The WWTP did not have copies of these records available. Ohio EPA requested the WWTP to contact the person who performed land application of the generated sewage sludge to obtain copies of the agronomic rate calculations that were utilized.

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Wellington WWTP
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- A review of the discharge monitoring reports indicates that the WWTP did not perform monitoring for the following parameters in accordance with the NPDES permit:

Parameter	Reporting Code	Station	Monitoring Frequency	Month of Occurrence
Sludge Solids, Percent	70318	581	1/Month	01/01/2008
Sludge Solids, Percent	70322	581	1/Month	01/01/2008
Sludge Solids, Percent	70318	581	1/Month	02/01/2008
Sludge Solids, Percent	70322	581	1/Month	02/01/2008

Copies of the label or information sheet, certification statements, and agronomic calculations must be submitted to Ohio EPA for review by February 28, 2010. Ohio EPA is requesting copies of the above records from January 1, 2008. In addition, the WWTP must clarify why the above monitoring requirements were not satisfied. 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

pc: Mark Rosemark, Water and Wastewater
Gregory Frenk, Water and Wastewater

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

3-11-10

Mr. Chris Moody
Environmental Specialist
Division of Surface Water
OEPA- NEDO

Mr. Moody:

Following your visit to the Wellington Wastewater Plant today, I located the attached copy of an original response letter prepared on the date indicated on the letter, addressing the elements of a report sent to our Mayor, the report from your office, dated Aug. 8, 2007.

You will note that this copy is signed and dated with today's date, only to certify to you that the letter was prepared and sent , along with the materials mentioned in the letter, at the time the original response was prepared, Aug. 28, 2007.

I do not see a specific response to your item (Page 5, par.(6)), where you noted the need for a certification of the vector attraction reduction information. I would like to certify, with this letter, that all information associated with the requirements of rule 3745-40-05, paragraph (Q)(1), were met with the removal of sludge in Aug. of 2008, and that qualified personnel properly gathered and evaluated this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

I will respond to all items discussed today in as timely a manner as possible, including all pertinent information associated with sludge removed in March, 2010.

Respectfully,



Mark G. Rosemark
Supt., Water/Wastewater
Village of Wellington

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August 28, 2007

Mr. Chris Moody
Environmental Specialist
Division of Surface Water
OEPA- NEDO

Mr. Moody:

In my capacity as Superintendent of Water and Wastewater for the Village of Wellington, I am responding to your letter of 8-8-07, addressed to Mayor O'Keefe. On the following sheets you will find an item specific response to that letter, in which you reviewed the Sludge Program inspection conducted at the Wellington Wastewater Plant on August 6.

I would like to preface my remarks by stating that Mr. Greg Frenk, my chief operator at that facility, was not in his current position until July of 2006. Any responsibility for shortcomings noted in your report lies squarely on my shoulders. Mr. Frenk has done a commendable job during the past year in his performance as chief operator.

Sludge Response (cont'd.)

In response to your letter of 8-8-07, I would like to address the items of concern.

1. We have already contacted our contract lab for the appropriate fecal coli. sampling kits. Samples for the Fecal reduction analyses were submitted to the lab on Aug. 27, 2007. We hope to demonstrate compliance with Class B Pathogen Reduction rules.
2. There will be no application of sludge this year until we have satisfied the criteria mentioned above.
3. In the last five years, we have removed sludge for disposal only twice – 2003 and 2005. We will complete all monitoring as called for in OAC Rule 3745-40-06(E) prior to any application in this Fall, 2007 (still within the two year parameter). Attached you will find all analyses done in conjunction with those two previous rounds of sludge application.
4. A. With this response you will find a copy of a letter from Mr. Thomas Abraham, of Agri-Sludge, Inc., the company performing the past and expected future land applications. In the letter he states that signage was done at the time of the previous app's., and that required signage will be placed at the time of any future applications. The Village of Wellington will see that all signage regulations are followed.
B. In his letter, Mr. Abraham also stated that isolation distances were maintained.
C. Again, Mr. Abraham indicates that our sludge was applied to wheat stubble ground, insuring that harvest would not follow sooner than the proscribed thirty days, per OAC 3745-40-05(P).
D. This WWTP will insure that all elements of OAC 3745-40-04(E), 1-6, are followed in all future sludge applications.
5. Re: OAC 3745-40-06(I),1-6, I am enclosing with this mailing copies of the sludge application reports for 2003 and 2005, with field reports based on the sludge analyses performed by our contract lab at that time. I am also attaching copies of our 2003, 2004, and 2006 Annual Sludge Reports. At the time of this writing, I was not able to locate the 2005 report, but feel that it is misplaced. The WWTP intends to comply with all pertinent elements of this section of the sludge rule.

6. The earthen retaining mound around the drying beds is to be rebuilt by plant staff. This should be completed within two weeks of this writing.
7. The additional reporting forms way well be included in the upcoming permit. However, to date, we have not received our draft copy.
8. It is our intention to utilize a contract hauler/applicator at least every two years, as needed, for the removal/disposal of accumulated sludge. All required records will be kept on-site at the WWTP.

It is my sincere intention to correct any shortcomings with the reporting and documentation of all activities related to our sludge program. Attention will be paid to all aspects of the OAC requirements in this area.

Yours Truly,


Mark G. Rosemark
Supt., Water/Wastewater
Village of Wellington

3/11/10 copy

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MAR 15 2010

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