



**Environmental
Protection Agency**

**John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director**

Re: Crawford County
City of Bucyrus WWTP
Sludge Correspondence

February 4, 2011

Mr. Terry Spiegel, Superintendent
City of Bucyrus WWTP
500 South Sandusky Avenue
Bucyrus, Ohio 44820

Dear Mr. Speigel:

On January 13, 2011, Andrew Gall and Michelle Sharp conducted an inspection at the City of Bucyrus Wastewater Treatment Plant. You and Tim Wood were present and provided information on sludge operations and record keeping. The inspection included a walk through the plant, a review of the sewage sludge records in order to determine compliance with the Ohio Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC).

The sewage sludge is aerobically digested and dewatered using a belt press and then sent to the RDP EnVessel Pasteurization system for additional treatment to meet Class A EQ Pathogen Reduction Alternative 5, PFRP number seven, pasteurization requirements. The temperature of the sewage sludge is to be maintained at seventy degrees Celsius or higher for thirty minutes or longer. The detention time and temperature of the sewage sludge is monitored as it moves through the EnVessel Pasteurization vessel and the results recorded on the operators daily log sheet.

Vector Attraction Reduction (VAR) is achieved by either meeting option number one and/or six. The primary alternative is option one; the 38% reduction of volatile solids is tracked using the sludge daily lab bench sheet and then compiled into monthly reports. When option six, high PH, is used to meet the VAR requirements, a log book in the lab is maintained to document that the pH of the sewage sludge was maintained at or above 12 for two hours and at or above 11.5 for twenty-two hours.

On April 26, 2010, Ohio EPA received some guidance from U.S. EPA regarding temperature verification for facilities that utilize pasteurization vessels. According to U.S. EPA, temperature verification should be demonstrated by facilities that utilize pasteurization vessels to generate an exceptional quality sewage sludge as accurate temperature monitoring is essential to assure process effectiveness. Demonstrating that process conditions are within appropriate operating ranges is essential to verify that disinfection has been achieved.

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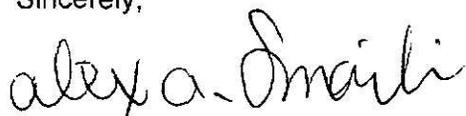
In light of U.S. EPA's guidance, Ohio EPA is requesting the Bucyrus wastewater treatment plant, NPDES permit No. 2PD00021*KD, to provide information that details how often the thermocouples located within the pasteurization vessel are calibrated. In addition, a copy of the last calibration performed on the thermocouples must be submitted to Ohio EPA for review. If a calibration has not been performed recently, the City should have the thermocouples calibrated and submit the results to Ohio EPA within three months of the date on this letter. This information will be utilized to verify that the pasteurization vessel is functioning correctly and satisfying the pathogen reduction requirements established within OAC Rule 3745-40-05.

It was indicated that the computer log to track which farmers receive the Class A EQ sewage sludge as well as the amount of material received by each farmer was no longer being utilized. This information will need to be tracked because the new version of Ohio's Sewage Sludge Rules which are effective July 1, 2011, have specific requirements that apply when greater than 300 tons of sewage sludge is beneficially used at a site.

The sludge drying beds are no longer utilized for drying sewage sludge. Currently they are used to dewater and dry the grit and trash from the sewer cleaning vac truck. You indicated that the dewatered material is then hauled to the landfill for disposal. At the time of our inspection there was a large amount of material stockpiled on one of the beds. Please make sure that this material is being removed and hauled to the landfill for proper disposal on a regular basis.

If you have questions regarding the sewage sludge program or this inspection letter, please refer to Ohio EPA's Sewage Sludge Rules in Chapter 3745-40 of the OAC which can be found on the Ohio EPA website at (http://www.epa.state.oh.us/dsw/rules/3745_40.aspx), or call Mr. Andrew Gall at (419) 373-3003 or via email at andrew.gall@epa.state.oh.us.

Sincerely,



Alex A. Smaili, P.E.
Water Quality Engineer II / Unit Supervisor
Division of Surface Water

AYG/cs

Enclosures

pc: City of Bucyrus Safety Service Director
~~DSW, NWDO File w/enclosure~~
ec: Michelle Sharp, DSW, NWDO
Chris Moody, DSW, NEDO
Jacob Howdyshell, DSW, CO
Alex Smaili, DSW, NWDO