



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Fulton County
Delta WWTP
Sludge Correspondence

February 12, 2009

Mr. Derek Allen, Administrator
Village of Delta
401 Main St.
Delta, Ohio 43515

Dear Mr. Allen:

On January 26, 2009, Ohio EPA representatives Andrew Gall and Justin Williams conducted an inspection at the Village of Delta Wastewater Treatment Plant (WWTP) to determine compliance with the Ohio Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. Larry Born and Mr. Scot Johnston were present and provided information on the sewage sludge operations and records. The sewage sludge inspection consisted of the completion of the enclosed compliance checklist, a review of the sewage sludge records, and a walk through of the plant. The sewage sludge inspection revealed the following:

- **The Village is in violation of its National Pollutant Discharge Elimination System (NPDES) permit by failing to monitor the sewage for the pollutants in accordance with the requirements established in OAC 3745-40-05(F) and reporting the results on the 581 station of the December 2008 Discharge Monitoring Report (DMR).**
- At the time of the inspection sewage sludge records were not available for review at the WWTP. OAC 3745-40-06(I) requires the Village to "...develop the following information, shall retain the information for five years, and shall make the information available to the division upon request:
 - (1) The concentration of each pollutant listed in paragraph (F) of rule 3745-40-05 of the Administrative Code;
 - (2) A description of how the pathogen reduction requirements of rule 3745-40-05 of the Administrative Code are met;
 - (3) When applicable, a description of how the vector attraction reduction requirements in paragraphs (Q)(1) to (Q)(8) of rule 3745-40-05 of the Administrative Code are met;

- (4) The results of all analyses required by paragraphs (A), (B), (C), (D), (F), and (G) of this rule; and
- (5) The following certification statement signed by the permittee: "I certify, under penalty of law, that the information that will be used to determine compliance with class (insert A or B) pathogen reduction alternative (insert one of the class A alternatives in paragraphs (N)(1) to (N)(6) of rule 3745-40-05 of the Administrative Code or 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
- (6) When applicable, the following certification statement signed by the permittee: "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."

Mr. Born indicated that the records were at the drinking water treatment plant. Copies of the sample results for fecal coliform, total solids and the 2008 land application spreadsheets were submitted to Mr. Gall on January 27, 2009. **The Village should immediately start keeping the records necessary to comply with OAC 3745-40-06(I) at the WWTP so that they are available during future Ohio EPA inspections.**

- Copies of sample results to show compliance with pathogen reduction requirements were submitted with the Annual Sludge Report. A review of this data appears to indicate that the requirements of Class B Pathogen Reduction Option B1 were met. However, copies of these records also need to be maintained and available at the WWTP.
- During the inspection it was indicated that the Village's sludge hauling contract with Randy Mastin has expired and that the Village is in the process of rebidding the sludge hauling contract. We recommend that the Village not delay this process in order to minimize the period of time you do not have a contractor. **The Village should also make sure that the new contractor is able to meet the land application contractor certification requirements established in OAC 3745-40-06(J).**

Within 30 days of receiving this letter please submit a written response as to how the above noted concerns will be addressed. Please submit this information to Mr. Gall's attention at: Ohio EPA, Northwest District Office, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402. A copy of our inspection checklist has been included for your review. A copy of Ohio's Sewage Sludge Rules OAC 3475-40, can be found on the internet at

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(<http://www.epa.state.oh.us/dsw/sludge/biosolid.html>). If you have any questions regarding the sewage sludge inspection or this letter, please contact Mr. 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

Enclosures

AG/lb

pc: ~~D:\DSW\NWDO\file w\enclosure~~

ec: Chris Moody, Ohio EPA, DSW, NEDO
Jacob Howdyshell, Ohio EPA, DSW, CO
Justin Williams, Ohio EPA/NWDO
Ryan Gierhart, Ohio EPA/NWDO