

**Environmental  
Protection Agency**

James P. Costello, Governor  
Randy Fisher, Lt. Governor  
John J. Whelan, Director

July 29, 2011

RE: PORTAGE COUNTY  
STREETSBORO HUDSON REGIONAL WWTP  
NPDES PERMIT NO. OH0090131  
OHIO EPA PERMIT NO. 3PK00014\*GD  
SEWAGE SLUDGE INSPECTION

Portage County Commissioners  
449 South Meridian Street  
7th Floor Portage County Administration Building  
Ravenna, Ohio 44266

Dear Commissioners:

On June 28, 2011, 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 Wilkshire Hills wastewater treatment plant (WWTP). The facility was represented by Wayne Carkido, Jim Akerly, and Cindy Hazlett, who 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 sewage sludge records, and an evaluation of the sewage sludge treatment units.

WWTP information

The WWTP has a design treatment capacity of 4.0 million gallons of wastewater per day (MGD) and currently treats approximately 2.9 to 3.0 MGD. Sewage sludge is treated within two aerobic digesters (each with a capacity of approximately 250,000 gallons), three holding tanks (each with a capacity of approximately 250,000 gallons), one belt filter press, and four covered concrete storage pads. A second belt press was removed in order to provide room for the installation of a new centrifuge, in accordance with the sludge handling and treatment improvements detailed within Ohio EPA's permit-to-install (PTI) No. 710612, issued June 22, 2009. Two of the covered concrete storage pads are to be eventually removed for the purpose of constructing a sewage sludge dryer building.

The WWTP currently generates a Class B biosolids via satisfying pathogen reduction alternative P1, geometric mean of seven fecal coliform samples, and vector attraction reduction option VAR-3, bench scale aerobic digestion. In accordance with PTI No. 710612, the WWTP expects to generate an exceptional quality biosolids via satisfying pathogen reduction alternatives P-8, time and temperature regime, and P-11, heat drying, and vector attraction reduction option VAR-8, greater than or equal to ninety percent solids. According to a telephone conversation with Mr. Carkido on July 28, 2011, you approved the proposal for PTI No. 710612 on July 26, 2011. The bid process is scheduled to commence July 31, 2011, with construction expected to be initiated November 2011.

Onsite sewage sludge storage capacity currently exceeds one year. The WWTP also has the ability to transport sewage sludge by Turos, Inc. to the Countywide Recycling & Disposal Facility (CID: 38390), located in East Sparta, Stark County, Ohio.

Sewage Sludge Inspection

The WWTP appears to be maintaining appropriate records that document compliance with OAC rule 3745-40.

The sewage sludge inspection documented the following items occurring at the WWTP that require corrective actions to be initiated:

**I. Fecal Coliform Monitoring**

According to records maintained by the WWTP, Standard Method 9222 D is performed to verify compliance with pathogen reduction alternative P1, geometric mean of seven fecal coliform samples. During the inspection, sewage sludge samples are held for up to twenty-four hours prior to being analyzed. Please be aware that a twenty-four hour hold time is not appropriate for fecal coliform. Table II of Title 40 Part 136.3(d) of the Code of Federal Regulations (CFR) establishes that the maximum hold time for fecal coliform is six hours and clarifies in note 22 that "samples analysis should begin immediately, preferably within 2 hours of collection. The maximum transport time to the laboratory is 6 hours, and samples should be processed within 2 hours of receipt at the laboratory." For your convenience, 40 CFR 136.3(d) can be located at the following website:

[http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr136\\_main\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr136_main_02.tpl)

Therefore, the WWTP must establish a new sample collection protocol that satisfies the above requirement. Ohio Administrative Code (OAC) 3745-40-09(C)(3)(c) requires a standard operating procedure (SOP) be developed for permittees that generate Class B biosolids. The SOP must also include sample collection and monitoring procedures. Please note that a similar SOP is to be required once the WWTP begins generating an exceptional quality biosolid, as established within OAC 3745-40-09(C)(1)(c).

**II. Station 586**

According to Ohio EPA records, the following frequency violation has occurred:

Parameter	Reporting Code	Expected	Received	Date of Occurrence
Sludge Fee Weight	51129	1	0	12/1/2007

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New Sewage Sludge Rules

Please be aware that Ohio EPA's new sewage sludge rules went effective July 1, 2011. Ohio EPA recommends that the WWTP review the new sewage sludge rules as they may affect the WWTP's current and future sewage sludge management programs. For your convenience, the new sewage sludge rules can be located at the following website:

[http://www.epa.ohio.gov/dsw/rules/3745\\_40.aspx](http://www.epa.ohio.gov/dsw/rules/3745_40.aspx)

Please submit a written response to my attention detailing how the above items will be addressed. Should you have any questions regarding the sewage sludge inspection, please contact me at (330) 963-1118 or via email at [chris.moody@epa.state.oh.us](mailto:chris.moody@epa.state.oh.us) at your earliest convenience.

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM:bo

pc: Wayne Carkido, Wastewater Manager

ec: Jacob Howdyshell, DSW-CO  
Andrew Gall, DSW-NWDO