

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

November 2, 2011

RE: ASHTABULA COUNTY
ANDOVER WWTP
NPDES PERMIT NO. OH0023876
OHIO EPA PERMIT NO. 3PB00000*HD
BIOSOLIDS INSPECTION

Mayor and Council
Village of Andover
134 Maple Street
Andover, Ohio 44003

Dear Mayor and Council:

On October 4, 2011, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) 3745-40, Ohio's sewage sludge rules, at the Andover wastewater treatment plant (WWTP). The Village of Andover was represented by Rich Mead, Superintendent, and Joseph DiBell, Administrator, who provided information regarding the WWTP's sewage sludge operations and records. Mr. DiBell began the position of superintendent in March 2011. 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 500,000 gallons of wastewater per day and currently treats approximately 200,000 to 300,000 gallons of wastewater per day. Mr. DiBell also provided that a three inch rainfall event equates to approximately one million gallons of wastewater per day at the WWTP due to the inflo and infiltration (I&I) of the sanitary sewers.

Sewage sludge is treated within two aerobic digesters (total capacity of 130,000 gallons each), one belt filter press, and seven sand drying beds (dimensions include three beds at 100-foot x 24-foot and four beds at 30-foot x 20-foot). Onsite sewage sludge storage capacity exceeds eighteen months.

2010 Annual Sewage Sludge Report

Ohio EPA records indicate that the WWTP did not submit a 2010 annual sewage sludge report (ASR). The WWTP must submit a 2010 ASR to Ohio EPA for review. During the inspection, Ohio EPA's website that provides the 2010 ASR was accessed. For your convenience, Ohio EPA's 2010 ASR can be obtained from the following website:

http://www.epa.ohio.gov/dsw/sludge/annual_report.aspx

Sewage Sludge Management

Class B biosolid is generated by satisfying pathogen reduction (PR) alternative P-1, geometric mean of seven fecal coliform samples, and vector attraction reduction (VAR) option VAR-10, immediate incorporation. During the inspection, Mr. DiBell stated that the WWTP ran into issues with the incorporation time frames due to the farmer not incorporating within six hours of delivery to the beneficial use site. Ohio EPA recommends that the WWTP begin evaluating VAR-1, thirty-eight per cent volatile solids reduction, to eliminate the six hour incorporation requirement. In the event that the WWTP elects to continue to utilize VAR-10, the WWTP must ensure that the six hour incorporation requirement is satisfied.

The WWTP must immediately cease the beneficial use of biosolids until a PR alternative and a VAR option have been satisfied and appropriate records are maintained that document compliance.

Records Retention

At the time of the inspection the following records were not available at the WWTP:

1. Agronomic rate calculations for a minimum of five years;
2. Appropriate certification statements for a minimum of five years; and
3. PR and VAR records for a minimum of five years.

Mr. DiBell explained that these records were not available as the former superintendent left quickly and only provided the Village of Andover three days of notice prior to vacating the position.

Reporting Violations

Ohio EPA records indicate that the following frequency violations have occurred from the period of September 1, 2008 to November 1, 2011:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
581	70322	Sludge Solids, Percent	1/Day	1	0	05/01/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/06/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/07/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/07/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/13/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/14/2009
581	70316	Sludge Weight	1/Day	1	0	05/16/2009
581	70316	Sludge Weight	1/Day	1	0	05/17/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/17/2009
581	70316	Sludge Weight	1/Day	1	0	05/19/2009
581	70316	Sludge Weight	1/Day	1	0	05/20/2009
581	70316	Sludge Weight	1/Day	1	0	05/22/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/23/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	06/04/2010
581	70316	Sludge Weight	1/Day	1	0	06/04/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/08/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/15/2010

581	70322	Sludge Solids, Percent	1/Day	1	0	06/16/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/20/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/21/2010
581	70316	Sludge Weight	1/Day	1	0	06/24/2010
581	70316	Sludge Weight	1/Day	1	0	06/25/2010
581	70316	Sludge Weight	1/Day	1	0	06/27/2010
581	70316	Sludge Weight	1/Day	1	0	05/02/2009
581	70316	Sludge Weight	1/Day	1	0	05/04/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/05/2009
581	70316	Sludge Weight	1/Day	1	0	05/08/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/10/2009
581	70316	Sludge Weight	1/Day	1	0	05/11/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/19/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/20/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/23/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/26/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/26/2009
581	70316	Sludge Weight	1/Day	1	0	06/02/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/05/2010
581	70316	Sludge Weight	1/Day	1	0	06/08/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/12/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/13/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/16/2010
581	70316	Sludge Weight	1/Day	1	0	06/21/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/26/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/28/2010
581	70316	Sludge Weight	1/Day	1	0	06/30/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	05/09/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/16/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/20/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/27/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/29/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	06/06/2010
581	70316	Sludge Weight	1/Day	1	0	06/06/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/07/2010
581	70316	Sludge Weight	1/Day	1	0	06/16/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/18/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/23/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/24/2010
581	70316	Sludge Weight	1/Day	1	0	06/26/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/27/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/27/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/28/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	05/01/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/02/2009
581	70316	Sludge Weight	1/Day	1	0	05/03/2009
581	70316	Sludge Weight	1/Day	1	0	05/07/2009

581	70316	Sludge Weight	1/Day	1	0	05/09/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/12/2009
581	70316	Sludge Weight	1/Day	1	0	05/18/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/22/2009
581	70316	Sludge Weight	1/Day	1	0	05/24/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/29/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/30/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/31/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	06/02/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/03/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/13/2010
581	70316	Sludge Weight	1/Day	1	0	06/13/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/15/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/19/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/22/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/29/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	05/03/2009
581	70316	Sludge Weight	1/Day	1	0	05/06/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/09/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/11/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/13/2009
581	70316	Sludge Weight	1/Day	1	0	05/14/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/14/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/15/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/15/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/17/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/22/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/25/2009
581	70316	Sludge Weight	1/Day	1	0	05/26/2009
581	70316	Sludge Weight	1/Day	1	0	05/27/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/27/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/28/2009
581	70316	Sludge Weight	1/Day	1	0	05/29/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/31/2009
581	70316	Sludge Weight	1/Day	1	0	06/03/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/04/2010
581	70316	Sludge Weight	1/Day	1	0	06/05/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/10/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/11/2010
581	70316	Sludge Weight	1/Day	1	0	06/11/2010
581	70316	Sludge Weight	1/Day	1	0	06/12/2010
581	70316	Sludge Weight	1/Day	1	0	06/17/2010
581	70316	Sludge Weight	1/Day	1	0	06/18/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/22/2010
581	70316	Sludge Weight	1/Day	1	0	06/23/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/23/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/25/2010

581	70316	Sludge Weight	1/Day	1	0	05/01/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/06/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/08/2009
581	70316	Sludge Weight	1/Day	1	0	05/10/2009
581	70316	Sludge Weight	1/Day	1	0	05/12/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/12/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/16/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/24/2009
581	70316	Sludge Weight	1/Day	1	0	05/25/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/30/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	06/01/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/03/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/07/2010
581	70316	Sludge Weight	1/Day	1	0	06/09/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/10/2010
581	70316	Sludge Weight	1/Day	1	0	06/15/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/17/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/17/2010
581	70316	Sludge Weight	1/Day	1	0	06/19/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/19/2010
581	70316	Sludge Weight	1/Day	1	0	06/22/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/25/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/29/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/30/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	05/02/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/04/2009
581	70316	Sludge Weight	1/Day	1	0	05/05/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/10/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/18/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/18/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/19/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/24/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/25/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/28/2009
581	70316	Sludge Weight	1/Day	1	0	05/30/2009
581	70316	Sludge Weight	1/Day	1	0	06/01/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/02/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/05/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/06/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/08/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/09/2010
581	70316	Sludge Weight	1/Day	1	0	06/10/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/11/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/18/2010
581	70316	Sludge Weight	1/Day	1	0	06/20/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/20/2010
581	70322	Sludge Solids, Percent	1/Day	1	0	06/21/2010

581	70322	Sludge Solids, Percent	1/Day	1	0	06/24/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/26/2010
581	70316	Sludge Weight	1/Day	1	0	06/28/2010
581	70316	Sludge Weight	1/Day	1	0	06/29/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	05/03/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/04/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/05/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	05/08/2009
581	70322	Sludge Solids, Percent	1/Day	1	0	05/11/2009
581	70316	Sludge Weight	1/Day	1	0	05/13/2009
581	70316	Sludge Weight	1/Day	1	0	05/15/2009
581	70316	Sludge Weight	1/Day	1	0	05/23/2009
581	70316	Sludge Weight	1/Day	1	0	05/28/2009
581	70316	Sludge Weight	1/Day	1	0	05/31/2009
581	70318	Sludge Solids, Percent	1/Day	1	0	06/01/2010
581	70316	Sludge Weight	1/Day	1	0	06/07/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/09/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/12/2010
581	70318	Sludge Solids, Percent	1/Day	1	0	06/30/2010

Additional Information

Ohio EPA adopted new sewage sludge regulations that became effective July 1, 2011. The WWTP must also develop and maintain the following information:

1. A standard operating procedure (SOP) that details how the pathogen reduction alternative and vector attraction reduction option are achieved. In addition, the SOP must also include:
 - i. Sample collection or monitoring locations;
 - ii. The frequency at which sample collection or monitoring is to occur;
 - iii. Sample collection or monitoring procedures;
 - iv. Sample storage and preservation procedures; and
 - v. Sample or monitoring analysis procedures, including any calculations required for sample or monitoring analysis;
2. Forecast or actual precipitation records; and
3. Soil pH and phosphorus records that are not more than three years old.

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 sewage sludge management program. For your convenience, the new sewage sludge rules can be located from the Division of Surface Water's biosolids/sewage sludge program website:

<http://www.epa.ohio.gov/dsw/sludge/biosolid.aspx>

Beneficial Use Sites

During the inspection, Mr. Mead requested a list of beneficial use sites that have been authorized to the WWTP. According to Ohio EPA, the following beneficial use sites have been authorized to the WWTP:

OEPA Site ID	External Field ID	County	Acres	Latitude	Longitude
04-00080	Bob Clifford 2	Ashtabula	20.15	41.69641	-80.5643
04-00086	Jack Doherty 1	Ashtabula	22.44	41.66259	-80.5731
04-00085	Dave Bogardus 1	Ashtabula	23.89	41.67485	-80.574
04-00084	Bob Clifford 6	Ashtabula	5.17	41.69342	-80.559
04-00083	Bob Clifford 5	Ashtabula	7.83	41.69431	-80.5581
04-00082	Bob Clifford 4	Ashtabula	6.25	41.69579	-80.5565
04-00074	Waris-3	Ashtabula	13.75	41.5297	-80.625
04-00079	Bob Clifford 1	Ashtabula	29.97	41.69447	-80.5679
04-00087	Jack Doherty 2	Ashtabula	15.67	41.6641	-80.5768
04-00081	Bob Clifford 3	Ashtabula	5.47	41.69637	-80.5584
04-00072	Waris-1	Ashtabula	49.01	41.53558	-80.6267
04-00073	Waris-2	Ashtabula	10.58	41.53835	-80.6245

In addition, the following Ohio EPA website provides a map that will detail the locations of the authorized beneficial use sites in the State of Ohio. In the upper left corner of the webpage, select "Ashtabula" from the list of counties and the authorized beneficial use sites will be depicted on the map. You can then utilize zoom in and out and switch to satellite and terrain views if necessary.

<http://wwwapp.epa.ohio.gov/dsw/gis/sludge/index.php>

Overall, the WWTP does not appear to be in compliance with OAC rule 3745-40. Within thirty (30) days of receiving this correspondence, a written report must be submitted to my attention detailing how the above items are to be addressed. Should you have any questions regarding the sewage sludge inspection, please contact me at (330) 963-1118 or via e-mail at chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/cs

cc: Rich Mead, Superintendent, Village of Andover