



**Environmental
Protection Agency**

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

March 30, 2011

RE: JEFFERSON COUNTY
BARBERS HOLLOW "M" WWTP
NPDES PERMIT NO. OH0025895
OHIO EPA PERMIT NO. OPH00000*HD
SEWAGE SLUDGE INSPECTION

Jefferson County Board of Commissioners
596 State Route 43
P.O. Box 2579
Wintersville, OH 43953

Dear Mr. Commissioners:

On March 22, 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 Barbers Hollow "M" wastewater treatment plant (WWTP). The facility was represented by Walter Kubat, General Foreman, of the Jefferson County Water and Sewer District 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 the WWTP's sewage sludge records, and an evaluation of the sewage sludge treatment units.

Sewage Sludge Management

The WWTP currently treats approximately 550,000 to 600,000 gallons of wastewater per day. The design treatment capacity of the WWTP is 400,000 gallons of wastewater per day. Sewage sludge is treated within one aerobic digester (capacity of 90,000 gallons) and six drying beds (dimensions of twenty feet by thirty-seven feet by one foot). The WWTP has approximately ninety days of onsite sewage sludge storage capacity.

The sewage sludge inspection documented the following violation occurring at the WWTP:

I. Station 581

According to Ohio EPA records, the following frequency violations have occurred:

Parameter	Reporting Code	Reporting Frequency	Date of Occurrence
Sludge Solids, Percent	70322	1/Month	09/01/2006
Sludge Weight	70316	1/Month	09/01/2007

Information must be submitted to Ohio EPA that details why the above frequency violations have occurred.

II. Pathogen Reduction (PR)

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

OAC rule 3745-40-05(O) requires that seven representative samples of the sewage sludge that is used or disposed shall be collected and the geometric mean of the density of fecal coliform in the samples shall be less than either two million MPN per gram of total solids (dry weight basis) or two million colony forming units per gram of total solids (dry weight basis).

The geometric mean of seven fecal coliform samples is not being calculated despite seven fecal coliform samples being analyzed. The WWTP must begin calculating the geometric mean of seven fecal coliform samples.

Ohio EPA has developed a spreadsheet that can be utilized to calculate the geometric mean of seven fecal coliform samples. For your convenience, the spreadsheet can be located under the "compliance assistance tools" section at the following website:

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

During the sewage sludge inspection, the following items were also discussed:

Vector Attraction Reduction (VAR)

OAC rule 3745-40-05(Q)(4) requires that the specific oxygen uptake rate (SOUR) for sewage sludge treated in an aerobic process shall be equal to or less than 1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at a temperature of twenty degrees Celsius.

The WWTP utilizes MASI Environmental Laboratories for the SOUR analysis and maintains the SOUR results. The WWTP must confirm with MASI Environmental Laboratories if the SOUR result is being corrected, if applicable, to twenty degree Celsius (20°C).

For your convenience, U.S. EPA's guidance document entitled *Environmental Regulations and Technology Control of Pathogens and Vector Attraction in Sewage Sludge* (guidance document) provides information on page 60 and appendix D for performing the SOUR. U.S. EPA's guidance document can be located at the following website:

http://water.epa.gov/scitech/wastetech/biosolids/biosolids_index.cfm

Land Application

Limited records regarding the land application of sewage sludge were available at the WWTP as the WWTP's sewage sludge contractor maintains the majority of the records. Please note that the record retention requirements will change July 1, 2011 and will establish that the WWTP's contractor must provide specific records

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regarding the land application program to be maintained at the WWTP. The new record retention requirements can be located in OAC rule 3745-40-09(C)(3) at the website provided in the "New Sewage Sludge Rules" section of this correspondence.

New Sewage Sludge Rules

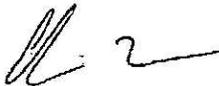
Please be aware that Ohio EPA's new sewage sludge rules will go effective July 1, 2011. Ohio EPA recommends that the WWTP review the new sewage sludge rules as they may affect the WWTP's current sewage sludge management program. For your convenience, the new sewage sludge rules can be located near the bottom of the following website:

http://www.epa.ohio.gov/dsw/rules/3745_40.aspx

Please submit a written response to Jacob Howdyshell by April 29, 2011 detailing how the above noted violations 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 or Mr. Howdyshell at (614) 644-2018 or via email at jacob.howdyshell@epa.state.oh.us at your earliest convenience. For your convenience, Mr. Howdyshell's mailing address is as follows:

Jacob Howdyshell
Ohio EPA Division of Surface Water
PO Box 1049
Columbus, OH 43216-1049

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt

cc: Walter Kubat, Jefferson County Water and Sewer District

ec: Jacob Howdyshell, Ohio EPA, CO, DSW
Aaron Pennington, Ohio EPA, SEDO, DSW