



Environmental  
Protection Agency

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

Re: Putnam County  
Columbus Grove WWTP  
Sewage Sludge  
**Notice of Violation (NOV)**

April 30, 2012

Mr. Jeff Vance, Administrator  
Village of Columbus Grove  
113 East Sycamore  
Columbus Grove, Ohio 45830

Dear Mr. Vance,

On March 1, 2012, Andrew Gall and Ryan Gierhart conducted an inspection at the Village of Columbus Grove Wastewater Treatment Plant (WWTP). As part of the inspection, they evaluated compliance with the Ohio Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. Bob Huff, Operator, was present and provided information on sludge operations and record keeping. The inspection included a walk through the plant.

The sludge generated at the Columbus Grove WWTP is currently receiving minimal treatment due to the heating system and mixing systems in the anaerobic digester no longer being operational. The WWTP is currently being upgraded as required by the CSO Long Term Control Plan, and includes the installation of new sludge pumps; however, it was been indicated that the digester heating system will not be repaired as part of the project.

In order to meet the treatment requirements of Ohio's Sewage Sludge Rules, sewage sludge must be stabilized through an actively mixed and heated anaerobic process. An unheated digester does not meet these requirements. **Therefore, as long as the heating system is not operational no sewage sludge from the Village of Columbus Grove shall be land applied.** All sewage sludge from Columbus Grove should either be hauled to a mixed solid waste landfill for disposal or be transferred to another National Pollutant Discharge Elimination System (NPDES) permitted facility for treatment. If the heating system is eventually replaced, the Village must submit a detailed written report indicating how the sewage sludge treatment and land application requirements of OAC 3745-40 will be met prior to resuming a land application of biosolids program. This report should be submitted to Ohio EPA NWDO for review and approval at least 90 days prior to resuming land application.

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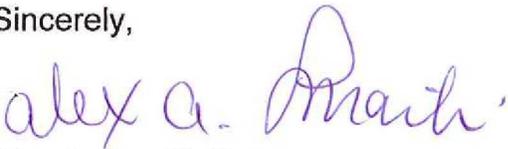
Mr. Huff indicated that Village staff had land applied sewage sludge on the farm field located next to the plant in late 2011. He indicated that the staff did not sample the sludge prior to land application in order to document that sludge treatment requirements had been met. This is a violation of the sludge monitoring requirements contained in the Village's NPDES permit and the requirements of OAC 3745-40-04(A). Please make sure that all Village WWTP employees are made aware that sewage sludge can no longer be land applied and must be hauled to the landfill for disposal or to another NPDES permitted facility for treatment.

Please submit a written response letter to Mr. Gall's attention within 30 days indicating the steps that will be taken to prevent any further violations of OAC 3745-40 from occurring. If these violations continue to occur, we will have no choice but to recommend escalated enforcement action to achieve compliance. Ohio's Sewage Sludge Rules can be found on the following Ohio EPA website:

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

If you have any questions regarding this letter, please contact Mr. Andrew Gall at (419) 373-3003 or via email at [andrew.gall@epa.state.oh.us](mailto:andrew.gall@epa.state.oh.us)

Sincerely,



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

AG/jlm

pc: Mr. Bob Huff, Operator

ec: Ryan Gierhart, Ohio EPA NWDO-DSW  
Inspection Tracking