



**Environmental
Protection Agency**

Joseph R. Costello, Governor

Andy Rypko, Lt. Governor

Robert L. Pittby, Director

May 9, 2012

RE: HOLMES COUNTY
KILLBUCK, VILLAGE OF
NPDES PERMIT NO. OH0025933
OHIO EPA PERMIT NO. 3PB00067*GD
SEWAGE SLUDGE INSPECTION

Mayor and Council
Village of Killbuck
P.O. Box 424
Killbuck, Ohio 44637-0424

Dear Mayor and Council:

On April 11, 2012, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code Chapter (OAC) 3745-40, Ohio's sewage sludge rules, at the Village of Killbuck wastewater treatment plant (WWTP). The undersigned was accompanied by Mr. Dean Stoll, Ohio EPA. Michael Judson, Operator in Charge, was present during the sewage sludge inspection and 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 inspection of the sewage sludge treatment units.

WWTP Information

The WWTP has a design treatment capacity of 411,000 gallons of wastewater per day and currently treats approximately 444,000 gallons of wastewater per day. Sewage sludge is treated within two aerobic digesters and one holding tank. Sewage sludge is dewatered on one storage pad and in four drying beds. One drying bed is currently utilized for storage.

Sewage Sludge Management

The WWTP is currently generating a class B sewage sludge by performing pathogen reduction (PR) alternative P-1, geometric mean of seven fecal coliform samples and vector attraction reduction (VAR) option VAR-1, 38% volatile solids reduction. Onsite sewage sludge storage capacity is approximately one year. The WWTP utilizes Agri-Sludge, Inc. to perform beneficial use of Class B biosolids.

Adequate records are being maintained to verify that the PR and VAR requirements and agronomic rates are being satisfied.

Fecal Coliform Monitoring

Fecal coliform samples have a six-hour hold time after collection. Unfortunately, the records being maintained by the WWTP do not indicate if the fecal coliform hold time is being satisfied, as the contract laboratory has not completed the time the samples were received on the chain of custody form. The WWTP must contact the contracted laboratory to determine if the fecal coliform six-hour hold time is being satisfied. Please submit a copy of a correctly completed chain of custody form that includes the applicable times for collection, receipt, and testing to Ohio EPA for review.

Standard Operating Procedure (SOP)

OAC 3745-40-09(C)(3)(c) requires a WWTP to develop a standard operating procedure (SOP) that, at a minimum, includes the following information:

1. Sample collection or monitoring locations;
2. The frequency at which sample collection or monitoring is to occur;
3. Sample collection or monitoring procedures;
4. Sample storage and preservation procedures; and
5. Sample or monitoring analysis procedures, including any calculations required for sample or monitoring analysis.

The WWTP has not developed the appropriate SOP. The WWTP must develop a SOP to comply with OAC 3745-40-09(C)(3)(c).

Notice and Necessary Information

OAC 3745-40-09(C)(3)(d) requires an example of the notice and necessary information (NANI) that is provided to the beneficial user, land owner, and farm operator. A copy of the NANI provided to the beneficial user, landowner, and farm operator for 2011 was not available. WWTP records document that the last date of beneficial use occurred on June 7, 2011. The WWTP must begin maintaining copies of the NANI that satisfies OAC 3745-40-05.

Beneficial Use Site Authorization Records

OAC 3745-40-09(C)(3)(e) requires the WWTP to maintain a copy of the application for an authorization for a beneficial use site and the Ohio EPA beneficial use site authorization letter for each beneficial use site that is utilized for beneficial use. The WWTP could not locate these files at the time of the inspection and committed to reviewing onsite records and contacting Agri-Sludge, Inc. In the event that the WWTP cannot locate copies of these documents, a new application for beneficial use sites must be submitted to Ohio EPA for review.

Frequency Violations

Ohio EPA records indicate that the following frequency violations occurred:

Station	Reporting Code	Parameter	Monitoring Frequency	Violation Date
581	71921	Mercury, Total In Sludge	1/Quarter	03/01/2009
581	31641	Fecal Coliform in Sludge	1/Quarter	03/01/2009
581	51129	Sludge Fee Weight	1/Quarter	03/01/2009
581	70316	Sludge Weight	1/Quarter	06/01/2009

Beneficial Use Records

OAC 3745-40-09(C)(4) requires beneficial user records that include the following information:

1. Records showing that the class B biosolids were not stored for more than ninety days at the beneficial use site;
2. Forecast or actual precipitation data in accordance with paragraphs (B)(1) and (B)(2) of rule 3745-40-08 of the Administrative Code;
3. The sign placement records for all authorized beneficial use sites in accordance with paragraph (D) of rule 3745-40-11 of the Administrative Code;
4. A description of how the agronomic rate is met at each beneficial use site including, but not limited to, how the beneficial use application equipment is calibrated; and
5. A copy of the information provided to the farm operator in accordance with paragraph (C) of rule 3745-40-05 of the Administrative Code.

The WWTP has not performed beneficial use of biosolids after July 1, 2011, the date revised OAC 3745-40 became effective. Please be aware that the WWTP must begin maintaining the appropriate records for the above items.

Screening Requirements

Please be aware that OAC 3745-40-02(C)(3)(a) will require screening to be performed in one of the following methods starting July 1, 2015:

1. Screening influent wastewater and influent septage through a bar screen with a maximum aperture of five-eighths inch (1.59 centimeters) designed to screen the average daily design flow;
2. Screening all biosolids through a bar screen with a maximum aperture of five-eighths inch (1.59 centimeters) prior to beneficial use; or
3. Obtaining approval from the director for an alternative method that achieves a removal rate equal to or greater than that achieved by the screening standards in paragraph (C)(3)(a)(i) or (C)(3)(a)(ii) of this rule.

The WWTP currently has an approximately 1 inch to 1.5-inch bar screen and will have to satisfy the new screening requirements July 1, 2015.

New Sewage Sludge Rules

Please be aware that new rules regulating sewage sludge became effective on July 1, 2011 and that the WWTP's sewage sludge management program must be modified in order to comply with the new requirements. For your convenience, Ohio EPA's new sewage sludge rules can be obtained from the following website:

http://www.epa.ohio.gov/portals/35/rules/40_all_eff_jul11.pdf

Written correspondence must be submitted to Ohio EPA by May 31, 2011 that details how the WWTP will address the above deficiencies and items. Should you have any questions regarding the sewage sludge inspection, please contact me at your earliest convenience 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: Michael Judson, Village of Killbuck

ec: Tom Abraham, Agri-Sludge, Inc
Andrew Gall, Ohio EPA, DSW, NWDO