



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 5, 2012

RE: LORAIN COUNTY
FRENCH CREEK BIOENERGY, LLC
PROBIO-K2 PILOT PROJECT

Mr. Bruce Bailey
Quasar Energy Group
7624 Riverview Road
Independence, OH 44141

Mr. Bailey:

On June 29, 2012, Ohio EPA received your request for a pilot project that proposes to evaluate the Probio-K2 effluent management product (pilot project). In order for Ohio EPA to evaluate the proposed pilot project, the following information must be submitted:

1. The request details that two to three of the larger drying bed sections located at the French Creek wastewater treatment works are to be utilized over the next three to four months. A letter of authorization from the City of North Ridgeville permitting the two to three drying beds to be utilized by French Creek BioEnergy, LLC for the period of up to four months must be submitted. The letter of authorization must include the following:
 - a. A statement that the loss of up to three drying beds will not adversely impact the City of North Ridgeville French Creek wastewater treatment plant (WWTP) sewage sludge management program; and
 - b. A statement that the City of North Ridgeville French Creek WWTP will accept the possible wastewater generated from the Probio-K2 treatment process occurring on the drying beds.
2. The total quantity of sewage sludge that will be utilized during the pilot project.
3. The total quantity of Probio-K2 that will be utilized during the pilot project.
4. The timeframe for the treatment process, in days, for the Probio-K2 treatment process to produce a biosolid;
5. A description of the type of equipment that will be utilized during the Probio-K2 application and treatment processes.
6. The total volume of sewage sludge that can be treated within one drying bed and one application of Probio-K2 effluent management product.
7. The parameters that will be monitored during the pilot project.

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8. Specific information regarding the sample collection procedures, monitoring frequencies, and monitoring locations of the sewage sludge and sewage sludge/Probio-K2 mixture that will be utilized during the pilot project.
9. The type, weight, quantity, and county of origin of all woody or cellulosic materials that will be utilized during the pilot project.
10. Your request states, "we expect to meet Class A compost requirements with this demo upon conclusion of the testing." Information regarding which pathogen reduction alternative (PR) and vector attraction reduction option (VAR), as defined within Ohio Administrative Code Chapter 3745-40, will be satisfied. The pilot project must define how the monitoring for PR and VAR will be performed in order to determine if an exceptional quality biosolid can be generated. Appropriate records must be maintained and submitted to Ohio EPA to document whether the Probio-K2 treatment process can achieve an exceptional quality biosolid.
11. How the sewage sludge treated with Probio-K2 will be properly managed for disposal.

Should you have any questions regarding this matter, 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

ec: Virginia Wilson, Ohio EPA, DSW, NEDO
Andrew Gall, Ohio EPA, DSW, NWDO
Jacob Howdyshell, Ohio EPA, DSW, CO
Donald Daley, North Ridgeville
Lou Cover, North Ridgeville
Mel Kurtz, Quasar Energy Group
Bruce Bailey, Quasar Energy Group
Ike Habib, HB Engineering