



**Environmental  
Protection Agency**

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

September 12, 2012

RE: MEDINA COUNTY  
CITY OF WADSWORTH  
NPDES PERMIT NO. OH0027936  
OHIO EPA PERMIT NO. 3PD00022\*QD  
SEWAGE SLUDGE INSPECTION

John Clark, Superintendent  
City of Wadsworth  
1015 Airport Drive  
Wadsworth, OH 44281

Dear Mr. Clark:

On August 27, 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 City of Wadsworth wastewater treatment plant (WWTP). You represented the facility and provided information regarding the WWTP's sewage sludge operations. The sewage sludge inspection consisted of a review of the WWTP's contact information and sewage sludge records, completion of a compliance checklist, and an inspection of the sewage sludge treatment units.

WWTP information

The WWTP has a design treatment capacity of 5.0 million gallons of wastewater per day (MGD) and currently treats approximately 2.2 to 2.3 MGD. Sewage sludge is treated within one 450,000-gallon capacity primary anaerobic digester, one 240,000-gallon capacity secondary anaerobic digester, two 155,000-gallon capacity holding tanks, one gravity thickener, one belt filter press, and one covered storage pad. An additional 235,000-gallon capacity primary anaerobic digester and a 240,000-gallon capacity secondary anaerobic digester are currently offline.

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.

The geometric mean was not being calculated correctly, as the average of the seven fecal coliform samples was being reported. During the inspection, I instructed you to begin utilizing the correct calculation and provided Ohio EPA's compliance assistance tools to you, which you immediately utilized to correct the issue. Copies of the corrected 2012 geometric mean calculations were provided to Ohio EPA.

Appropriate records are being maintained to document compliance with VAR-1, 38% volatile solids reduction.

Cumulative Pollutant Loading Rate (CPLR)

Ohio EPA records detail that the following values were reported by the WWTP:

Parameter	Units	Date Reported	Reported Value
Lead, Total In Sludge	mg/kg	12/4/2008	311.38

Information must be provided to Ohio EPA that details how the biosolids containing the above reported value for lead was managed (i.e. beneficial use on beneficial use sites or disposal within a landfill). In the event that the Class B biosolids containing the above reported value for lead was beneficially used, the beneficial use site where beneficial use of the Class B biosolids containing the above reported value for lead is now designated as a CPLR beneficial use site since the above reported value for lead exceed the 300 mg/kg average concentration limit (ACL) and is below the 840 mg/kg ceiling limit (CL).

As a result, if the Class B biosolids containing the above reported value for lead were beneficially used, the following records must now be maintained in accordance with OAC 3745-40-09(C)(5) and (6):

1. The location, by either street address or latitude and longitude, of each beneficial use site on which class B are beneficially used;
2. The number of acres of each beneficial use site where the class B biosolids are beneficially used;
3. The date the class B biosolids were beneficially used at the beneficial use Site; and
4. The cumulative amount, in pounds per acre, of each metal listed in table D-2 of rule 3745-40-04 of the Administrative Code that is beneficially used at each beneficial use site.

#### New Record Requirements

On July 1, 2011, Ohio EPA's revised sewage sludge rules became effective which included new requirements for all WWTPs to maintain additional records regarding sewage sludge management. The following deficiencies are records that the WWTP must begin maintaining in order to comply with OAC 3745-40:

#### A. 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 regarding pathogen reduction and vector attract reduction:

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.

#### B. Field Storage

OAC 3745-40-09(C)(4)(b) requires the WWTP to maintain a copy of the beneficial user records that show the class B biosolids were not stored for more than ninety days at each beneficial use site. The WWTP explained that biosolids are beneficially used immediately upon removal from the WWTP.

#### C. Agronomic Rate Records

OAC 3745-40-09(C)(4)(c)(iii) requires the WWTP to maintain agronomic rate calculations for each beneficial use site. On April 2, 2012, beneficial use of biosolids occurred on Ohio EPA No. 67-00226. No agronomic rate calculations were available for this beneficial use event.

- D. Sign Placement Records  
OAC 3745-40-09(C)(4)(c)(iii) requires the WWTP to maintain sign placement records for all authorized beneficial use sites. No sign placement records were available.
- E. Calibration Records  
OAC 3745-40-09(C)(4)(d) requires the WWTP to maintain 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. No records regarding how the equipment utilized by Agri-Sludge, Inc. was available.
- F. Beneficial Use Site Authorization Records  
OAC 3745-40-09(C)(5)(e) requires the WWTP to maintain a copy of the application for an authorization for a beneficial use site and the Ohio environmental protection agency beneficial use site authorization letter for each beneficial use site that is utilized for beneficial use. A copy of this information was not available. On August 28, 2012, Ohio EPA sent an email containing electronic copies of the beneficial use sites and approval letters issued to the WWTP.

During the inspection, you committed to contacting Agri-Sludge, Inc. in order to obtain copies of the above information and to ensure that in the future copies of all required information are provided to the WWTP. The WWTP ensure that all required records are maintained in accordance with OAC 3745-40-09.

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](mailto:chris.moody@epa.ohio.gov).

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM/cs

Ec: Tom Abraham, Agri-Sludge, Inc.