



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

September 24, 2012

RE: PORTAGE COUNTY
AURORA WESTERLY WWTP
NPDES PERMIT NO. OH0098043
OHIO EPA PERMIT NO. 3PD00046*ED
SEWAGE SLUDGE INSPECTION

Lynn E. McGill, Mayor
Aurora City Hall
130 South Chillicothe Road
Aurora, Ohio 44202

Dear Mayor McGill:

On August 29, 2012, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC), Chapter (OAC) 3745-40, Ohio's sewage sludge rules, at the Aurora Westerly wastewater treatment plant (WWTP). The facility was represented by Andy Krispinsky, Facilities Manager, who 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 1.5 million gallons of wastewater per day (MGD) and currently treats approximately 0.95 MGD. Sewage sludge is treated within three aerobic digesters (total capacity of 800,000 gallons), one belt filter press, and one concrete storage pad. Onsite sewage sludge storage capacity is approximately 120 days.

Sewage Sludge Management

Sewage sludge from the Aurora Central WWTP is transported to Aurora Westerly WWTP for dewatering and is then returned to the Aurora Central WWTP for beneficial use. The WWTP is currently generating a class B biosolid by performing pathogen reduction (PR) alternative P-1, geometric mean of seven fecal coliform samples, and vector attraction reduction (VAR) option VAR-4, specific oxygen uptake rate (SOUR).

P-1, Geometric Mean of Seven Fecal Coliform Samples

The geometric mean was not being calculated correctly, as the average of the seven fecal coliform samples was being reported. The WWTP must begin performing and reporting the geometric mean of the seven fecal coliform samples. Ohio EPA has developed a spreadsheet that will automatically calculate the geometric mean of the fecal coliform samples. For your convenience, the spreadsheet can be located under the "compliance assistance tools" section at the following website:

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

VAR-4, SOUR

Adequate records are being maintained to verify that the VAR requirements are being satisfied. Ohio EPA requests that the temperature readings of the sewage sludge samples be recorded and the calculation for the temperature correction start being maintained. Ohio EPA has

developed a spreadsheet that will automatically calculate the SOUR, including the temperature correction. For your convenience, the spreadsheet can be located under the "compliance assistance tools" section at the above website.

Annual Sewage Sludge Report (Form 4229)

According to the 2011 annual sewage sludge report (ASR), the WWTP is performing PR-2, aerobic digestion, and VAR-10, immediate incorporation. The 2012 ASR must be reflective of only the PR and VAR that is being performed.

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:

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. Notice and Necessary Information

OAC 3745-40-09(C)(3)(d) requires the WWTP to maintain a copy of the notice and necessary information that is provided to the beneficial user, land owner, and farm operator.

C. 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.

D. 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.

E. Forecast / Precipitation Data

OAC 3745-40-09(C)(4)(c)(iv) requires the WWTP to maintain forecast or actual precipitation data in accordance with OAC 3745-40-08(B).

F. Sign Placement Records

OAC 3745-40-09(C)(4)(c)(vi) requires the WWTP to maintain records of the date when signs were posted and removed from any beneficial use site.

G. 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. The WWTP has calibration records for the equipment utilized by the City of Massillon; however, no records regarding the equipment utilized by Burch Hydro, Inc. were available.

The WWTP committed to contacting Agri-Sludge, Inc. to obtain copies of the beneficial user records.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period of September 1, 2006 through September 1, 2012 indicates that the following violations of Station 581 of the NPDES permit have occurred:

A. Frequency Violations

Reporting Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
581	71921	Mercury, Total In Slud	1/Month	1	0	07/01/2008
581	78465	Molybdenum In Sludge	1/Month	1	0	07/01/2008
581	99991	Nitrogen, Ammonia In S	1/Month	1	0	07/01/2008

B. Numeric Violations

Reporting Station	Reporting Code	Parameter	Units	Date	Reported Value
581	01028	Cadmium, Total In Sludge	mg/kg	12/12/2008	36100*

*It appears that this might be a data entry issue. Please review the original analytical result and confirm if this reported result is correct.

The WWTP must submit written correspondence detailing how the above deficiencies are to be resolved. 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: Andy Krispinsky, Facilities Manager

Ec: Tom Abraham, Agri-Sludge, Inc.