



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

Re: City of Lima WWTP  
Inspection  
NPDES-Biosolids  
Allen County  
2PE00000

May 3, 2019

Mr. David Schnipke  
Environmental Compliance Manager  
Lima WWTP  
50 Town Square  
Lima, Ohio 45801-4900

Dear Mr. Schnipke:

On April 4, 2019, Ohio EPA representatives Andrew Gall, Peggy Christie and Lori Komorowski conducted an inspection of the City of Lima wastewater treatment plant (WWTP). As part of the inspection, Mr. Gall evaluated the City of Lima WWTP's compliance with Ohio's Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. Eric Markley, Ms. Emily Kerber and Mr. Jerry Coffey were present on behalf of the City of Lima and provided information on sludge treatment operations and record keeping.

Sewage sludge at the Lima WWTP is treated in anaerobic digesters. The methane gas produced during the digestion process is used to power two micro-turbines that generate electric power and heat for the plant. The digested sludge is dewatered with belt filter presses and then mixed with lime and fly ash using the N-Viro Process. The temperature and pH of the blended material is monitored over a 72-hour period to ensure that the final treated material meets the EQ biosolids treatment requirements for pathogen reduction and vector attraction reduction. Once compliance with EQ treatment requirements is documented, the biosolids are stored at the WWTP before being released to Lima Compost/Wright Mulch for distribution for beneficial use.

It was indicated that EQ biosolids are no longer being transferred to the Lima Compost Facility for storage or for blending with compost, wood chips and dirt, which is regulated by Ohio EPA under sludge management plan (SMP) No. 2MP00014. Currently, Lima Compost is distributing all the EQ biosolids from the storage areas at the Lima WWTP directly to farmers for beneficial use on farm fields. The City is providing copies of the biosolids monitoring results to Lima Compost/Wright Mulch to meet the permittee Notice and Necessary Information (NANI) requirements of OAC 3745-40-05(A). The City is no longer receiving copies of biosolids end user reports from Lima Compost.

An update to Ohio's Sewage Sludge rules took effect on December 1, 2018, and contains record keeping requirements for both permittees who prepare exceptional quality biosolids for distribution and beneficial users of bulk exceptional quality biosolids. The permittee record keeping requirements can be found in OAC 3745-40-09 (C)(1)(a)–(f) and in addition to treatment records are also now required to maintain copies of the beneficial user records at the permittee's facility. The beneficial

user record keeping requirements can be found in OAC 3745-40-09(C)(2)(a)-(g). Beneficial users of bulk EQ biosolids are now required by the rule to maintain soil monitoring results, agronomic rate calculations and records of the amounts of bulk EQ biosolids that were used and the dates that beneficial use occurred. The biosolids rules define a "beneficial user" as the person who sprays or spreads class B or bulk EQ biosolids onto the surface or injects biosolids below the surface of a beneficial use site. We request that the City of Lima review the new record keeping requirements of the sludge rules with their distribution contractor, Lima Compost, and the beneficial users of Lima's EQ biosolids to ensure that the required records will start being maintained and available at the Lima WWTP for review during Ohio EPA compliance inspections. Please submit a written response to Mr. Gall's attention at the NWDO that indicates how Lima WWTP and their biosolids contractor and beneficial users will comply with the new record keeping requirements of Ohio's Sewage Sludge rules.

For your convenience, Ohio's Sewage Sludge rules are located on the following Ohio EPA's biosolids webpage: <https://www.epa.ohio.gov/dsw/sludge/biosolid#137944360-rules>.

If you have questions regarding the inspection or meeting the requirements of the rules, please contact Mr. Andrew Gall at (419) 373-3003 or via email at [andrew.gall@epa.ohio.gov](mailto:andrew.gall@epa.ohio.gov).

Sincerely,



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

AG/jlm

ec: Andrew Gall, NWDO-DSW  
Peggy Christie, NWDO-DSW  
Alex Smaili, NWDO-DSW  
Eric Markley, City of Lima  
Tracking