

October 21, 2025

**TRANSMITTED ELECTRONICALLY**

James Bennett  
Pickaway Correctional Institute  
P.O. Box 209  
Orient, Ohio 43146

**Re: Pickaway Correctional Institute  
Inspection  
NPDES  
Pickaway County  
4PP00003**

**Subject: Ohio EPA Biosolids Inspection**

Dear Mr. Bennett:

On April 10, 2025, Ohio EPA Division of Surface Water (DSW) conducted a Biosolids Inspection at Pickaway Correctional Institute's Wastewater Treatment Plant (PCI), located at 11781 State Route 762 in Orient, Ohio 43146. Representing Ohio EPA were Whitney White from the Ohio EPA Central Office and Joanna Asuncion from Central District Office, who conducted a separate Compliance Evaluation Inspection (CEI). Representing PCI was Kenneth Griffith, James Lyons, and Nathan Thornsberry.

The purpose of the inspection was to evaluate the PCI biosolids management program for compliance with Ohio's environmental laws and regulations as found in Chapter 6111 of the Ohio Revised Code (ORC), Chapter 3745-40 of the Ohio Administrative Code (OAC), and the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit.

**NPDES Permit:**

PCI's NPDES permit (4PP00003\*HD) has an effective date of February 01, 2023, and an expiration date of January 31, 2028. The permit contains the following stations for monitoring sewage sludge and biosolids: 581 (Class B land application), 586 (disposal in a landfill), and 588 (transfer to another NPDES permit holder).

**Facility Description:**

PCI has a design capacity of 2.3 million gallons per day (MGD) with an average flow of 0.724 MGD and a peak flow of 3.474 MGD in 2024. Wastewater treatment components include headworks fine screening with less than a 1.59 cm aperture, a grit removal system, two oxidation ditches, two clarifiers, a mixing chamber, two anoxic tanks, a gravity thickener, and an aerobic digester. Biosolids are dewatered using a belt filter press and stored on the biosolids storage pad. The storage pad provides four months or about 120 days of storage. During the inspection, it was stated that the biosolids stored at that time would be taken to a landfill by Synagro, and subsequent biosolids will be beneficially used once the storage pad is full.

### **Annual Sludge Reports:**

PCI's biosolids program includes 22 authorized Class B biosolids beneficial use sites in Pickaway County totaling 927.5 acres. 75.45 dry tons of sludge from PCI was landfilled in 2020. Biosolids were not removed in 2021 and 2024. PCI's 2022 Annual Sludge Report (ASR) indicates that site 65-00050 was used in 2022. Gibson Lime Services, PCI's beneficial user at the time, informed Ohio EPA that site 65-00110 was used in 2022. PCI's 2023 ASR indicates that no sludge was removed during the year; however, Gibson Lime Services reported that 373.1 wet tons of biosolids were beneficially used at sites 65-00177, 65-00178, and 65-00179 in 2023. The 2020-2023 reporting year ASRs were submitted on time. The 2024 reporting year ASR was submitted after the March 1 deadline on July 31, 2025. All annual sludge fees have been paid in full.

### **Findings:**

1. The Geometric Mean of Seven Fecal Coliform Samples was listed as the pathogen reduction option used by PCI on their 2022 ASR; however, fecal coliform laboratory results were not attached to the report and were not available on site.
2. The 2022 ASR contained one SOUR test for 2015, six SOUR tests for 2021, and two SOUR tests for 2022. The sludge tested in July of 2022 was 2.5% total solids, and 7.2% total solids in November of 2022.
3. Analytical results for metals were not available at the facility during the inspection; however, results were reported on the 2021 and 2022 ASR and the Electronic Discharge Monitoring Report (eDMR). The reported metals results were well below NPDES permit limits.
4. Some beneficial use records were provided on the 2022 ASR for the beneficial use event that occurred in November of 2022. This includes an agronomic rate calculation (ARC), signage records, and a site transfer application. Upon review, it was determined that the ARC and transfer application were incomplete, and the signage records indicated that signs were not in place for seven days prior to the delivery of biosolids to the beneficial use site. Gibson Lime Services provided an invoice for the beneficial use of 567 wet tons of biosolids on December 2, 2022, but records were not available for this beneficial use event. Soil analytical results, Notice and Necessary Information (NANI) forms, forecast, and storage records were not available for the 2022 beneficial use events.
5. PCI could not provide beneficial use records for 2023; however, Gibson Lime Services reported that 373.1 wet tons of biosolids were beneficially used at sites 65-00177, 65-00178, and 65-00179.
6. During the inspection, it was stated that most of the PCI biosolids analytical data and beneficial use records were lost when their former operator retired. Analytical results for metals concentration in sludge, soil analytical results for beneficial use sites, site authorization letters and applications, forecast records, beneficial user and generator Notice and Necessary Information forms, standard operating procedures (SOPs), and any records regarding beneficial use of biosolids in 2023 were unavailable.

**Recommendations:**

These recommendations are offered by Ohio EPA in an effort to provide compliance assistance to your facility.

1. Please provide the analytical results and geometric mean calculations for seven fecal coliform grab samples to Ohio EPA prior to beneficially using biosolids from PCI. Additionally, please develop a fecal coliform sampling and analysis SOP that includes sampling and analysis frequency, location, and method. Guidance for developing biosolids SOPs is available on the [Ohio EPA Biosolids Website](#). All fecal coliform analytical results should be included in all future ASRs.
2. As stated in the Notice of Violation (NOV) letter issued to PCI on May 19, 2025, please develop a SOUR test SOP. An example SOUR test SOP template is available on the [Ohio EPA Biosolids Website](#). Ohio EPA recommends that SOUR samples be collected from the digester to ensure that the samples are between 0.5-2% solids and are representative of the digester's performance. If the DO of the sludge sample falls below 1.0 mg/L, then the test should be restarted; in this case, the sample should be oxygenated through agitation or aeration. Please provide seven SOUR test results to Ohio EPA prior to beneficially using biosolids from PCI. All future ASRs should include SOUR test analytical results and calculations.
3. As stated in the PCI NOV issued on May 19, 2025, please develop a biosolids sampling SOP that describes the sampling frequency, method, and parameters to be monitored during each reporting period. This plan should include how records will be maintained so that they are available on site for at least five years after they are generated.
4. Please review the additional information section for violations six through nine of the NOV issued on May 19, 2025, to PCI and complete the requested actions for each violation to comply with OAC 3745-40-06, 08, 09, and 11. Please note that the beneficial use SOP requested in violation six of the PCI NOV should also describe how soil analytical results will be obtained and utilized, how generator notice and necessary information (NANI) forms will be developed and provided to farmers, how forecast records will be maintained, and how biosolids storage records will be maintained for future beneficial use sites.
5. Ohio EPA recommends that two or more staff members maintain copies of biosolids beneficial use records. Additionally, at least two staff members should be trained in collecting and analyzing (if applicable) biosolids samples for the parameters listed in Table 581 of PCI's NPDES permit. Copies of all records developed by beneficial users should be available at PCI.

If you have any questions or comments concerning the enclosed inspection report, please contact me at 614-705-1141 or e-mail at [whitney.white@epa.ohio.gov](mailto:whitney.white@epa.ohio.gov).

Sincerely,

*Whitney White*

Whitney White  
Biosolids Coordinator (Environmental Specialist II)  
Division of Surface Water  
Central Office

Ec:

James Bennett, Pickaway Correctional Institute WWTP, Operator of Record

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### **BIOSOLIDS GENERATOR INSPECTION CHECKLIST**

#### **1. Contact Information**

|                                                                                                                                                                  | <b>Treatment Works</b>                                                     | <b>Contractor</b>                                            | <b>Inspector</b>                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>Entity Name</b>                                                                                                                                               | Pickaway Correctional Institute                                            | Synagro Technologies                                         | Ohio EPA                                                                   |
| <b>Contact</b>                                                                                                                                                   | James Bennett                                                              | Ryan Wenger                                                  | Whitney White                                                              |
| <b>Title</b>                                                                                                                                                     | Operator of Record                                                         | Area Director                                                | Environmental Specialist II                                                |
| <b>Phone</b>                                                                                                                                                     | (419) 560-2721                                                             | 614-206-9547                                                 | (614)705-1141                                                              |
| <b>Email</b>                                                                                                                                                     | <a href="mailto:james.bennett@drc.ohio.gov">james.bennett@drc.ohio.gov</a> | <a href="mailto:rwenger@synagro.com">rwenger@synagro.com</a> | <a href="mailto:whitney.white@epa.ohio.gov">whitney.white@epa.ohio.gov</a> |
| <b>Mailing Address</b>                                                                                                                                           | 11781 State Route 762<br>Orient, Ohio 43146                                | 17860 Ankneytown Road<br>Fredericktown, Ohio 43019           | 50 West Town Street<br>Columbus, Ohio 43215                                |
| Joanna Asuncion, Ohio EPA<br>Kenneth Griffith, Operations Manager<br>Jim Lyons, Class I Wastewater Operator<br>Nate Thornsberry, Class I Drinking Water Operator |                                                                            |                                                              |                                                                            |

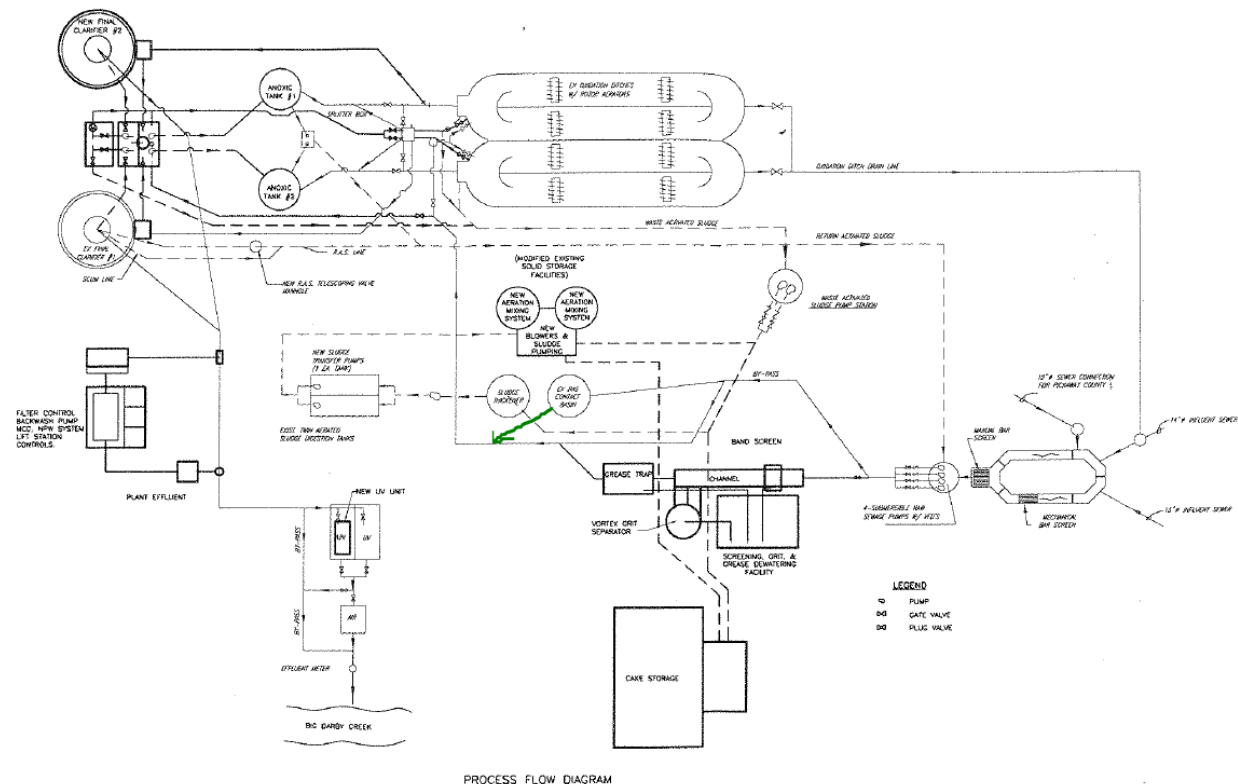
#### **2. Facility Information**

|                                                                                                                                                   |                                         |                                     |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------|--|
| Average Daily Flow (MGD)                                                                                                                          | 0.724                                   |                                     |  |
| Design Treatment Capacity (MGD)                                                                                                                   | 2.3                                     |                                     |  |
| Biosolids Storage Capacity (Years)                                                                                                                | 2                                       |                                     |  |
| Contracted Alternative / Contingency Disposal                                                                                                     | SWACO Landfill                          |                                     |  |
| Headworks Screening (max aperture of 1.59 cm)                                                                                                     | Screen Size: <5/8 inch                  |                                     |  |
|                                                                                                                                                   | Alternative: N/A                        |                                     |  |
| Planned Upgrades: <ul style="list-style-type: none"><li>Secondary RAS pump was repaired in March 2025</li></ul>                                   |                                         |                                     |  |
| Recent Maintenance Issues/Equipment Failures: <ul style="list-style-type: none"><li>Two broken aerators in the southern oxidation ditch</li></ul> |                                         |                                     |  |
| Are work and storage areas properly maintained?                                                                                                   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No         |  |
| NPDES Permit Verification                                                                                                                         | In Permit                               | Beneficial Use or Disposal          |  |
| Station 581: Class B Biosolids                                                                                                                    | <input checked="" type="checkbox"/>     | <input checked="" type="checkbox"/> |  |
| Station 584: Exceptional Quality Biosolids                                                                                                        | <input type="checkbox"/>                | <input type="checkbox"/>            |  |
| Station 585: Incineration                                                                                                                         | <input type="checkbox"/>                | <input type="checkbox"/>            |  |
| Station 586: Landfill                                                                                                                             | <input checked="" type="checkbox"/>     | <input checked="" type="checkbox"/> |  |
| Station 588: Transfer to NPDES Permittee                                                                                                          | <input checked="" type="checkbox"/>     | <input type="checkbox"/>            |  |

### 3. Sewage Sludge Treatment

| Treatment Units   | Quantity | Comments<br>(Online/Offline and Capacity/Dimensions)               |
|-------------------|----------|--------------------------------------------------------------------|
| Oxidation Ditch   | 2        | The northern oxidation ditch was offline for repairs and cleaning. |
| Clarifiers        | 2        |                                                                    |
| Anoxic Tanks      | 2        |                                                                    |
| Gravity Thickener | 1        |                                                                    |
| Aerobic Digester  | 1        |                                                                    |
| Belt Filter Press | 1        | The belt press is operated monthly.                                |
| Storage Pad       | 1        |                                                                    |

#### 4. Wastewater Treatment Train Flow Chart



## 5. Operational Questions

|                                  |                       |                   |
|----------------------------------|-----------------------|-------------------|
| Digester Operational Temperature | Digester Environment: | Temperature:      |
|                                  | Aerobic               | Ambient           |
|                                  | Anaerobic             | N/A               |
| Dewatering Efficiency            | Sample Location:      | Average % Solids: |
|                                  | Prior to Dewatering   | 1.9%              |
|                                  | After Dewatering      | 17-19%            |

## 6. Field Storage Requirements

|                                                                                                                                                                                          |        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Are biosolids being stored at a beneficial use site? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA                                     | Notes  |
| Are records being maintained to show < 90 days storage, amounts, and map with locations? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA | Notes: |

## 7. Pathogen Reduction Alternative

|                                                                                                                                                                                                                                                                                                                  |                                                                                                                  |                                                       |                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                         | <b>P-1</b>                                                                                                       | <b>Geometric Mean of Seven Fecal Coliform Samples</b> | <b>Less than two million most probable number or colony forming units per gram of total solids (dry weight basis).</b> |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                         | Documentation of stabilization via an actively mixed aerobic or anaerobic process or through lime stabilization. |                                                       |                                                                                                                        |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                         | Fecal coliform analytical results.                                                                               |                                                       |                                                                                                                        |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                         | The geometric mean calculations.                                                                                 |                                                       |                                                                                                                        |
| <b><u>Comments:</u></b>                                                                                                                                                                                                                                                                                          |                                                                                                                  |                                                       |                                                                                                                        |
| <ul style="list-style-type: none"><li>P-1: The Geometric Mean of Seven Fecal Coliform Samples was listed as the pathogen reduction option used on the 2022 reporting year annual sludge report (ASR); however, fecal coliform laboratory results were not attached to the report or available on site.</li></ul> |                                                                                                                  |                                                       |                                                                                                                        |

## 8. Vector Attraction Reduction Option

|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                           |                                                                                                                                                                                                                                 |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <b>VAR-4</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Specific Oxygen Uptake Rate (SOUR)</b> | <b>For aerobic sewage sludge that is treated between 10°C and 30°C (50°F and 86°F), the specific oxygen uptake rate shall be ≤1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at 20°C (68°F).</b> |
| <input checked="" type="checkbox"/> | Dissolved oxygen readings at 1-minute intervals over fifteen-minutes.                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                           |                                                                                                                                                                                                                                 |
| <input checked="" type="checkbox"/> | Temperature records showing that the test was corrected to 20°C (68°F): <div style="text-align: right;"> <math display="block">\text{SOUR}_{20\text{-degrees Celsius}} = \text{SOUR}_{T\text{-degrees Celsius}} \times \Theta^{(20-T)}</math> <p>(Where T is the temperature of the sewage sludge when the SOUR test was started; and<br/>Where <math>\Theta = 1.05</math> if <math>T &gt; 20</math> degrees Celsius; or<br/>Where <math>\Theta = 1.07</math> if <math>T &lt; 20</math> degrees Celsius)</p> </div> |                                           |                                                                                                                                                                                                                                 |
| <input checked="" type="checkbox"/> | Total solids for the sewage sludge sample.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                           |                                                                                                                                                                                                                                 |

|                                                                                                                                                                                                                                                                                                         |                    |                          |                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------------|--------------------------|
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                | Sour calculations: | Max. SOUR: 0.3 (mg/g)/hr | Min. SOUR: 0.1 (mg/g)/hr |
| <b>Comments:</b> <ul style="list-style-type: none"> <li>Nine SOUR test results were provided on the 2022 ASR; however, only two tests were conducted in 2022. These results were not available at the facility. The results attached to the 2022 ASR were provided to PCI on April 11, 2025.</li> </ul> |                    |                          |                          |

## 9. Biosolids Classification

|                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|-------------------------------------------|---------------------------------|----------------------------------|---------------------------------|-------------------------------|----------------------------------|-------------------------------|-------------------------------------|-----------------------------------|-------------------------------------------|--------------------------------------------------|-------------------------------------------|------------------------------------------|--|--|--|
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | <b>Class B</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Record Requirements</b>                       |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | The following analytical results: <table border="1"> <tr> <td><input type="checkbox"/> Arsenic</td> <td><input type="checkbox"/> Copper</td> <td><input type="checkbox"/> Mercury</td> <td><input type="checkbox"/> Nickel</td> </tr> <tr> <td><input type="checkbox"/> Zinc</td> <td><input type="checkbox"/> Cadmium</td> <td><input type="checkbox"/> Lead</td> <td><input type="checkbox"/> Molybdenum</td> </tr> <tr> <td><input type="checkbox"/> Selenium</td> <td><input type="checkbox"/> Ammonia Nitrogen</td> <td><input type="checkbox"/> Total Kjeldahl Nitrogen</td> <td><input type="checkbox"/> Total Phosphorus</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> Total Potassium</td> <td colspan="2"></td> </tr> </table>                                                     |                                                  | <input type="checkbox"/> Arsenic          | <input type="checkbox"/> Copper | <input type="checkbox"/> Mercury | <input type="checkbox"/> Nickel | <input type="checkbox"/> Zinc | <input type="checkbox"/> Cadmium | <input type="checkbox"/> Lead | <input type="checkbox"/> Molybdenum | <input type="checkbox"/> Selenium | <input type="checkbox"/> Ammonia Nitrogen | <input type="checkbox"/> Total Kjeldahl Nitrogen | <input type="checkbox"/> Total Phosphorus | <input type="checkbox"/> Total Potassium |  |  |  |
| <input type="checkbox"/> Arsenic                                                                                                                                                                                                                                          | <input type="checkbox"/> Copper                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <input type="checkbox"/> Mercury                 | <input type="checkbox"/> Nickel           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/> Zinc                                                                                                                                                                                                                                             | <input type="checkbox"/> Cadmium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> Lead                    | <input type="checkbox"/> Molybdenum       |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/> Selenium                                                                                                                                                                                                                                         | <input type="checkbox"/> Ammonia Nitrogen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <input type="checkbox"/> Total Kjeldahl Nitrogen | <input type="checkbox"/> Total Phosphorus |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/> Total Potassium                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | Standard Operating Procedure(must include) <ul style="list-style-type: none"> <li><input type="checkbox"/> Sample collection or monitoring locations</li> <li><input type="checkbox"/> Sample collection/monitoring frequency</li> <li><input type="checkbox"/> Sample collection/monitoring procedures</li> <li><input type="checkbox"/> Sample storage and preservation procedures</li> <li><input type="checkbox"/> Sample/monitoring analysis procedures</li> <li><input type="checkbox"/> Any calculations required for sample/monitoring analysis</li> </ul>                                                                                                                                                                                                                                      |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | Copies of generator notice and necessary information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | Copies of: <ul style="list-style-type: none"> <li><input type="checkbox"/> Beneficial use site authorization applications</li> <li><input type="checkbox"/> Ohio EPA Beneficial Use Site Authorization letters</li> <li><input type="checkbox"/> Copies of all Beneficial User Notices and Necessary Information</li> <li><input type="checkbox"/> Records showing that Class B biosolids were not stored ≥90 days at the beneficial use site</li> </ul>                                                                                                                                                                                                                                                                                                                                                |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | Beneficial use site records <ul style="list-style-type: none"> <li><input type="checkbox"/> Soil pH for each beneficial use site</li> <li><input type="checkbox"/> Soil phosphorus for each beneficial use site</li> <li><input type="checkbox"/> Agronomic rate calculations for each beneficial use site</li> <li><input type="checkbox"/> Forecast/actual precipitation data</li> <li><input type="checkbox"/> Subsurface tile monitoring records (if applicable)</li> <li><input type="checkbox"/> Sign placement records for all beneficial use sites</li> <li><input checked="" type="checkbox"/> Date and quantities of beneficial use</li> <li><input checked="" type="checkbox"/> The total amount of acreage on the beneficial use site where beneficial use of biosolids occurred</li> </ul> |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <input type="checkbox"/>                                                                                                                                                                                                                                                  | A description detailing how the agronomic rate is met at each beneficial use site, including how the beneficial use application equipment is calibrated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |
| <b>Comments:</b> <ul style="list-style-type: none"> <li>The majority of PCI's biosolids analytical data and beneficial use records were lost when their former operator left the facility in 2023. Analytical results for metals concentration in sludge, soil</li> </ul> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                  |                                           |                                 |                                  |                                 |                               |                                  |                               |                                     |                                   |                                           |                                                  |                                           |                                          |  |  |  |

analytical results for beneficial use sites, site authorization letters and applications, forecast records, beneficial user and generator Notice and Necessary Information forms, SOPs, and any records regarding beneficial use of biosolids in 2023 were unavailable.

- Gibson Lime Service confirmed that 373.1 wet tons of sludge from PCI were applied to sites 65-00177, 65-00178, and 65-00179 in 2023. No records were available for these beneficial use events, and they were not reported on the 2023 ASR.
- ARCs were provided for 2022; however, the total phosphorus in sludge, expected crop yield, and crop nitrogen requirements were not listed, therefore, an agronomic rate could not be calculated.
- In 2022, signs were posted three days prior to beneficial use instead of one week as required. Signs were posted for 30 days following the final date of beneficial use.

## 10. Monitoring Information

|                                                                                                                                |                                                                                                                                                          |                                        |  |
|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|--|
| Where does biosolids sample collection occur?                                                                                  | SOUR test samples are collected from the aerobic digester. Total solids samples are collected from the digester and the dewatered biosolids storage pad. |                                        |  |
| Who collects the biosolids samples?                                                                                            | Jim Lyons                                                                                                                                                |                                        |  |
| What are the biosolids sample preservation/shipping procedures?                                                                | Samples have not been sent to a laboratory since 2022. No sample preservation/shipping SOP was available.                                                |                                        |  |
| Is a chain of custody utilized?                                                                                                | Records are not available                                                                                                                                |                                        |  |
| At what frequencies are biosolids samples collected?                                                                           | <input checked="" type="checkbox"/> Annually                                                                                                             | <input type="checkbox"/> Semi-Annually |  |
|                                                                                                                                | <input checked="" type="checkbox"/> Quarterly                                                                                                            | <input type="checkbox"/> Monthly       |  |
|                                                                                                                                | <input type="checkbox"/> Other:                                                                                                                          |                                        |  |
| <b>Comments:</b>                                                                                                               |                                                                                                                                                          |                                        |  |
| <ul style="list-style-type: none"> <li>• Total solids samples are analyzed each time the belt filter press is used.</li> </ul> |                                                                                                                                                          |                                        |  |

## 11. Analytical Information

| Y                                                                                                                                                                                     | N                        | Analytical Information                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/>                                                                                                                                                   | <input type="checkbox"/> | Does the generator perform in-house analyses? If yes, list in-house analyses in comments.                             |
| <input checked="" type="checkbox"/>                                                                                                                                                   | <input type="checkbox"/> | Does the generator utilize a contracted laboratory to perform analyses? If yes, list contracted analyses in comments. |
| Provide the contracted laboratory information:                                                                                                                                        |                          |                                                                                                                       |
| <b>Lab Name</b>                                                                                                                                                                       |                          | MASI Environmental Laboratories                                                                                       |
| <b>Address</b>                                                                                                                                                                        |                          |                                                                                                                       |
| <b>Contact Name</b>                                                                                                                                                                   | <b>Phone</b>             | <b>Email</b>                                                                                                          |
| Bridget Troesch                                                                                                                                                                       | 614-873-4654             |                                                                                                                       |
| <b>Comments:</b>                                                                                                                                                                      |                          |                                                                                                                       |
| <ul style="list-style-type: none"> <li>• Total solids samples are analyzed in-house. If biosolids are beneficially used in 2025, the SOUR test will be conducted in-house.</li> </ul> |                          |                                                                                                                       |

## 12. Method Verification

| Y                                                                                                                                                         | N                        | N/A                                 | Method verification (If no, describe in the comments)                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Fecal Coliform - Is Standard Methods 9221E or 9222D, EPA Method 1680 or 1681 utilized?                                                                                              |
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Are fecal coliform samples analyzed within eight hours of collection? If not, describe in comments.                                                                                 |
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Enteric Viruses - Is ASTM D 4994-89 utilized?                                                                                                                                       |
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Helminth ova - Is Yanko, W.A "Occurrence of Pathogens in Distribution and Marketing Municipal Sludges" utilized?                                                                    |
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Salmonella sp. Bacteria - Is Standard Methods 9260D, Kenner, B.A and H.P. Clark, "Detection and Enumeration of Salmonella and Pseudomonas aeruginosa," or EPA Method 1682 utilized? |
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Inorganic Metals - Is SW-846 utilized (6010D, 7061A, 7000B, 7470A, 7471B)?                                                                                                          |
| <input type="checkbox"/>                                                                                                                                  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Specific Oxygen Uptake Rate - Is Standard Methods 2710B utilized?                                                                                                                   |
| <input checked="" type="checkbox"/>                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/>            | Total, Fixed, and Volatile Solids - Is Standard Methods 2540G utilized?                                                                                                             |
| <b>Comments:</b> <ul style="list-style-type: none"> <li>The only laboratory records available were the total solids analytical sheets and SOP.</li> </ul> |                          |                                     |                                                                                                                                                                                     |

### Inspection Photos



Figure 1. Influent bar screen. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institute WWTP, NPDES #4PP00003.



Figure 2. Two new mechanical fine screens. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 3. Band screen. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 4. South oxidation ditch. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 5. North oxidation ditch. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 6. One of two clarifiers. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 7. Clarifier Weir. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 8. One of two anoxic tanks. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 9. Sludge thickener. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 10. Sludge thickener weir. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 11. Aerobic digester. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 12. Aerated sludge holding tank. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 13. Belt filter press. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.



Figure 14. Biosolids storage pad. Photo taken 4/10/2025 by Whitney White. Pickaway Correctional Institution WWTP, NPDES #4PP00003.