



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 15, 2010

Re: Meigs County
Pomeroy WWTP
Compliance Inspection
NPDES Permit No. 0PB00032*HD
Correspondence (PWW)

Mayor and Council
Village of Pomeroy
320 East Main Street
P.O. Box 666
Pomeroy, Ohio 45769

Mayor and Council:

On June 8, 2010, Tim Campbell and I visited Pomeroy's wastewater treatment plant to discuss ongoing compliance issues. At that time, we met with Mayor Musser, Mr. Paul Hellman, Ms. Lila Follett, and Mr. Mitch Altier (consultant). The purpose of the visit was to review major deficiencies at the plant and in the collection system and to make recommendations for prioritizing these. Currently, the plant operates under NPDES Permit 0PB00032*HD.

The following priority items must be evaluated and corrective action implemented:

1. **Back-up power capabilities**

Currently, the Village of Pomeroy does not possess a means to provide standby power to the main lift station of the treatment plant during power failure or other emergency situations. This requirement was detailed in a September 11, 2009 notice of violation and again during an actual power outage event on May 18, 2010. During the May 18 visit, it became apparent that not only were back-up power capabilities still non-existent, but that it was also going to require significant work to meet this requirement.

Within 30 days of the date of this letter, the Village of Pomeroy must complete modifications to a) the main lift station and b) the wastewater treatment plant in order to allow back-up generators to power both facilities in the event of another prolonged power outage.

In addition to providing this capability to the main lift station, the Village must make necessary modifications to the main lift station controls to allow operators to manually switch and troubleshoot pumps without having to perform a confined space entry. Currently, operators must have assistance from other village employees in order to enter into the lift station, a time-consuming and potentially dangerous task.

2. **Plant staffing requirements**

The plant is required to be staffed five days per week, for a minimum of 20 hours by a certified Class II operator. It is our understanding that Ms. Follett, Class I operator, failed to pass her exam allowing her to become a Class II operator. Therefore, she cannot act as the plant's operator in responsible charge (ORC).

NPDES permit 0PB00032*HD Part II.A.2 requires that "A form must be completed for each operator of record and if the person is also the operator of record of the collection system, a form must be completed for the treatment facility and another form completed for the collection system." Please provide this required documentation within 30 days of the date of this letter designating a certified Class II operator as the ORC.

The appropriate form for making this notification can be found at:

http://www.epa.ohio.gov/portals/28/documents/opcert/Operator_of_Record_Notification_Form.pdf

Pomeroy must also ensure that appropriate staffing records are maintained on-site as required by NPDES permit 0PB00032*HD Part II.A.3.

3. **Combined sewer monitoring**

Pomeroy operates a combined collection system which discharges mixed storm water and untreated sewage during certain precipitation events, called combined sewer overflows (CSOs). Pomeroy's NPDES permit requires that CSOs be monitored and occurrences and overflow volumes be reported.

During a July 2009 inspection, it was determined that the operator was not monitoring CSOs or correctly reporting their occurrences. This was cited as a violation in a September 11, 2009 letter to the village and the following action was required:

"Pomeroy must immediately install devices in all CSO discharge structures that can be used to accurately determine if CSOs are occurring. At a minimum, the devices must provide visible and audible alarms that will remain active for the duration of the CSO event. Ideally, the device

should have telemetric capabilities so that the CSO can be identified and recorded through the plant's computer system. Within 30 days of the date of this letter, please submit documentation that this equipment has been installed and is functioning properly. All equipment must be maintained and in proper working order until such a time that the Village's long term control plan has been fully implemented and CSOs no longer occur."

During the May 18, 2010 visit, Ms. Follett and Mr. Hellman were asked CSO monitoring methods. Neither Ms. Follett nor Mr. Hellman were able to find the CSO outfalls on the bank of the Ohio River. During the June 8 visit, it was apparent that CSOs are, in fact, not being monitored at all, which is a violation of NPDES permit 0PB00032*HD.

Please provide, within 30 days of the date of this letter, details of Pomeroy's CSO monitoring program, including a) how the operator identifies an activated CSO, b) how the operator calculates CSO volumes, and c) what equipment has been installed to allow for accurate monitoring.

4. **Combined sewer identification**

Pomeroy's NPDES permit 0PB00032*HD Part II.V states the following:

"Not later than 4 months from the effective date of this permit, the permittee shall post a permanent marker on the stream bank at each outfall that is regulated under this NPDES permit and discharges directly to the Ohio River. This includes final outfalls and combined sewer overflows. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible. If the outfall is normally submerged the sign shall indicate that. If the outfall is a combined sewer outfall, the sign shall indicate that untreated human sewage may be discharged from the outfall during wet weather and that harmful bacteria may be present in the water."

The Village of Pomeroy is not currently in compliance with this requirement. Please provide, within 30 days of the date of this letter, documentation that the requirement is being met.

5. **Lift station inspection program**

It has become apparent from speaking with past and current operators that the Village of Pomeroy does not have an adequate lift station inspection program in place. The undetected failure of any lift station operated by the Village of Pomeroy will result in a sanitary sewer overflow (SSO), which is an illegal discharge.

Though all lift stations are equipped with a visible alarm, these often times fail and can result in a false appearance of proper lift station operation. The Village of Pomeroy must immediately develop and implement a lift station monitoring program. At a minimum, each lift station operated by the village must be observed daily with physical inspection and testing of the alarm system and breakers. The results of the testing/observations must be recorded in a dedicated log book (one for each lift station), along with the employees name responsible for the testing/observations. Please provide details, within 30 days of the date of this letter, of the village's final lift station monitoring program.

The following list of items should be addressed as soon as possible. Please provide a schedule for replacement or repair work:

6. **Plant air supply system**

The air mains, manifolds, and diffusers must be evaluated and repaired or replaced in order to achieve efficient wastewater treatment. Two of the four blowers are also currently out of service. These both must be repaired or replaced.

7. **Clarifier "scum troughs"/skimmers**

The existing scum troughs are severely corroded and leaking and need to be replaced. The village currently has replacements ready to install. Replacement will allow for more efficient plant operation.

8. **Plant valves**

Most, if not all, valves at the plant are corroded and impossible to operate. These valves are essential for efficient plant operation. The operator currently has no way to balance the system in order to reduce or prevent effluent violations.

Please provide the information requested above within 30 days of the date of this letter. Also, please provide responses to all other items in the September 11, 2009 letter. If you have any questions, please contact me at (740) 380-5447.

Sincerely,



Michael Yandrich
District Representative
Division of Surface Water

MY/dh