



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

February 12, 2010

Re: Lawrence County
City of Ironton
Compliance Sampling
Inspection (CSI)
Correspondence (PWW)

Mayor and Council
City of Ironton
301 South Third Street, P.O. Box 704
Ironton, Ohio 45638

Dear Mayor and Council:

On October 19 and 20, 2009, a Compliance Sampling Inspection (CSI) was conducted at the City of Ironton's wastewater treatment plant. The purpose of the inspection was to determine the City's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were John Haskins, representing the City and Joann Montgomery and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. Wastewater samples were collected as part of the inspection. A copy of my inspection report and sample results are attached.

As a result of my inspection, I have the following comments:

1. The plant is in the process of updating pumps for the trickling filter and influent pump station. Please update this office on the status of the pump upgrades.
2. The City is in the process of re-lining the entire collection system. The re-lining project also includes raising manholes to grade, re-lining of the manholes, cleaning and repair and/or replacing sewers.
3. The City has been meeting the Nine Minimum Controls as required by its NPDES Permit, however, the City needs to ensure the street sweeper can be operated in all areas of the City where combined sewer are located, i.e., no parked cars on the street, piling of leaves and removal of tree branches, etc. Please inform this office how the City is accomplishing this.
4. The City is beginning to start design work on the separation of the combined sewer areas in the North Ironton area. Please update this office on the design of this project.
5. In response to sewer backups, which occurred in the South Ironton area, the City is installing back-flow preventers to help prevent this problem from occurring

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)			X	
d. Flows and loadings conform with NPDES permit			X	
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in NPDES Permit		X		
e. Permittee is meeting compliance schedule	X ¹			

Comments: ¹ City has submitted a Long-Term Control Plan for separation of the sanitary sewers.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>1</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: <u>IV</u>	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X ¹			

Comments: ¹ City has a combined sewer collection system.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>75</u> %	X			
b. Any collection system overflows since last inspection (CSO <u>X</u> SSO <u> </u>)	X			
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented	X			
e. CSOs monitored and reported in accordance with permit	X			
f. Portable pumps used to relieve system		X		
g. Lift station alarm systems provided and maintained	X			
h. Are lift stations equipped with permanent standby power or equivalent	X			
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	X			
j. Any complaints received since last inspection of basement flooding	X ¹			
k. Are any portions of the sewer system at or near capacity	X			

Comments: ¹ South Ironton area had numerous residential basement flooding in June/July.

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): 10/7/93 Submitted Date
06-211PW Approval Number
 Not submitted
 N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current	X			
c. Sludge adequately disposed (Method: <u>Landfill</u>)	X			
d. If sludge is incinerated, where is ash disposed of?			X	
e. Is sludge disposal contracted (Name: <u>Allied Waste</u>)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance				Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained			X			
g.	Satisfactory calibration and maintenance of instruments and equipment			X			
h.	Adequate records maintained			X			
i.	Results of latest U.S. EPA quality assurance performance sampling program:						
	Date:	<u>DMR-QA 2009</u>	<u>X¹</u>	Satisfactory			
				Marginal			
				Unsatisfactory			

Comments: ¹pH rated "Not Acceptable". City has replaced pH probes.

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	Slight	Slight	None	None	

Comments:

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments:

TABLE I

OHIO EPA FIELD DATA

FACILITY: Ironton WWTP

DATES SAMPLED: October 19 & 20, 2009

<u>Station</u>	<u>Date</u>	<u>Time</u>	<u>Parameter</u>	<u>Units</u>	<u>Value</u>	<u>Permit Limits</u>
001	10/19	1100	pH	S.U.	6.84	6.5-9.0
			Temperature	°C	16.66	-
			Dissolved oxygen	mg/l	7.91	-
			Conductivity	umhos/cm	695	-
			Chlorine residual	mg/l	0.01	0.038
001	10/20	1035	pH	S.U.	6.63	6.5-9.0
			Temperature	°C	17.89	-
			Dissolved oxygen	mg/l	6.83	-
			Conductivity	umhos/cm	707	-
			Chlorine residual	mg/l	0.01	0.038

TABLE II

COMPLIANCE SAMPLING DATA

FACILITY: Ironton WWTP

DATES SAMPLED: October 19-20, 2009

STATION	T*	PARAMETER	UNITS	<u>OHIO EPA</u>		<u>ENTITY</u>		<u>PERMIT LIMITS</u>	
				CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.	CONC.	(KG/D) LOAD.
001	C	Susp. solids	mg/l	29	172	23	136	45	290
	C	Diss. solids	mg/l	450	-	459	-	-	-
	C	CBOD ₅	mg/l	11	65.2	9	53.3	40	257
	G	Fecal coliform #/100 ml		20	-	40	-	2000	-
	C	Ammonia	mg/l	6.71	-	7.4	-	-	-
	C	Nitrate-nitrite	mg/l	8.9	-	-	-	-	-
	C	TKN	mg/l	10.1	-	-	-	-	-
	G	Oil & Grease	mg/l	lab accident	-	-	-	10 max.	-
	C	Nickel, tot.	ug/l	5.0	-	-	-	-	-
	C	Copper, tot.	ug/l	18.2	-	-	-	-	-
	C	Cadmium, tot.	ug/l	<0.2	-	-	-	-	-
	C	Lead, tot.	ug/l	4.0	-	-	-	-	-
	C	Chromium, tot.	ug/l	<2.0	-	-	-	-	-
	C	Mercury, tot.	ug/l	<0.2	-	-	-	-	-
	C	Zinc, tot.	ug/l	43	-	-	-	-	-
	G	Chrom. hex.	ug/l	<10	-	-	-	-	-
		Flow, tot.	MGD			1.565			

*SAMPLE TYPE: G=grab; C=composite