



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

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

May 30, 2008

**Re:** Lawrence County  
City of Ironton  
Compliance Evaluation  
Inspection (CEI)  
Correspondence (PWW)

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

Dear Mayor and Council:

On April 23, 2008, a Compliance Evaluation Inspection (CEI) 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 Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected as part of the inspection. A copy of my inspection report is attached.

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

1. The street sweeper has been out of service due to mechanical problems during March 2008. The City needs to keep the street sweeper in operation at all times and repairs should be completed immediately. The street sweeper needs to be operated on an on-going basis to help the City meet Nine Minimum Controls. Please inform this office on the status of the street sweeper operation.
2. 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 and removal of tree branches, etc. Please inform this office how the City is accomplishing this.
3. The plant is in the process of obtaining a new generator which will replace the old generator and be capable of operating the entire plant. Please inform this office when the generator will be replaced.

4. According to Mr. Haskins, a new contractor will be doing the sewer cleaning for the City. The City needs to continue with the sewer cleaning on a regular basis as has been done in the past few years as this is part of the Nine Minimum Controls. Please update this office on how much of the collection system has been completed.
5. The City is proposing to separate its collection system to address the combined sewer overflows (CSOs). The City needs to work on removing inflow/infiltration (I/I) in the separate sewer areas of the collection system and areas being separated. Failure to address properly I/I in the separate areas may lead to sanitary sewer overflows (SSOs) which are violations of the City's NPDES Permit.
6. The City should be 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.
7. Ohio EPA has been contacted in regards to a new development being located on County Road 181, Hog Run. Ohio EPA will be instructing the owners to contact the City in regards to providing sanitary wastewater service to this development. The City will need to talk with the developer and determine if adequate capacity is available in the collection system. Typically, the City will take over operation of the sanitary wastewater collection system for maintenance and operation after one year after construction and installation by the developer.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

In conclusion, the City of Ironton appeared to be in compliance with its NPDES Permit at the time of the inspection.

Please respond to the above Comments #1-6 in writing to this office within 20 days of receipt of this letter.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Wells". The signature is stylized with a large initial "S" and "W".

Stephen Wells  
District Representative  
Division of Surface Water

SW/dh

Enclosure

c: John Haskins, Superintendent

# NPDES Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00007*JD	OH0025852	April 23, 2008	C	S	1

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Ironton Wastewater Treatment Plant 810 North Second Street Ironton, Ohio 45638	12:05 p.m.	August 1, 2007
	Exit Time	Permit Expiration Date
	2:00 p.m.	July 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
John Haskins, Superintendent	(740) 532-8425
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council City of Ironton 301 South Third Street P.O. Box 704 Ironton, Ohio 45638	(740) 532-3833

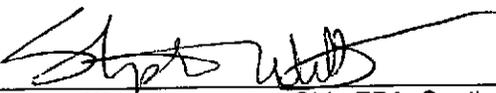
## C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>S</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>-</u> Other
<u>S</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

## D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.

  
 Stephen Wells, Inspector, Ohio EPA, Southeast District Office

5/30/08  
 Date

  
 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

5/30/08  
 Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

**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				
e. Permittee is meeting compliance schedule	X <sup>1</sup>			

Comments: <sup>1</sup> 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: IV	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 <sup>1</sup>			

Comments: <sup>1</sup> 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 <sup>1</sup>			
k. Are any portions of the sewer system at or near capacity	X			

Comments: <sup>1</sup> 2500 Block of 4<sup>th</sup> Street.

## 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>Rumpke</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	NE
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: _____		_____ Satisfactory			
		_____ Marginal			
		_____ Unsatisfactory			

Comments:

**J. EFFLUENT/RECEIVING WATER OBSERVATIONS**

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

Comments:

**K. MULTIMEDIA OBSERVATIONS**

	Yes	No	N/A	NE
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: