



State of Ohio Environmental Protection Agency

Southeast District Office

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

April 5, 2007

Re: Adams County
Village of West Union
Compliance Evaluation Inspection
Ohio EPA Permit No. OPC00019*ED
NPDES Permit No. OH0028088
Correspondence (PWW)

Mayor and Council
Village of West Union
517 North Market Street
West Union, Ohio 45693

Dear Mayor and Council:

On Thursday, March 15, 2007, Aaron Wolfe and I conducted a compliance evaluation inspection at the West Union Waste Water Treatment Plant (WWTP). Duane Kirk represented West Union and assisted us during the inspection. The purpose of the inspection was to determine if the treatment plant was meeting the terms and conditions set forth in its NPDES permit.

The following were concerns that arose during the inspection.

1. At the time of my inspection, the digester was still out of operation. Accumulated rain water had been pumped out of the digester, but the estimated 300 cubic yards of grit remained in the digester. The imhoff tank, which is being used as a temporary digester until the main digester is properly cleaned, was full. The sludge in the imhoff tank was thickened to the point that no more clean water could be decanted and there were no sand drying beds available on which to put the sludge. Furthermore, with warmer spring weather approaching, the trickling filters will begin sloughing the old growth. Without digester space for the large amounts of solids associated with the trickling filter sloughing, effluent limitations could be violated and/or operational and maintenance issues could arise. Failure to restore the digester to proper operation could result in enforcement action by the Ohio EPA pursuant to Ohio Revised Code (ORC) 6111.

On March 27, 2007, I met with Mayor Kirker, Richard Potter (Village Administrator) and the Waste Water Commission from Council to follow-up on the village's progress with the digester. At the time of the meeting, the digester was still unrepaired and out of service. Richard Potter stated that half of the sludge from the imhoff tank had been pumped to the Wedgewater beds for dewatering. During the meeting I reiterated the critical nature of the digester situation and the failure of the village to even begin to remedy the issue in the six months they have been aware of the problem. After explaining the possible enforcement actions that the Ohio EPA was willing to begin if action was not taken in the near future, the village officials present and I came to an agreement that within two weeks (14 days) of the meeting (March 27, 2007) full

removal of the grit/sludge remaining in the digester would begin. The agreement was, if possible, a portion (or all) of the remaining grit/sludge in the digester would be removed to the sludge drying beds during the initial two weeks (March 27 to April 10, 2007) in order to save the village some money. By April 10, 2007, the village was to begin expedited removal of the remaining grit/sludge from the digester directly to a landfill.

It is imperative to quickly clean the digester and restore it to proper operation in order to adequately manage solids at the plant. Please refer to my letter dated November 17, 2006 for requirements for the proper cleaning and reactivation procedure.

2. At the time of the inspection, Duane had discovered a broken telescoping valve at the head of the west primary clarifier and was actively dewatering the clarifier in order to repair the valve. Please confirm that this valve was appropriately repaired and the clarifier was put back in operation.
3. The grit removal at the head works of the plant was still operating inadequately. At the time of the inspection Duane had already filled a 50 gallon trash can and a 5 gallon bucket with rags caught on the bar screen at the primary clarifiers. As stated in my letter dated November 17, 2006, a properly operating grit removal at the head works of the plant is an important treatment unit and will save the operator time and keep grit out of the digester.
4. The stairs leading down to the final effluent sampling station were in a state of disrepair and unsafe for WWTP staff to use. The stairs should be repaired as soon as possible to ensure the safety of your staff and adequate access to the final effluent.
5. The metal railing surrounding the primary clarifiers was corroded and in most cases completely rotted away from the base. When shaken the railing was very unstable and felt as if it could break very easily. This is not acceptable for maintaining the safety of your staff. The railing around the primary clarifiers should be replaced immediately with corrosion resistant materials.

A copy of our inspection form is enclosed with this letter. Please submit a written response to the aforementioned comments within 10 days of receipt of this letter. If you have any questions or comments, please contact me at (740) 380-5226.

Sincerely,



Patrick Hudnall
District Representative
Division of Surface Water

PH/dh

Enclosure

c: Richard Potter

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPC00019*ED	OH0028088	March 15, 2007	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
West Union WWTP	10:00 a.m.	September 1, 2006
	Exit Time	Permit Expiration Date
	11:00 a.m.	August 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Duane Kirk, Operator	(937) 544-5217
Name, Address and Title of Responsible Official	Phone Number
Village of West Union	(937) 544-5217

C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached inspection letter.



 Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

4/4/07

 Date



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

4/5/07

 Date