



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 6, 2011

Re: Athens County
The Plains SD WWTP
NPDES Permit 0PJ00005*GD
Reconnaissance Inspection
Correspondence (PWW)

Athens County Board of Commissioners
15 South Court Street
Athens, Ohio 45701

Dear Ladies and Gentlemen:

On September 24, 2010, I conducted a reconnaissance inspection of The Plains Wastewater Treatment Plant. The purpose of the inspection was to inspect the sewage collection system in the wake of the tornado that hit the area on September 16, 2010. Information about the collection system was used in the renewal of the NPDES permit. A copy of the inspection report form is attached. No wastewater samples were taken.

As a result of the inspection and a file review I have the following comments:

1. Your NPDES permit expired July 31, 2010, but remains in effect since the renewal application has been submitted. The NPDES renewal permit has been drafted and will be sent to you for review. It is important that you review the draft permit and provide comments if necessary.
2. It was evident from the inspection that sections of the sewer system experience excessive inflow and infiltration (I/I). This is clean water that enters the sanitary sewers through cracks and joints in the sewer pipe, illegal connection of clean water sources such as roof downspouts and foundation drains, or cross connection between storm sewers and sanitary sewers. All of these conditions lead to problems such as basement flooding, manholes discharging and high flows at the wastewater plant that result in operational problems, including washing solids into the river.

The draft NPDES permit has 3 new sections that address I/I:

- a. A new outfall has been added for reporting number of occurrences during the month that a discharge occurs from the collection system (i.e., manhole discharge, sewage in a basement, pump station failure, etc.).
- b. The reporting process for these instances has been clarified in Part II of the NPDES permit, outlining details of the reporting process.

- c. A compliance schedule has been added to the permit, requiring your facility to create an Infiltration and Inflow Control Plan, to be submitted within a year of the issuance of the permit.

All discharges from the sewer system must be reported to Ohio EPA in accordance with the NPDES permit.

3. As mentioned on page 3 of 4 in Jacob Howdyshell's 2/22/10 inspection letter, your WWTP will need to be evaluated for compliance with the new sludge screening requirements, for which the deadline has changed since Jacob's letter. Specifically, rule 3745-40-02 (C)(3)(a) states:

"By July 1, 2015, prior to the beneficial use of biosolids, influent wastewater and septage, or sewage sludge at a treatment works must be treated by a process such as physical screening or another method to significantly remove manufactured inerts. Meeting this requirement may be accomplished by either of the following:

- (i) Screening influent wastewater and influent septage through a bar screen with a maximum aperture of five-eighths inch (1.59 centimeters) designed to screen the average daily design flow;
- (ii) Screening all biosolids through a bar screen with a maximum aperture of five-eighths inch (1.59 centimeters) prior to beneficial use; or
- (iii) Obtaining approval from the director for an alternative method that achieves a removal rate equal to or greater than that achieved by the screening standards in paragraph (C)(3)(a)(i) or (C)(3)(a)(ii) of this rule."

The County Commissioners should begin the evaluation to determine the best method of compliance with this requirement for this WWTP.

No response to this report is required at this time. If you have any questions, please contact me at your convenience at (740) 380-5284.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

c: Rich Kasler, Supt., The Plains Water and Sewer District

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PJ00005*GD	OH0050580	September 24, 2010	R	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
The Plains Wastewater Treatment Plant 11308 Jackson Drive The Plains, Ohio 45780	9:30 a.m.	August 1, 2005
	Exit Time	Permit Expiration Date
	12:00 p.m.	July 31, 2010

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Rich Kasler, Supt.	(740) 593-7146
Name, Address, & Title of Responsible Official	Phone Number
Athens County Commissioners 15 S. Court Street Athens, Ohio 45701	(740) 593-7146

C. AREAS EVALUATED DURING INSPECTION

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

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

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

1. Collection System - system has Infiltration and Inflow problems.
2. Sludge storage/disposal - facility will need to upgrade to comply by 2015 with Ohio's sewage sludge regulations.



 Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

5/6/11

 Date



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

5/6/11

 Date