



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 Korteski, Director

August 8, 2008

Re: Athens County
City of Nelsonville
Ohio EPA Permit No. OPC00006
NPDES Permit No. OH0020541
Correspondence (PWW)

City Council
City of Nelsonville
211 Lake Hope Drive
Nelsonville, Ohio 45764

Dear Council:

On Tuesday, July 15, 2008, Cynthia Yandrich and I conducted a compliance evaluation inspection (CEI) at the Nelsonville Wastewater Treatment Plant (WWTP). Phil Smith (WWTP Operator) represented the City of Nelsonville and assisted us during the inspection. The purpose of the inspection was to determine compliance with terms and conditions set forth in the NPDES Permit.

During the inspection, the following concerns/comments arose.

1. As stated in the May 21, 2007 inspection letter, Inflow/Infiltration (I/I) was and continues to be a serious concern with regard to the Nelsonville sanitary sewer collection system and WWTP. While Phil stated that several small sources of I/I have been located and eliminated in the past year, the continuing existence of the Columbus Street Sanitary Sewer Overflow (SSO) is evidence that large sources of I/I still exist in the system.

The Ohio EPA reiterates the recommendation to utilize the I/I fund discussed in the previous letter to develop and implement a plan to identify and eliminate as many sources of I/I as possible. Please be aware that your current NPDES Permit contains a schedule of compliance (Part I, C.) that states, in part 2. d., "All work necessary for the reduction of I/I into the collection system necessary to eliminate collection system overflows and reduce peak wet weather flows at the treatment plant shall be fully completed by the expiration date of this permit."

Also of concern is the lack of a sanitary sewer collection system/drinking water distribution system supervisor for the City of Nelsonville. Some time ago this position was eliminated, pushing the respective responsibilities to Phil Smith and Bruce Stumbo. From conversations with Phil, he has little to no time to devote to

investigating/repairing I/I sources after fulfilling all his duties as WWTP Operator along with supervising routine collection system maintenance. The creation of a position for sanitary sewer collection and water distribution system supervisor would ensure adequate time and attention is given to I/I related work as well as maintenance of the systems. This position may be required in order to complete the work required in Part I, C. of your NPDES Permit.

2. Phil stated that all the necessary equipment was available to perform scheduled preventative maintenance on the digester. He was waiting for the sewage sludge hauler to get the time and land to drain the digester. Please inform this office of the completion of this work.
3. Phil stated that all new telescoping valves, replacements for the broken and old telescoping valves, were on-site and waiting to be installed. The contractor hired for the job had canceled the previous week and not shown up the week of the inspection. Please inform this office of the completion of this work.
4. After reading your October 26, 2007 letter and speaking with Phil on several occasions regarding Part I, C., part 1. of your NPDES Permit, the Ohio EPA requires the following actions be taken to satisfy this permit requirement with the existing effluent flow meter.
 - The effluent composite samples be flow proportionate based on the effluent flow meter.
 - Report flow rate from the effluent flow meter as flow rate for outfall 001.
 - During such times that the effluent flow meter is inundated or otherwise ineffective due to flood waters, report the days total influent flow for the flow rate at outfall 001, with an explanation on the monitoring report.
 - During such times that the effluent flow meter is inundated or otherwise ineffective due to flood waters, manually take flow proportionate composite effluent samples, if required on that day, according to Part II of your NPDES Permit, with an explanation on the monitoring report.
5. During the inspection, Phil stated that there was no standby power available for the Nelsonville WWTP, and that the City was considering the installation of a permanent generator at the WWTP. WWTPs are required to have an alternate source of electric power or pumping capacity, according to section 56.1 of 10 States Standards. As part of your response, please inform this office of the City's plans to install a permanent generator at the Nelsonville WWTP.

Please respond, in writing, within thirty (30) days of receipt of this letter. Your response should address each of the above 4 items. Feel free to contact me at (740) 380-5226 with any questions or comments.

Sincerely,



Patrick Hudnall
District Representative
Division of Surface Water

PH/dh

Enclosure

c: Joe Scherrer, City Administrator
c: Phil Smith, Operator

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PC00006*HD	OH0020541	July 15, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Nelsonville WWTP 15751 State Route 33 Nelsonville, Ohio 45764	9:45 AM	12/1/2007
	Exit Time	Permit Expiration Date
	11:30 AM	11/30/2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Phil Smith, Operator	740-753-3023
Name, Address and Title of Responsible Official	Phone Number
City of Nelsonville 211 Lake Hope Drive Nelsonville, Ohio 45764	740-753-1314

C. AREAS EVALUATED DURING INSPECTION

<u> S </u> Permit	<u> M </u> Flow Measurement	<u> N/A </u> Pretreatment
<u> S </u> Records/Reports	<u> S </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> 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

8/11/08

 Date



 Timothy Campbell, Reviewer, Ohio EPA, Southeast District Office

8/11/08

 Date

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 <u>0PC00006*HD</u>				
e. Permittee is meeting compliance schedule	X			

Comments: a. Columbus Street SSO occurred 3 times since last inspection

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u> </u> Dual Feed <u> </u>		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> 10 hr/day	X			
e. Operator holds unexpired license of class required by permit Class: <u> III </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 <u> </u> on MORS <u> </u> 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

Comments: a. City is considering installing a generator at the plant
 g. Chlorine system failure – temp system setup while system was repaired
 Operating at time of inspection.
 k. I/I

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0</u> %				
b. Any collection system overflows since last inspection (CSO <u> </u> SSO <u>X</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			
k. Are any portions of the sewer system at or near capacity	X			

Comments: h. 4 standby pumps and floater truck
j. Jan and Feb flooding in area of Adams Street reconstruction project – problem fixed
k. The area upstream of the Columbus St SSO

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan _____ Submitted Date
_____ Approval Number
_____ Not submitted
_____ N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current	X			
c. Sludge adequately disposed (Method: <u>Land Application</u>)	X			
d. If sludge is incinerated, where is ash disposed of? _____		X		
e. Is sludge disposal contracted (Name: <u>Brooks Farms</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:	N/A		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	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		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: