



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

May 21, 2007

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 Monday, April 9, 2007, Cynthia Yandrich and I conducted a compliance evaluation inspection (CEI) at the Nelsonville Wastewater Treatment Plant (WWTP). Phil Smith (WWTP Operator) and Mark Hall (City Administrator) 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. One of the telescoping valves for the primary clarifiers had broken and several of the remaining valves were severely deteriorated. Phil said a replacement for the broken valve had been purchased and was waiting for installation. Please complete the repair of the broken valve as soon as possible and assess the condition of the remaining valves for required maintenance/replacement.
2. After review of the Monthly Operating Report (MOR) data for the time period of January 2005 to January 2007, the following violations of your NPDES Permit occurred. During the months of September 2005, October 2005, November 2005 and December 2005, the Nelsonville WWTP failed to attain 85% removal of Total Suspended Solids (TSS) from the influent waste stream. During the month of January 2005, the Nelsonville WWTP failed to attain 85% removal of Carbonaceous Biochemical Oxygen Demand (CBOD) from the influent waste stream.

There were also the following instances of noncompliance:

Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2005:				
Total Suspended Solids	30D Qty	62.5	75.1	1/1/2005
CBOD 5 day	30D Qty	52	76.1	1/1/2005
Total Suspended Solids	7D Qty	93.7	102	1/15/2005
CBOD 5 day	7D Conc	40	48.	1/15/2005
CBOD 5 day	7D Qty	83.3	237	1/15/2005
April 2005:				
CBOD 5 day	7D Qty	83.3	85.6	4/8/2005
Dissolved Oxygen	1D Conc	5	2.7	4/14/2005
July 2005:				
pH	1D Conc	6.5	6.4	7/14/2005
pH	1D Conc	6.5	6.4	7/22/2005
March 2006:				
Dissolved Oxygen	1D Conc	5	3.9	3/12/2006
April 2006:				
Dissolved Oxygen	1D Conc	5	4.7	4/21/2006
August 2006:				
Dissolved Oxygen	1D Conc	5	4.5	8/1/2006
Dissolved Oxygen	1D Conc	5	4.6	8/4/2006
Dissolved Oxygen	1D Conc	5	4.4	8/6/2006
Dissolved Oxygen	1D Conc	5	4.7	8/7/2006
Dissolved Oxygen	1D Conc	5	4.7	8/8/2006
Total Suspended Solids	7D Conc	45	63.8	8/8/2006
Total Suspended Solids	7D Qty	93.7	121	8/8/2006
Dissolved Oxygen	1D Conc	5	4.6	8/21/2006

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please inform this office, in writing, within thirty days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

- After review of the Monthly Operating Report (MOR) data for the time period of January 2005 to January 2007, the following concern arose. During the referenced time frame, the average monthly flow rate processed by the Nelsonville WWTP was 0.68 million gallons per day (MGD). When compared to the average daily design flow for the WWTP of 0.55 MGD, the Nelsonville WWTP processed an

average of 123% of its design flow during the referenced time period. Furthermore, minimal efforts have been made by the City of Nelsonville to locate new and/or repair known sections of the sanitary sewer which are contributing to the Inflow/Infiltration (I/I) issues.

As a result, this office is considering the recommendation of a connection ban for the City of Nelsonville until such time adequate capacity is available at the WWTP. During my inspection, Phil and Mark informed me that the city had approximately \$600,000 in an account to be used specifically for I/I related work. I strongly recommend that the city use that money to hire a consulting firm familiar with I/I related sewer repair work and rehabilitate as many major sources of I/I as possible. For instance, the sanitary/storm sewer cross-connections documented in a 1982 study of the Nelsonville sanitary sewer collection system performed by Floyd Brown Group. The renewed NPDES Permit for the Nelsonville WWTP will contain a compliance schedule with a timeline for the completion of all I/I work. Failure to meet the set timeline may result in enforcement actions by the Ohio EPA, including civil penalties.

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.

Please inform this office, in writing, within thirty days of receipt of this notification with a description of the actions taken or proposed to correct the I/I issues with the collection system and attain adequate capacity at the WWTP. Your response should include the dates, either actual or proposed, for completion of the actions.

4. During the inspection, Phil mentioned the digester was in need of routine preventative maintenance to ensure the proper operation of the air diffusers in the digester. Given the recent odor complaints received by this office and your office, I recommend the city conduct preventative maintenance on the digester to ensure proper operation.

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: Mark Hall, 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	OH0020541	April 9, 2007	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Nelsonville WWTP	1:15 p.m.	July 1, 2002
	Exit Time	Permit Expiration Date
	2:30 p.m.	June 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Phil Smith, Operator Mark Hall, City Administrator	(740) 753-3023
Name, Address and Title of Responsible Official	Phone Number
City of Nelsonville	(740) 753-1314

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>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>M</u> Sludge Storage/Disposal	<u> </u> Other
<u>U</u> Collection System		

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

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

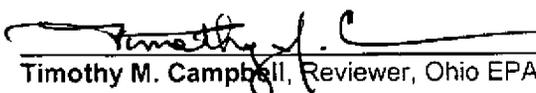
See attached inspection letter.



Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

5/21/07

Date



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

5/21/07

Date