



State of Ohio Environmental Protection Agency

Southeast District Office

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

October 22, 2009

**Re: Guernsey County
Byesville Sewage Treatment Plant
Reconnaissance Inspection
Correspondence (PWW)**

Mayor and Council
221 East Main Street
P.O. Box 8
Byesville, Ohio 43723

Dear Mayor and Council:

On September 22, 2009, I conducted a reconnaissance inspection of the Byesville sewage treatment plant. The purpose of the inspection was to determine the treatment plant's condition following a recent upset at the Island Aseptics facility's pretreatment plant. Ms. Karen Froehlich, plant superintendent was present at the time of my inspection.

Based on the findings of my inspection and the review of our records, I have the following comments:

1. Prior to the plant inspection our office received notification from Island Aseptics that some problems occurred at their facility which may have impacted Byesville's sewage treatment plant. Although notification was received from Island Aseptics, no official notification was received from the Village of Byesville regarding the upset which occurred at the sewage treatment plant. Failure to provide notification of the plant upset is a violation to Part III, Item 12 of your NPDES permit which requires immediate agency notification via phone or e-mail. At the time of my inspection, Ms. Froehlich was instructed to call the hotline number to report the plant upset according to Part III conditions.
2. At the time of the inspection the plant was still receiving some high strength waste which was odorous and a dark black color. The high strength industrial waste had upset the sewage treatment plant as the primary and final clarifiers were both very dark in color with a heavy concentration of suspended solids. The plant effluent was a dark black color and full of suspended solids which had settled in the discharge channel leading to the creek and in the creek as well. The deposition of sludge and discoloration of the creek is a violation of the general effluent limitations listed in Part III, Item 2 of your permit.

3. During the inspection it was discussed with Mr. Tom McVickers, Utilities Director, Randy Mercer, Village Administrator, and Ms. Froehlich that immediate measures should be taken to minimize the impact of the plant's discharge to Wills Creek. Although a noticeable impact to Wills Creek had occurred several days prior to our visit and was still occurring during our visit no emergency measures were put into place until instructed to do so. Please provide a written plan of action describing measures that the village will take in the future to address plant upsets while still maintaining permit compliance.

4. At the time of my inspection the main valve in the sludge digester was inoperable and according to Ms. Froehlich had been out of service for a month. Due to the broken valve the digester could only be used as one tank and no sludge had been wasted for several weeks as efforts were being made to lower the sludge depth to access the valve. During my inspection current and past emphasis was being placed strictly on removal of sludge for land application which created a delayed drawdown of the sludge depth. Although fields may not have been available for the land application of sludge, alternative means of removal such as using the empty equalization tank or sludge drying beds should have been used by the operator to maintain appropriate sludge blankets in the clarifiers. The excessive sludge blankets present in the clarifiers contributed to the excessive sludge deposits in the discharge ditch and in Wills Creek. Please provide a plan of action to repair the valve in a timely manner.

It was very evident at the time of my inspection that inadequate staff and resources at the wastewater treatment plant provided an environment that led to poor communication and lack of a timely reaction to address the plant upset. A discussion with Mr. Kasper who provided some weekend staffing at the facility stated that the plant was upset over the weekend and the effluent was dark. Although an abnormal discharge was noted over the weekend, no immediate efforts were made to resolve the situation or inform the chief operator. Please provide an explanation as to how daily operational and maintenance items are recorded and communicated to all personnel. As a reminder all wastewater treatment plants are required to maintain a bound daily logbook per the operator certification rules. A summary of daily activities completed at the plant should be completed by all personnel present as well as any physical observations made.

Upon discussion with Chief Operator, Karen Froehlich it was noted that she provides dayshift supervision of the plant as well as conducting all required wastewater and water analysis at the lab located off-site. Information provided by Ms. Froehlich did not clearly explain how the plant is staffed and measures that are in place to provide around the clock supervision of the facility. Please provide a detailed staffing report describing the certified operators available for operation and maintenance of the facility as well as the days and hours present. The staffing report should also explain how the new treatment plant will be staffed as current levels will be inadequate since a Class III operator will be required to spend 40-hours a week at the new plant.

Review of the file has shown that routine sanitary sewerage system overflows occur at the High Avenue lift station following a measurable precipitation event. As a reminder all sanitary sewer overflows (SSOs) shall be reported under Station 300 of your NPDES report and on an annual report submitted according to Part II of your permit. The SSOs are violations to Part I, B of your NPDES permit. Please provide an explanation of planned actions to reduce the Infiltration and Inflow (I&I) flows as well as others problems to reduce the SSOs at this lift station. Due to the presence of I&I in the collection system, the plant often receives flows in excess of its hydraulic capacity. Please provide an explanation of any storm flow procedures implemented at the treatment plant to maintain permit compliance during these peak flows and how the equalization tank is used in that process.

Please provide a written response to the concerns addressed above within 14 days upon receipt of this letter. Attached is a copy of my detailed inspection report. If you have any questions, please contact me at (740) 380-5416.

Sincerely,



Jake Greuey
District Representative
Division of Surface Water

JGG/dh

Enclosure

c: Thomas McVickers, Superintendent, Byesville WTP

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PB00004*FD	OH0024287	September 22, 2009	R	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Byesville STP 60806 Opal Lane Byesville, Ohio 43723	1:15 p.m.	January 2, 2007
	Exit Time	Permit Expiration Date
	2:45 p.m.	December 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Karen Froehlich, Plant Superintendent	(740) 685-6239
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council 221 East Main Street PO Box 8 Byesville, Ohio 43723	(740) 685-6562

C. AREAS EVALUATED DURING INSPECTION

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> S Permit | <input type="checkbox"/> N Flow Measurement | <input type="checkbox"/> N Pretreatment |
| <input checked="" type="checkbox"/> S Records/Reports | <input type="checkbox"/> N Laboratory | <input type="checkbox"/> N/A Compliance Schedules |
| <input type="checkbox"/> U Operations & Maintenance | <input type="checkbox"/> U Effluent/Receiving Waters | <input checked="" type="checkbox"/> S Self-Monitoring Program |
| <input type="checkbox"/> M Facility Site Review | <input type="checkbox"/> U Sludge Storage/Disposal | <input type="checkbox"/> Other |
| <input type="checkbox"/> M Collection System | | |

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

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

See attached letter.



Jake Grevey, Inspector, Ohio EPA, Southeast District Office

10/21/09

Date



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

10/21/09

Date