



State of Ohio Environmental Protection Agency

Southeast District Office

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

February 12, 2007

Re: Guernsey County
Rolling Hills WWTP
Compliance Evaluation Inspection
Correspondence (PWW)
Certified Mail 70060100000356200033

Mr. Edward Bischoff
Utility Operator Corporation
9976 Brewster Lane
Powell, Ohio 43065

Dear Mr. Bischoff:

On January 3, 2007, I conducted a compliance evaluation inspection at the Rolling Hills Wastewater Treatment Plant. The purpose of the inspection was to determine compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number 0PW00007*FD and to evaluate wastewater treatment plant performance. Mr. Rusty Baldwin, operator, and Mr. Jim Wing of PUCO were present during the evaluation. Our inspection findings are summarized below.

As a result of the inspection, I have the following comments:

1. I understand one of the two new used pumps has been installed in the influent lift station. The second unit is sitting on the ground beside the lift station. At the time of my inspection, there was sewage present in the valve pit. In addition, there was still evidence of sewage on the ground around the influent lift station/valve pit and in the woods adjacent to the lift station/valve pit. Lastly, the gate for the influent lift station was not locked nor was the cover in place over the valve pit. Both of the aforementioned conditions can result in equipment being vandalized and injury and/or death to unwanted visitors. It will be necessary to secure the influent lift station and valve pit, clean up the remaining sewage on the ground around the lift station/valve pit, in the woods adjacent to the lift station/valve pit and in the valve pit, place lime on the ground in the areas detected with sewage and install the second pump in the influent lift station.

Bypasses of the influent lift station and valve pit are unacceptable unless in accordance with Part III, Item 11 of your permit. In addition, bypasses of the influent lift station and valve pit must be reported in accordance with Part III, Item 12 of your permit. A review of your facility file indicates no bypass of the influent

lift station and valve pit were reported in accordance with your permit. As discussed in numerous telephone calls, bypasses must be reported. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.

2. At the time of my inspection, I observed significant corrosion and deterioration to the piping and valves located in the valve pit and the influent lift station. In addition, the telemetering system for the influent lift station is out of service. It will be necessary to replace all piping, valves, guide rails, pump hoist, electrical equipment and any other equipment that has significant corrosion and deterioration or any items which are no longer working in the influent lift station and valve pit. In addition, please inform this office as to the reasons for the standing sewage present in the valve pit. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.
3. The bar screen is in need of replacement. At the time of my inspection, the screen was sitting on the ground covered with debris next to the flow equalization basin. In addition, raw sewage was observed overflowing the bar screen box and screenings were being stockpiled in five gallon buckets on-site. There was a substantial amount of raw sewage on the decking behind the bar screen box, on the ground around the bar screen box and half way between the bar screen box and the receiving stream. It will be necessary to replace the bar screen, clean up the raw sewage on the decking, on the ground around the bar screen box and half way between the bar screen box and receiving stream. Lastly, lime should be placed on all areas detected with sewage. In addition, it will be necessary to have proper solid waste disposal equipment on-site (dumpster) and trash collection service available at the site for disposal of screenings and trash generated at the site. I understand the operator is currently hauling this solid waste material to Columbus as time and space permits.

Bypasses of the bar screen are unacceptable unless in accordance with Part III, Item 11 of your permit. In addition, bypasses of the bar screen must be reported in accordance with Part III, Item 12 of your permit. A review of your facility file indicates no bypass of the bar screen was reported in accordance with your permit. As discussed in numerous telephone calls, bypasses must be reported. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.

4. The influent and effluent composite samplers are no longer operational. Your permit requires composite samples be collected for suspended solids, ammonia nitrogen, total recoverable nickel, total recoverable zinc, total recoverable cadmium, total recoverable lead, total recoverable chromium, total recoverable copper, total mercury and CBOD₅ at outfall 001. In addition, your permit requires composite samples be collected for suspended solids and CBOD₅ at outfall 601.

Part II, Item E of your permit states "Composite samples shall be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the wastewater flow rate at the time of sampling. Such samples shall be collected at such times and locations, and in such a fashion, as to be representative of the facility's overall performance." Currently, only one grab sample is being collected for influent and effluent composite parameters. Consequently, you are consistently violating these conditions of the permit. You must take immediate actions to collect the samples as required by the permit. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.

5. The influent and effluent flow meters are no longer working, and have not been operational for approximately two years. Your permit requires that the influent and effluent flow rates be monitored continuously. Consequently, you have failed to report the flow rates on a daily basis as required by the permit. It will be necessary to immediately replace the influent and effluent flow meters. In addition, it will be necessary to have the influent and effluent flow meters connected to the influent and effluent composite samplers in order to collect composite samples as defined by Part II, Item E of your permit. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.
6. At the time of my inspection, the water level in the flow equalization basin was approximately 24-inches from the top of the tank. The wastewater was not being aerated. The permanent pump that transfers the effluent from the flow equalization basin to the flow splitter box has been out of operation for some time. A temporary 3-HP sump pump was being used to transfer the wastewater from the flow equalization basin to the flow splitter box after the main pump failed. However, this sump pump has now also failed.

In order to remove the wastewater from the flow equalization basin, a piece of Styrofoam has been placed over the overflow hole to aeration basin one. A small hole has been cut into the Styrofoam to allow a portion of the flow to enter into aeration basin one. Then a portion of the wastewater overflows by gravity into a pipe that transfers the wastewater into aeration basins two and three. This process is unacceptable, since the flow equalization basin cannot be used, as designed, to equalize high flows caused by inflow/infiltration from the collection system. In addition, the raw sewage is not being distributed equally between the three aeration tanks. Lastly, solids are being allowed to settle out in the flow equalization basin which appears to have lead to the blockages in the permanent pump and will eventually lead to odors.

It will be necessary to purchase a pump to replace the permanent unit that has failed in order to properly transfer wastewater to the flow splitter box. In addition, it will be necessary to pump down the wastewater in the flow equalization basin

and remove all of the trash and solids that have accumulated in the bottom of the tank. The material removed from this tank must be disposed at a licensed sanitary landfill. Any blockages in the piping must be removed so that the wastewater can flow out of this treatment unit as designed. Lastly, the guide rails, electrical equipment and pump hoist must be replaced.

Bypasses of the flow equalization basin are unacceptable unless in accordance with Part III, Item 11 of your permit. In addition, bypasses of the flow equalization basin must be reported in accordance with Part III, Item 12 of your permit. A review of your facility file indicates no bypass of the flow equalization basin was reported in accordance with your permit. As discussed in numerous telephone calls, bypasses must be reported. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.

7. At the time of my inspection, the flow splitter box was not in service and wastewater was being bypassed around the treatment unit because the flow equalization pump was out of service. Bypasses of the flow splitter box are unacceptable unless in accordance with Part III, Item 11 of your permit. In addition, bypasses of the flow splitter box must be reported in accordance with Part III, Item 12 of your permit. A review of your facility file indicates no bypass of the flow splitter box was reported in accordance with your permit. As discussed in numerous telephone calls, bypasses must be reported. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.
8. At the time of my inspection, aeration tanks 1 and 3 were dark brown in color while aeration tank 4 was black in color. Aeration tank 4 also had a strong septic odor emanating from it. Since the flow equalization basin and flow splitter box are not being operated as designed, the majority of the raw sewage appears to be flowing into aeration tank 4. Please advised that Ohio EPA received complaints regarding the septic odors from the plant on December 30, 2006 via voice mail and on January 2, 2007. It will be necessary to immediately repair the flow equalization basin in order to properly transfer flow between the three aeration tanks. In addition the weeds growing in aeration tank 1 need to be removed.

At the time of my inspection, the aeration equipment in tank 4 appeared to have some units out of service. It will be necessary to pump down each aeration tank one at a time in order to remove any accumulated debris in the bottom of each basin. Accumulated debris that is removed from each basin must be disposed at a licensed landfill. In addition, the aeration equipment in each basin should be evaluated and repaired as necessary. Documentation of any repairs must be submitted to this office for review. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.

9. At the time of my inspection, clarifier 1 had a sludge blanket covering the surface of the tank. The surface skimmer was not operating. In addition, there was a substantial amount of sludge and solids floating on the surface of clarifier 2. Clarifier 3 had a moderate amount of sludge and floating debris on the surface of the tank. Clarifier 4 was gray in color, turbid and septic smelling. At the time of my inspection, I observed sludge sitting on the water surface in the weirs and in the bottom of the weirs. The scum troughs in clarifiers 1, 2, 3 and 4 were full and overflowing. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit. You must immediately begin to properly operate and maintain the surface skimmers, sludge returns, scum baffles and weir boxes.
10. It appears sludge is not being properly wasted from this plant as often as needed. A review of your monthly operating reports reveals 18,900 gallons and 13,440 gallons of sludge was removed from the plant in April and November 2006. Please provide a solids balance for the plant.
11. At the time of my inspection, the five up-flow clarifiers had a substantial amount of sludge covering each treatment unit. In addition, there was floating scum and algae observed. It will be necessary to pump down each of these treatment unit one at a time in order to remove the sludge that has been bypassed to them. In addition, the plates in several of these treatment units are in poor condition and need to be replaced. We expect these treatment units to be cleaned and repaired without delay.
12. At the time of my inspection, surface sand filters 1 and 4 were full of water. Surface sand filter 2 was approximately half full, however, water from unit 4 was seeping through the common wall between units 4 and 2. Surface sand filter 3 was in operation and was covered with a substantial amount of weeds. These weeds have been present for at least a year. A substantial amount of sludge was observed in all four filters. There was a substantial amount of water lying on the ground next to filters 2 and 4. It was evident these two units had overflowed at some point and time. In addition, sludge which has been removed from the surface sand filters in the past is being stockpiled adjacent to filters 2 and 4.

It will be necessary to remove the sludge from each of these sand filters, pull the weeds in sand filter 3, fix the cracks in the walls, replace the sand and repair the under drainage system as needed in each unit. In addition, it will be necessary to haul sludge on a regular basis to minimize carry-over of solids to downstream treatment units. Lastly, the stockpiled sludge must be disposed of in a licensed sanitary landfill.

Bypasses of the surface sand filters are unacceptable unless in accordance with Part III, Item 11 of your permit. In addition, bypasses of the surface sand filters must be reported in accordance with Part III, Item 12 of your permit. A review of your facility file indicates no bypass of the surface sand filters were reported in

accordance with your permit. As discussed in numerous telephone calls, bypasses must be reported. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit.

13. The effluent from the surface sand filters discharges to a tank that has a Sanuril chlorinator at the entrance of the tank and a Sanuril dechlorinator at the end of the tank. Ten States Standards (Section 102.44) requires a minimum contact period of 15 minutes at design peak hourly flow for chlorination systems. In addition, Ten States Standards (Section 103.43) requires a minimum contact period of 30 seconds for mixing and contact time shall be provided at the design peak hourly flow. Based on the size of the tank, location of chlorination/dechlorination equipment and volume of flow from this wastewater treatment plant it does not appear the chlorination/dechlorination facilities are adequate. Please provide calculations to verify that the systems are properly designed. Lastly, please remember that chlorination/dechlorination is required May 1 through October 31 of each calendar year.
14. At the time of my inspection, the effluent from the plant was visually clear. No samples were collected at the time of the inspection. However, inspection of the receiving stream revealed algae growth. The algae growth is a violation of Part III, Item 2 of your permit.
15. At the time of my inspection, the sludge tank near the back gate was within six inches from the top of the tank. As a result, the operator was not able to remove sludge from the system. With the high sludge blankets being maintained and the loss of the flow equalization tank, solids are being washed to the up-flow clarifiers and surface sand filters. These conditions are a direct result of your failure to properly operate and maintain the plant as required by Part III, Section 3 of the NPDES permit. We will expect the sludge in the holding tanks, clarifiers, up-flow clarifiers, and surface sand filters to be removed immediately and disposed of at a NPDES permitted facility. Once the mixed liquor has been lowered to acceptable levels, it will be necessary to remove sludge from the plant on a regular basis. Also, please inform me which activated sludge control method your operator is using to control the process.
16. The building which houses the blowers is in poor condition. The sides of the building are beginning to cave in. It will be necessary to replace or repair the building in order to protect the blowers.
17. Electrical wiring throughout the plant does not appear to meet any applicable standards. There are wires lying on the ground near the up-flow clarifiers and the blower building, near the flow splitter box, by the chlorination/dechlorination tanks and by the influent pump station. It will be necessary to have a licensed electrician evaluate the wiring in the plant, and make the necessary upgrades without delay.

18. Your NPDES permit which became effective on July 1, 2003, included a Schedule of Compliance for an Infiltration/Inflow Control Plan. The following milestones in the compliance scheduled have been missed:
- a. By January 1, 2004, Utility Operator Corporation was to develop and implement a plan to control infiltration and inflow (I/I) to the separate sewer system. The plan was to include:
 1. An ongoing program to identify and remove sources of infiltration and inflow. The program shall include the necessary funding level and the source(s) of funding.
 2. An inflow identification and control program that focuses on the disconnection and redirection of illegal sump pumps and roof down spouts. Priority should be given to removal of public and private inflow sources that are upstream from, and potentially contribute to, known areas of sewer system backups and/or overflows.
 3. Identification and prioritization of areas that will provide increased aquifer recharge as the result of reduction/elimination of infiltration and inflow to the system.
 4. An educational public outreach program for all aspects of I/I control, particularly private inflow.
 - b. By January 15, 2004 and each calendar year after, Utility Operator Corporation was to submit a summary report of all actions taken to minimize I/I during the previous calendar year. The report was to include:
 1. A map and description of inspection and maintenance activities conducted and corrective actions taken during the previous year.
 2. Expenditures for any infiltration/inflow related maintenance activities and corrective actions taken during the previous year.
 3. A map with areas identified for I/I-related investigation/action in the coming year.
 4. A calculation of the annual average I/I, the maximum month I/I for the reporting year.

To date, none of the compliance milestones have been met. Please be advised that Part III, Item 12 (D) states, "If the permittee is unable to meet any date for achieving an event, as specified in the schedule of compliance, the permittee shall submit a written report to the appropriate district office of the Ohio EPA within 14 days of becoming aware of such situation. The report shall include the following:

(1) The compliance event which has been or will be violated; (2) The cause of the violation; (3) The remedial action being taken; (4) The probable date by which compliance will occur; and (5) The probability of complying with subsequent and final events as scheduled." We will expect this written report without further delay.

Inflow/infiltration continue to impact the wastewater treatment plant performance. In a letter dated February 17, 2004, you estimate the cost to televise sewers, clean sewers/remove roots, seal joints, repair service connections, repair manholes, mob & DeMob, grading/seeding/mulching will cost \$377,650. This estimate does not include a percentage of the contingencies, engineering, administration, attorney fees, etc. also cited in this quote. However, in an estimate from Zemba Bros., Inc. dated December 15, 2004 to Water Quality Management it appears the estimate to rehabilitate thirty (33) manholes would cost approximately \$25,025. Lastly, in an estimate forwarded from the Village of Byesville (which was received from an independent firm) it appears the cost to clean and televise 9,000 feet of sanitary sewer will cost \$16,650. In addition, the cost to rehabilitate 29 manholes in the collection will be \$27,460. Please inform this office as to the reasons for these cost differences.

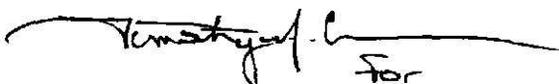
19. Part II, Item A of your permit states "The wastewater treatment works must be under the supervision of a Class III State certified operator as required by rule 3745-7-02 of the Ohio Administrative Code." Your current technical supervisor is a Class I operator. There has not been a certified Class III operator for approximately two (2) years. We will expect a licensed Class III operator be hired immediately.
20. Part II, Item L of your permit requires two (2) copies of an annual sludge report be submitted no later than January 31 of each calendar. We have not received annual sludge reports for calendar years 2000 and 2003. We will expect these reports to be submitted without further delay. Your 2006 annual sludge report was received on January 30, 2007.
21. Part III, Item 6 - Recording of Results of your permit states "For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information: (A) The exact place and date of sampling; (B) The person(s) who preformed the sampling or measurements; (C) The date the analyses were performed on those samples; (D) The person(s) who performed the analyses; (E) The analytical techniques or methods used; (F) The results of all analyses and measurements." There was a log book being kept in the influent storage building at one time. However, the book is no longer there. Please submit your log book for calendar years 2003 through 2006.
22. There have been numerous fecal coliform, chlorine residual, suspended solids, ammonia, CBOD₅ and dissolved solids violations of your NPDES permit. In addition, when samples are not collected in accordance with the permit the "AH" code is being utilized. Samples must be collected in accordance with your permit.

23. Public water is supplied to the Rolling Hills WWTP, however, there appears to be a lack of proper back-flow equipment to prevent cross connections. We will expect this to be investigated and addressed immediately.
24. The wastewater treatment plant is not adequately staffed. The operator who does the daily operation and maintenance activities lives in Delaware, Ohio. The operator therefore spends approximately 2-1/2 to 3 hours driving to and from this wastewater treatment plant. In addition, if time does not permit the operator does not travel to the Rolling Hills wastewater treatment plant. With the inflow/infiltration problems and the deteriorated equipment at the site, an operator needs to be at the site. The staffing of the plant must be addressed immediately.
25. The wastewater treatment plant property was mowed very little in 2006. There are numerous groundhog holes at the site and equipment lying on the ground around the treatment plant. We will expect the property both inside and outside of the plant to be mowed on a regular basis during 2007.

The wastewater treatment plant is in substantial non-compliance with the NPDES permit. The recent sewage bypass problems caused by your operation of the plant only serves to heighten and amplify the public health and environmental problems created by the Rolling Hills plant. Thus, your immediate action has become even more critical.

A copy of our completed inspection report is enclosed. Please submit a written response to the aforementioned comments, immediately addressing what course of action you intend to take to resolve these issues and when you will be in compliance. If you have any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte
Chemical Engineer - Environmental Specialist II
Division of Surface Water

JMW/dh

Enclosures

- c: Mark Mann, DSW, CO
- c: Larry Reader, DSW, CO
- c: Bill Fischbein, Legal, CO
- c: Gregg Bachmann, AGO (w/enclosures)
- c: Jim Wing, Inspector, PUCO
- c: Guernsey County Health Department

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature X <i>Edward Bischoff</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery 2/13/07</p>
<p>1. Article Addressed to:</p> <p>Edward Bischoff Utility Operator Corp. 9976 Brewster Lane Powell, OH 43065</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7006 0100 0003 5620 0033</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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<p>PS Form 3800, June 2002 See Reverse for Instructions</p>	

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