

MONROE
WOODSFIELD



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S.E.D.O. State of Ohio Environmental Protection Agency

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P.O. Box 1049
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March 31, 2009

Monroe County
0PB00051*GD

Mayor and Council
Village of Woodsfield
221 South Main Street
Woodsfield, OH 43793

Re: Nine Minimum Control Implementation/ Collection System Inspection

Dear Mayor and Council:

On March 10, 2009, Ohio EPA staff members Scott Foster and I met with Jeff Woodell (Village Administrator), Terrell Comstock (Water and Wastewater Superintendent), Mike Jones (Chief Operator), Paul Robison (Operator) and Larry Baker (Collections) to conduct an inspection of the Village of Woodsfield's wastewater collection system and the degree of implementation of the Nine Minimum Controls for reducing combined sewer overflow impacts. The Nine Minimum Controls are included in Part II, Item G of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 0PB00051*GD).

Discussion during the inspection and review of information that you have submitted to this office indicates that the Village is in compliance with permit requirements calling for implementation of the Nine Minimum Controls. Discussion regarding the Village's efforts for each of these controls and additional measures the Village should consider taking to improve upon current efforts is located below in Attachment A. Please note that continued implementation of the Nine Minimum Controls is critical to your achieving compliance with your NPDES permit.

The current status of the Village's Combined Sewer Overflow Long-Term Control Plan was also discussed during the inspection. The Village is currently on or ahead of schedule with these projects, which are expected to eliminate all combined sewer overflows.

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

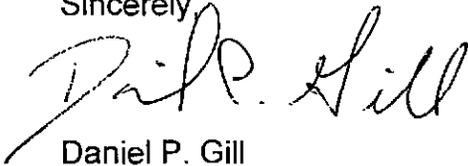
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If you have questions/concerns regarding this letter, I can be reached by telephone at (614) 644-2118 or email at dan.gill@epa.state.oh.us.

Sincerely



Daniel P. Gill
Environmental Specialist
Division of Surface Water, Ohio EPA, Central Office

Attachments

cc: Scott Foster, DSW/SEDO
DSW/CO - File

Woodsfield

Attachment A

Village of Woodsfield Combined Sewer Overflow (CSO) Compliance Inspection

Part II – Other Requirements Item G, in the permittee's NPDES permit (Ohio EPA No. 0PB00051), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls. Part II.B. of the National CSO Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

1. Proper operation & regular maintenance programs for the sewer system and CSOs.

Village of Woodsfield staff operates and maintains the wastewater treatment plant (WWTP) and collection system. Village staff inspects the four remaining CSOs (CSO 006 was closed during fall 2007) monthly regardless of precipitation and during rainfall events that are >0.5" (based on knowledge of the system's function). Summaries of CSO characteristics are reported to Ohio EPA monthly.

An operation and maintenance manual for the collection system was drafted in 1987. It was stated during the inspection that problem areas in the collection sewers have been identified and are cleaned monthly with the remainder of the collection system being cleaned on a reactive basis. Catch basins are cleaned monthly during summer and bimonthly during fall and winter. Collection line televising is performed on a reactive basis once problems or complaints have occurred – Village staff reported that the incidence of this is becoming less frequent as sewer separation projects are being implemented. A routine root control program is also implemented in identified problem areas. **Given the age of the O&M manual and the modifications to the structure, operation and maintenance of the collection system associated with the implementation of LTCP separation projects, the O&M manual should be reviewed by Village staff and updated accordingly. It is critical to periodically update this document to catalogue the knowledge of existing staff.**

Records of televising activities, inspections, collection system maintenance and repairs are maintained by Village staff in a log keeping note of date, time, items requiring attention, and corrective measures taken.

2. Maximum use of the collection system for storage.

Full treatment capabilities of the WWTP (1.2 MGD) are used during wet weather. CSOs are regulated by raised inverts of overflow pipes connected to the interceptors.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.

There are no significant industrial users of the Village's system. Food establishments have grease traps in place with records kept for the maintenance of these facilities.

4. Maximize flow at the WWTP for treatment.

The wastewater treatment plant is an oxidation ditch facility designed to treat an average daily flow of 0.53 MGD. The treatment facility is capable of handling sustained peak flows of 1.2 MGD. Village staff operates the facility at peak capacity during wet weather. Village staff reported that bottlenecks do exist in the collection system resulting in CSO activation prior to the WWTP reaching capacity; however, these are expected to be addressed during implementation of the Village's approved LTCP.

5. Prohibition of CSOs during dry weather.

The Village checks its CSOs monthly regardless of weather conditions. Village staff indicated that no dry weather overflows have been observed. Notably, the Village's local power provider had to shut down service to perform maintenance during the inspection outlined in this letter requiring the Village to use their own back-up energy generating capabilities. For reasons unknown at the time, the Village's back-up facilities went down resulting in the loss of power for a short period of time causing a dry weather discharge from at least one of the systems CSOs. While it appears that this situation was an anomaly, it (along with all other dry weather overflows) should be reported in accordance with the requirements in your NPDES permit – see Part II, Item G.5.

6. Control of Solid and Floatable Materials in CSOs.

The Village currently cleans the catch basins on a reactive basis. Street sweeping equipment is routinely operated throughout the Village. Village staff also implements a leaf-and-brush pick-up program.

7. Pollution prevention.

The Village has sewer use and anti-litter ordinances in place.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.

The Village has posted signs at each of the CSO outfalls.

It is recommended that the permittee periodically (e.g., during recreational season, when new projects are being implemented, etc.) distribute informational brochures or sewer bill inserts detailing CSO information (such as location, health concerns, and contact information to receive further details). Village staff indicated that a calling service had recently been initiated by the Village to notify citizens of various emergency-type situations. The Village should determine if it is appropriate to use this service to notify citizens of the occurrence of CSO activations, particularly for those CSOs discharging to sensitive areas.

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

The Village is continuing to monitor its CSOs according to requirements contained in the permittee's NPDES permit (Ohio EPA No. 0PB00051).