



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 25, 2007

Re: Ross County
Village of Frankfort WWTP
Compliance Evaluation Inspection
Correspondence (PWW)

Mayor and Council
Village of Frankfort
P.O. Box 351
Frankfort, Ohio 45628

Dear Mayor and Council:

On January 9, 2007, I conducted a compliance evaluation inspection (CEI) at the Frankfort Wastewater Treatment Plant (WWTP). The purpose of the inspection was to determine compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0PB00014*FD. At the time of my arrival, the plant was not staffed and Jay Minor later arrived around 1:30 p.m. to accompany me on my inspection.

Based on the findings of the inspection and the review of our records, Ohio EPA has the following comments:

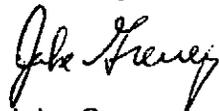
1. Inspection of the treatment plant showed that one clarifier is still out of service and according to a file review has been off-line for nearly two and a half years. Currently, the clarifier is drained and not being used. According to Mr. Minor, the village received bids to paint the tank although they were high and no contract was signed. The one clarifier in service does become overwhelmed with Inflow and Infiltration (I&I) flows that wash solids from the aeration basin into the clarifier which can lead to suspended solids violations. The failure to repair and operate the clarifier is a direct violation of Part III Item 3 of your NPDES permit which states all treatment systems shall be maintained in good working order and operated at all times. Please provide a repair schedule which will place the clarifier into service no later than May 31, 2007.
2. The weir in the clarifier was found to be full of scum and algae which could result in suspended solids violations. According to Jay Minor, the weir plates and trough are cleaned twice a week with water which was not very apparent as long stringy algae was present on the weir notch and in the trough. The weirs should be cleaned on a more frequent basis and documented in the daily log book.
3. To date, this office has yet to receive an update of I&I control measures that the village has enacted over the past two years and efforts taken to reduce flows. The lack of effort to reduce I&I flows and the failure to draft an I&I control plan will result in a compliance schedule in your new permit to conduct a Sanitary Sewer Evaluation Survey (SSES) and implement measures to reduce identified I&I flows.

4. Inspection of the clarifier in service still revealed multiple holes in the weir plates which allow wastewater to flow straight through the weir into the trough. These holes were observed during my last inspection and I instructed the village then that necessary repairs should be made to seal the holes. The continued failure by the village to make the necessary repairs to the treatment plant is a direct violation of Part III Item 3 of your permit and may result in future enforcement actions. Please provide documentation as to when the weir plates will be repaired.
5. Inspection of the head works showed the basket to be relatively clean in the primary dosing tank. The bar screen was observed with several rags and other debris which needed removed. The bar screen should be cleaned as needed to remove any accumulation of solids.
6. Review of the daily log book in the lab found the daily activities to be vaguely described. A detailed description of maintenance, process control, and other work conducted at the plant should be listed as well as the hours employees are at the plant. Multiple entries in the log book simply stated "Process Control Conducted."

Current staffing of the plant consists of Bryan Mowrey, Superintendent of the water and wastewater plant and the three village employees. According to Part II, Item A of your permit, the wastewater plant is to be under supervision of a Class II State Certified Operator. The supervision of the wastewater plant is currently provided by Wayne Grigsby, who is a Class IV operator providing technical supervision. As the technical supervisor of the plant, Mr. Grigsby has the legal responsibility to inform the village of necessary maintenance and process control measures required to insure compliance with the permit. Failure by the village to conduct the appropriate measures once instructed by Mr. Grigsby will be the responsibility of the village. At the time of my inspection the facility appeared to be in substantial compliance with their permit.

Please submit a written response within 21 days to the items listed above regarding operation and maintenance of the facility. A copy of my inspection report is enclosed for your review. 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: Wayne Grigsby, Technical Supervisor
- c: Sam Ackley, Village Administrator
- c: Bryan Mowrey, Plant Superintendent

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PB00014*FD	0H0021482	January 9, 2007	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Frankfort WWTP Frankfort, Ohio	1:20 p.m.	February 1, 2002
	Exit Time	Permit Expiration Date
	1:55 p.m.	January 31, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jay Minor, Village Employee	
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council Village of Frankfort P.O. Box 351 Frankfort, Ohio 45628	

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>--</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>--</u> Compliance Schedules
<u>M</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>M</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>---</u> Other
<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 letter.


Jake Gfeuey, Inspector, Ohio EPA, Southeast District Office

1/25/07
Date


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

1-25-07
Date