



State of Ohio Environmental Protection Agency

Southeast District Office

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

July 27, 2007

Re: Ross County
Ross Correctional Institution
Compliance Evaluation Inspection (CEI)
Ohio EPA Permit No. 0PP00050*CD
Correspondence (PWW)

Mr. Michael Sheets, Warden
Ross Correctional Institute
16149 State Route 104 North
Chillicothe, Ohio 45601

Dear Mr. Sheets:

On July 19, 2007, I met with Keith O'Dell and inspected the prison system's wastewater treatment plant. The purpose of the inspection was to determine your facility's compliance with the terms and conditions of their NPDES permit. This inspection was also conducted as a pre-permit inspection necessary prior to the issuance of your permit renewal. Based on the findings of the inspection and the review of our records, I have the following comments:

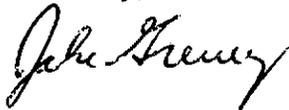
1. The large primary clarifier which was off line in November awaiting repairs of a VFD unit has been repaired and is available for use. Currently, the two smaller primary clarifiers are in use along with one final clarifier. The clarifiers are all rotated each fall early winter to allow the units in use to be drained and cleaned.
2. At the time of my inspection, only one aeration basin was in use as flows do not require the entire plant to be on line. The one aeration basin off line was in need of repairs to the one divider wall anchor system in the initial fine bubble diffuser basin. The necessary repairs to this anchor should be made in a timely manner to allow use of this basin if needed in the future. The basin in use was found to be well aerated with no foam or odor and adequate recirculation of the return activated sludge.
3. The two sludge digesters were in operation at the time of my inspection although the replacement of the PVC blower lines has not been completed. The old piping system should be replaced as soon as possible with more durable piping and adequate diffuser headers to prevent future blockage and frequent buckling of the piping. Please provide an updated status report within **30** days upon receipt of this letter regarding the replacement of the current PVC air lines and diffusers in the two sludge digester tanks.

4. Review of past MOR data has revealed ten effluent limit violations for pH since January 2007 at Outfall 002 (Former Coal Pile Storage Area). Several Notice of Violation (NOV) letters were sent requesting information as to why these violations have occurred and actions that will be taken to prevent future occurrences. As of this date not a single response has been received. In my last inspection letter in November 2006 I requested that a PTI be submitted to convey the flows contributing to the Outfall 002 discharge into an adjacent sanitary sewer for treatment at the wastewater plant. In order to prevent future permit violations which could lead to enforcement actions, a PTI shall be submitted by November 1, 2007. Please provide a schedule within **30** days upon receipt of this letter describing how the above deadline will be met.

5. My inspection letter dated May 22, 2006 stated that the current operation and maintenance manual for the facility requires a full time laboratory technician. A letter was received on August 23, 2006 stating that approval was granted to create and fill a full time laboratory position to meet the requirements of your O&M manual. As of this date a full time laboratory technician has not been hired. Please provide a schedule as to when a full time laboratory technician will be hired.

Inspection of the treatment plant showed all components to be in good operating condition and providing effective treatment. The effluent was observed clear and free of any suspended solids or objectionable odors. Attached for your review is a copy of my detailed inspection report. If you have any questions, please contact me at (740) 380-5416.

Sincerely,



Jake Greuey
District Site Representative
Division of Surface Water

JGG/dh

Enclosure

- c: Keith O'Dell, Treatment Plant Manager
- c: Ron Chaney, Ohio Department of Rehab & Corrections, Regional Project Manager

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPP00050*CD	OH0076490	July 19, 2007	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ross Correctional Institution WWTP 15802 State Route 104 Chillicothe, Ohio 45601	10:20 a.m.	December 1, 2002
	Exit Time	Permit Expiration Date
	11:35 a.m.	November 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Keith O'Dell, Plant Operator	(740) 773-1671
Name, Address and Title of Responsible Official	Phone Number
Mr. Michael Sheets, Warden Ross Correctional Institute 16149 State Route 104 North Chillicothe, Ohio 45601	

C. AREAS EVALUATED DURING INSPECTION

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

7/27/07

Date



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

7/27/07

Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection		X		
b. Permittee is taking actions to resolve violations			X	
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in <u>NPDES OPP00050*CD</u>	X			
e. Permittee is meeting compliance schedule	X			

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>1</u> Days/Week <u>7*</u>		X		
e. Operator holds unexpired license of class required by permit Class: <u>IV</u>	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: *Four operators and one part time lab technician. Facility needs a full time lab technician to conduct laboratory analysis and develop laboratory QA/QC program.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0</u> %		X		
b. Any collection system overflows since last inspection (CSO ___ SSO ___)		X		
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system			X	
g. Lift station alarm systems provided and maintained	X			
h. Are lift stations equipped with permanent standby power or equivalent	X			
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection		X		
j. Any complaints received since last inspection of basement flooding			X	
k. Are any portions of the sewer system at or near capacity		X		

Comments:

H. **SLUDGE MANAGEMENT**

a. Sludge Management Plan (SMP): April 1990 Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current				X
c. Sludge adequately disposed (Method: <u>Land application on own property</u>)	X			
d. If sludge is incinerated, where is ash disposed of?			X	
e. Is sludge disposal contracted (Name: _____)		X		
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP	X			
i. Records kept in accordance with state and federal law				X
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

