



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

April 1, 2009

**Re:** Ross County  
Ross Correctional Institution  
Reconnaissance Inspection  
Ohio EPA Permit No. 0PP00050\*DD  
Correspondence (PWW)

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

Dear Mr. Sheets:

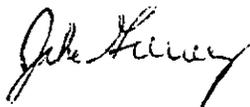
On March 16, 2009, I met with Keith O'Dell, outgoing operator and Mr. Charlie Burton, future interim operator and inspected the prison system's wastewater treatment plant. The purpose of the inspection was to determine your facility's compliance with the terms and conditions of its NPDES permit and discuss future operator staffing. Based on the findings of the inspection and the review of our records, I have the following comments:

1. At the time of my inspection, two primary and two secondary clarifiers were down for their annual cleaning and inspections. One primary clarifier was being used for sludge thickening and was near full waiting for the transfer of sludge to the digester when space becomes available. The one aeration basin was also off line as repairs were being made to reinforce the baffle walls and inspect the diffuser headers.
2. During my inspection, the UV disinfection system was being prepared to be placed back on line beginning May 1st for the disinfection season.
3. The two sludge digesters were in operation and full at the time of my inspection waiting for removal upon the hauling of sludge scheduled in the near future.

According to Part II, Item A of your NPDES permit the facility is currently a Class IV Wastewater Treatment Works which requires a Class IV operator to be listed as the Operator of Record per OAC 3745-7-04. Due to the retirement of Mr. O'Dell effective March 20, 2009 the facility is without a Class IV operator which is a violation of OAC 3745-7-02. Hiring a Class IV operator or re-classifying the plant to a Class III facility is necessary to be in compliance with OAC 3745-7-04.

Please provide a written response within **14 days** upon receipt of this letter as to how the facility will be properly staffed to be in compliance to Part II, Item A of your permit as well as OAC 3745-7-04. Failure to provide a properly certified Operator of Record within a timely manner could result in formal enforcement action. Attached for your review is a copy of the 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: Charlie Burton, Interim Plant Manager

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPP00050*DD	OH0076490	March 16, 2009	R	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	10:30 a.m.	August 1, 2008
	Exit Time	Permit Expiration Date
	11:30 a.m.	July 31, 2013

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	

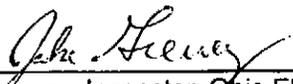
**C. AREAS EVALUATED DURING INSPECTION**

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

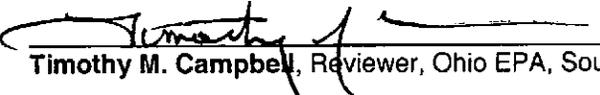
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached letter.

  
 \_\_\_\_\_  
 Jake Greuey, Inspector, Ohio EPA, Southeast District Office

4/1/09  
 \_\_\_\_\_  
 Date

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

4/1/09  
 \_\_\_\_\_  
 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 0PP00050*DD</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: <u>      </u>	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: No. of shifts: <u>1</u> Days/Week: <u>7*</u>		X		
e. Operator holds unexpired license of class required by permit Class: <u>III</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: <u>      </u> on MORS <u>      </u> 800 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: \*Two Class III operators and one part time lab technician. Facility has no Class IV operator to be listed as Operator of Record as required by NPDES permit.



Part 2 - Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used	X			
Conform with 40 CFR 136.3	X			
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3 - Laboratory, General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b. If alternate analytical procedures are used, proper approval has been obtained			X	
c. Analyses being performed more frequently than required by permit		X		
d. If (c) is yes, are results reported in permittee's self-monitoring report			X	
e. Commercial laboratory used:	X			
1. Parameters analyzed by commercial lab: <u>Metals, O&amp;G, Nutrients, Cyanide</u>				
2. Lab name: <u>Stantec Environmental Services</u>				

Comments:

Part 3 - Laboratory, Quality Control/Quality Assurance	Yes	No	N/A	N/E
f. Quality assurance manual provided and maintained				X
g. Satisfactory calibration and maintenance of instruments and equipment				X
h. Adequate records maintained				X
i. Results of latest U.S. EPA quality assurance performance sampling program: Date: _____ Satisfactory _____ Marginal _____ Unsatisfactory _____				

Comments:

## J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	Clear	None	None	Colorless	

Comments:

**K. MULTIMEDIA OBSERVATIONS**

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

**If any of the above are observed, ask the following questions:**

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

**Comments:**