

VILLAGE OF MALTA
MORGAN CO.



State of Ohio Environmental Protection Agency

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P.O. Box 1049
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August 17, 2009

Morgan County
OPA00095*DD

Mayor and Council
Village of Malta
P.O. Box 307
Malta, OH 43758

Re: Nine Minimum Control Implementation/ Collection System Inspection

Dear Mayor and Council:

On July 20, 2009, Ohio EPA staff members Scott Foster, Jake Greuey and I met with Mayor Paul Barkhurst and Village Administrator Darrin Carpenter to conduct an inspection of the Village of Malta's wastewater collection system. Specifically, the degree of implementation of the Nine Minimum Controls (NMC) for reducing combined sewer overflow (CSO) impacts was discussed. The Nine Minimum Controls are included in Part II, Item E of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. OPA00095*DD).

Discussion during the inspection, review of records, and review of information submitted to this office indicates that the Village is in compliance with permit requirements calling for implementation of the Nine Minimum Controls. Details regarding the Village's efforts and additional measures the Village should implement are contained in Attachment A below.

Additionally, Malta's progress toward implementing its approved Long-Term Control Plan for controlling CSOs was discussed during the inspection. It is understood that the Village is currently finishing design of the first phase of its approved LTCP (consisting of a total of three phases). Phase 1 of the sewer separation work is expected to go out to bid during September 2009. This phase is to address the five largest CSOs by installing all new sanitary sewers (the existing combined system will be used as storm sewers).

Finally, during our inspection we observed an outfall pipe located next to the overflow pipe associated with CSO 005 nearest the bridge in "Lower" Malta. Village staff present during the inspection did not know the function of this pipe though it appeared that wastewater connections may exist. The Village should investigate this pipe and characterize its function and connections immediately. Should wastewater connections

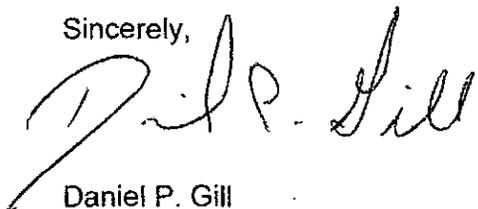
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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exist, additional corrective measures may be needed for the Village to satisfy the stated goal of the approved Long-Term Control Plan of complete overflow elimination. Please provide a written response to this letter within thirty (30) days of its date detailing the nature of this pipe and any corrective actions the Village will take to address it should they prove necessary.

If you have questions/concerns regarding this report, 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

Attachment A
Village of Malta Combined Sewer Overflow Inspection

Part II, Other Requirements, Item E., in the permittee's NPDES permit (Ohio EPA No. OPA00095), indicates that the entire wastewater collection 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 and regular maintenance programs for the sewer system and CSOs.

Village of Malta staff operates and maintains the wastewater collection system. Maps of the sewer system are being updated as separation work moves forward.

The Village checks the sewer system outfalls every other day regardless of rainfall and during wet weather events. **The Village should continue this practice as it will help to assess the degree of success of separation work, as well as, help identify illegal connections to the storm system that may remain.**

The Village cleans the portion of the sewer system located nearest the Muskingum River (known for experiencing the greatest degree of sedimentation) following rain events with the remainder of the collection lines being cleaned on an as-needed basis. Cleaning of catch basins is an ongoing effort which Village staff performs by hand. The Village does not have an Operation & Maintenance manual in place. **Given the forthcoming modifications to the structure, operation and maintenance of the collection system associated with the implementation of LTCP separation projects, an operational plan should be developed by Village staff and updated accordingly. It is critical to periodically update this document to catalogue the knowledge of existing staff as it pertains to effective operation & maintenance and system layout.**

No formal records of inspection or maintenance activities are maintained. **Records of CSO inspections, as well as, maintenance and repair activities for the collection system should be kept in a centralized log. Maintaining such a document can provide valuable insight when working to identify problem areas and reviewing O&M procedures, as well as, establish an ongoing written record of the system for future staff.**

2. Maximum use of the collection system for storage.

The Village has installed duckbill devices on all CSOs to prevent receiving waters from backflowing into the collection system.

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

The permittee reported that industrial discharges to the wastewater collection system

consist primarily of sanitary sewage.

4. Maximize flow at the WWTP for treatment.

The Village of McConnelsville is responsible for the treatment of Malta's wastewater.

5. Prohibition of CSOs during dry weather.

Village staff indicated that collection system outfalls are checked every other day, regardless of the occurrence of precipitation. **As noted above, the Village should continue this effort to help evaluate the performance of its system and control projects.**

6. Control of Solid and Floatable Materials in CSOs.

The collection lines near the Muskingum River are cleaned following rainfall by flushing the system with a fire hose. The remainder of the system is cleaning on an as needed basis. Catch basins are checked after rainfall and cleaned accordingly (shoveled manually).

7. Pollution prevention.

Village staff reported that street and curb cleaning is an ongoing effort that is performed by hand. Also, the Village implements a leaf pick-up program in the fall.

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

Signs are installed at each of the CSO outfalls. **Please note that these signs should be visible from all directions of approach (i.e., from land and from the receiving water – double-sided signs may be needed).** These signs should identify the outfall as a CSO, note its potential to discharge untreated sewage, and provide a Village contact phone number where additional information can be obtained. During the inspection, the lettering on several signs was observed to be peeling. It is critical that these signs be maintained such that they are easily read by the public.

Additionally, it is recommended that the permittee periodically (e.g., during the recreational season, in association with construction projects, etc.) distribute informational brochures or sewer bill inserts detailing CSO information (health concerns, locations, and contact information to receive additional information).

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

The permittee is continuing to monitor each of its CSO outfalls. **It should be noted that use of the "AF" code (referring to high water) should be discontinued.** If the elevation of the receiving water prevents monitoring at the outfall itself, the permittee should check the manhole containing the CSO regulator to determine CSO characteristics. Additionally, CSO regulators should be checked during all CSO inspections to check for and remove obstructions.