



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korteski, Director



1PB0003120080505

DARKE

UNION CITY STP

MILLER, JOSEPH

2008/05/05



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

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

May 5, 2008

Mayor and Council
The Village of Union City
401 East Elm Street
Union City, IN 45390

**RE: NOTICE OF VIOLATION – Village of Union City WWTP
Compliance Evaluation Investigation, Union City, Darke County**

Mayor and Council:

On April 9, 2008, I conducted an inspection at the Union City WWTP wastewater treatment works. This inspection was conducted to determine compliance with the NPDES permit.

Numerous sanitary sewer overflows (SSOs) have been reported for this facility. A sanitary sewer overflow is an overflow, spill, release, or diversion of wastewater from a sanitary sewer system. Sanitary sewer overflows that reach waters of the state are point source discharges that are prohibited unless authorized by an NPDES permit. They constitute noncompliance. A focused effort to reduce infiltration and inflow and thereby sewer overflows is needed.

A response to this inspection is requested. Your response should include the following items:

1. Provide a list of high priority areas for I/I removal as identified by the 2002 report authored by Key Engineering, entitled "Sanitary Sewer Evaluation Survey for Union City, Ohio". Include those areas designated as either "failure" or "high volume" with regards to I/I.
2. Provide a proposed schedule for addressing the excessive I/I in those areas identified by the Key Engineering. Provide a description of proposed projects, both system-wide and high-priority areas. Include proposed budgeting to support this I/I program.

Provide a response to this inspection report by **June 6, 2008**. If you have any questions, I can be reached at (937) 285-6109.

Sincerely,

Joe Miller

Division of Surface Water

CC: Darke County Health Department
Mike Grimes, Utilities Superintendent



Permit # : 1PB00031*DD
 NPDES # : OH0022454



State of Ohio Environmental Protection Agency
 Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00031*DD	OH0022454	4/9/08	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Union City WWTP Beamsville-Union City Road Union City, OH 45390	10:00 AM	3/1/2005
	Exit Time	Permit Expiration Date
	12:30 PM	2/28/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mike Grimes, Superintendent	937-968-4305	
Name, Address and Title of Responsible Official	Phone Number	
Mayor James T. Nelson Village of Union City 419 East Elm Street Union City, OH 45390	937-968-6664	

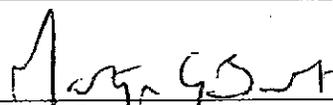
Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	N	Compliance Schedule
M	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
N	Facility Site Review	S	Sludge Storage/Disposal	N	Other
M	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

Collection system was rated as marginal due to the volume of infiltration and inflow exceeding the WWTP capacity during wet weather.

Operator log book needs to be initiated as per OAC 3745-7.

Facility will be designated as a Class II facility as per OAC 3745-7-04 in the next permit.

Inspector	Reviewer
 Date: 5/5/08	 Date: 5/5/08
Joseph Miller Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit # : 1PB00031*DD
NPDES #: OH0022454

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... N/A
- (d) Flows and loadings conform with NPDES permit..... N
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Flows exceed WWTP design flow capacity during wet weather.
All sanitary sewer overflows are prohibited except under emergency conditions where the overflow occurs in full compliance with all of the provisions of 40 CFR 122.41(m) and Part III Item 11 of the NPDES permit.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations.....
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... Y

Comments/Status:

Compliance schedule for delineation of land irrigation area with appropriate setbacks.
Frequent sanitary sewer overflows noted. Sanitary sewer overflows that reach waters of the state are point source discharges that are prohibited unless authorized by an NPDES permit. They constitute noncompliance.
In order to affect excessive sanitary overflows, an aggressive infiltration and inflow removal program is necessary.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator X or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: II
- (f) Copy of certificate of Operator of Record displayed on-site..... NE
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... Y
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

Record Keeping:

- (a) Log book provided..... NE
- (b) Format of log book (i.e. computer log, hard bound book)

Need to establish log book record keeping program. Program specifics forwarded separately.
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- (c) Log book(s) kept onsite (in an area protected from weather)..... NE
- (d) Log book contains the following:
 - I. Identification of treatment works..... NE
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... NE
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... NE
 - IV. Laboratory results (unless documented on bench sheets)... N/E
 - V. Identification of person making log entries..... NE
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO X)
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power
or equivalent..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... Y

Comments/Status:

Infiltration and inflow cause flows to exceed plant design capacity. Some smoke testing and camera-work has been done on sewers. A concentrated program to identify and eliminate I/I should be implemented to address these issues.

A infiltration and inflow report was completed in 2002 by Key Engineering. The report indicates many areas that requiring I/I reduction work. Current expenditure on I/I removal is approximately \$35,000 to \$50,000 a year.

Bon Bon and South Division Street area at capacity and frequently overflows during rain events.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N
(c) Sludge adequately disposed..... N/A
(Method: never removed)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... N
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... NA
(g) Adequate sludge storage provided at plant..... NA
(h) Land application sites monitored and inspected per SMP..... NA
(i) Records kept in accordance with State and Federal law..... NA
(j) Any complaints received in last year regarding sludge..... NA
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

Comments/Status:

Sludge has never been removed from lagoons. Check the depth of sludge in the lagoons to determine need for removal.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
(Date of last calibration: 1/year)
- (c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Ultrasonic flow meter on influent, orifice flow meter on discharge to land application. Ensure flow meter is calibrated annually.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: O&G, NH3, CBOD5, TSS, metals

Lab name: MASl Laboratories

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... N/E
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

Comments/Status:

Update Quality assurance manual and laboratory S.O.P.s .