



State of Ohio Environmental Protection Agency

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1PD0002220090112

HIGHLAND GREENFIELD WWTP

JACKSON, JOSHUA | 2009/01/12

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

City of Greenfield
Correspond.



State of Ohio Environmental Protection Agency

Southwest District Office

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

January 12, 2009

Mayor & Council
City of Greenfield
P.O. Box 300
Greenfield, OH 45123

**RE: City of Greenfield WWTW/Compliance Evaluation Inspection Report
NPDES Permit No. OH0021083/OEPA PERMIT NO. 1PD00022*FD**

Ladies & Gentlemen:

On December 31, 2008, Joshua Jackson of this office conducted an NPDES compliance evaluation inspection at the City of Greenfield wastewater treatment works (WWTW). Jim McCoy, representing the facility, was present during the inspection. The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES Permit.

A copy of Mr. Jackson's report on the inspection is enclosed. As noted within the inspection report, three evaluated areas received below "Satisfactory" ratings. **Please pay special attention to the compliance dates (items requiring correction) located within the report.**

Thank you and your staff for the time extended during the inspection process. If you have any questions, please feel free to contact Mr. Jackson by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Martyn Burt
Compliance & Enforcement Supervisor
Division of Surface Water

cc: Charles Bowman, City of Greenfield (w/report and attachments)
Jim McCoy, City of Greenfield (w/report and attachments)
Steve Morrison, Woolpert (w/report and attachments)

Enclosures





State of Ohio Environmental Protection Agency
Southwest District Office

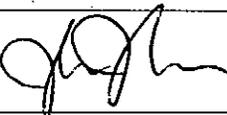
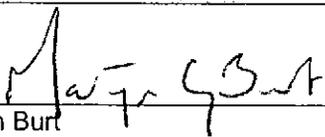
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PD00022*FD	OH0021083	12/31/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Greenfield WWTW 187 Lost Bridge Road Buckskin Township, Highland County	9:00 a.m.	7/1/2005
	Exit Time	Permit Expiration Date
	11:00 a.m.	7/31/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jim McCoy, Operator of Record Brian Smith, Water & Sewer Services Director	937-981-3413 937-981-2435	
Name, Address and Title of Responsible Official	Phone Number	
City of Greenfield Council Attn: Charles Bowman P.O. Box 300 Greenfield, OH 45123	937-981-3500	

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	U	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
U	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	

Inspector	Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
1-9-09 Date	1/9/09 Date



Inspection Findings

Wet Weather Issues

The City of Greenfield is currently under Director's Final Findings & Orders (DFFOs) for the elimination of illegal sanitary sewer overflows within the sewage collection system. Currently, the wastewater treatment works (WWTW) is under construction and is scheduled to be substantially completed by May 1, 2008. The DFFOs required completion of the WWTW upgrade by July 31, 2008. Because this work has not yet been completed, a rating of "Unsatisfactory" was given for the "Compliance Schedule" section of this report.

Despite work that has already been accomplished to eliminate the SSOs (Railroad Interceptor Project, West Jefferson Street Pump Station upgrade), several have occurred over the last few months during intense rain events. There have also been several events that caused the current head works of the WWTW to overflow the primary clarifier walls; as was documented in the compliance inspection report sent to the City earlier this year. Below is a summary of the collection system and WWTW overflow events reported by the City in 2008:

Greenfield WWTW	Washington/Oak Sts. SSO	Greenhills Drive PS
6/4/2008	6/4/2008	
5/16/2008		
4/4/2008	4/4/2008	
3/18/2008	3/18/2008	3/18/2008
3/4/2008	3/4/2008	

The City contracted with their design engineers (Woolpert) to conduct collection system flow monitoring in 2008 and compile a sanitary sewer assessment report (SSAR) with recommendations to reduce the amount of rain derived infiltration and inflow within the collection system. This report was submitted to Ohio EPA September 2, 2008.

The City also contracted with Municipal & Contractor Sealing Products, Inc. to install 63 manhole chimney seals and 85 manhole inserts (as identified in the 2005 sanitary sewer evaluation study). This work was completed September 15, 2008.

The City has committed to identify and evaluate storm water cross-connections within the sewage collection system in 2009. The 2001 and 2005 SSES reports will be the basis for this investigation. **By no later than May 15, 2009, the City shall provide Ohio EPA a list of storm water cross-connections identified during this investigation and a schedule for elimination. The DFFOs will not be closed out until all illegal SSOs are eliminated.**

Effluent Limit Violations

(Period of Review: February 2008 – November 2008)

7D = Weekly 30D = Monthly 1D = Daily
Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
February 2008	Phosphorus, Total (P)	7D Qty	9.3	11.1646
February 2008	Dissolved Oxygen	1D Conc	6.0	3.6
February 2008	Dissolved Oxygen	1D Conc	6.0	5.7
March 2008	Total Suspended Solids	30D Qty	187	393.924
March 2008	Phosphorus, Total (P)	7D Qty	9.3	12.8793
March 2008	Total Suspended Solids	7D Qty	260	1099.60
March 2008	Dissolved Oxygen	1D Conc	6.0	4.6
March 2008	Dissolved Oxygen	1D Conc	6.0	4.2
May 2008	Dissolved Oxygen	1D Conc	6.0	5.8
June 2008	Dissolved Oxygen	1D Conc	6.0	5.
July 2008	Dissolved Oxygen	1D Conc	6.0	5.9
August 2008	Phosphorus, Total (P)	30D Conc	1.0	1.18875
August 2008	Chlorine, Total Residu	1D Conc	0.038	.23
September 2008	Phosphorus, Total (P)	7D Conc	1.5	1.53

*Due to the number of reported numeric violations, a rating of "Marginal" was given in the "Effluent/Receiving Waters" section of this report.

Items Noted During the Inspection

1. The City is in the process of switching to alum as a coagulant to bind phosphorus and settle it out in the clarifiers.
2. Currently the City is using one of the aeration basins as an equalization basin while the Jet Aeration equipment is installed. Once this basin is completed, operations staff will utilize the other basin as EQ while it is converted as well.
3. The effluent out of the clarifiers and at the outfall was free from observable solids. The receiving stream contained some algae around the outfall structure. The receiving stream substrate was not visible due to high flows in the stream.
4. After the inspection, I forwarded the wastewater operation record keeping requirements shown in Ohio Administrative Code 3745-7-09 to Mr. McCoy. He modify the current operator log accordingly.

