



**Environmental  
Protection Agency**

**Ted Strickland.** Governor  
**Lee Fisher.** Lt. Governor  
**Chris Korleski.** Director



\*1PK0000920080424\*

CLERMONT LOWER EAST FORK REGIONAL WWTP

WARE, RONALD

2008/04/24



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

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

April 24, 2008

Tom Yeager, Director of Utilities  
Clermont County Water & Sewer District  
2379 Clermont Center Drive  
Batavia, Ohio 45103

**Re: Lower East Fork Reg. WWTP, NPDES Permit No. 1PK00009\*KD / OH0049379  
Compliance Evaluation Inspection**

Dear Mr. Yeager:

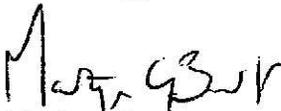
On Thursday, March 20, 2008, Mr. Ron Ware of this office conducted a Compliance Evaluation Inspection at the above referenced facility. Bill Beyer (WSD Supervisor), Greg Costello and Tony Meek represented Clermont County during the inspection. The purpose of the inspection was to evaluate several aspects of plant operation and performance. A copy of the inspection report is enclosed.

As indicated in the attached report, there was one area evaluated during the inspection that was rated as "unsatisfactory." The area designated as "Effluent/Receiving Waters" received an "unsatisfactory" rating due to the numerous overflow events that have occurred at the plant's flow equalization basins since the last compliance inspection in October of 2006.

Please provide this office with a written description of any actions, either taken or proposed, to address this situation. This written description should include the dates, either actual or proposed, for completion of these actions. Please provide this office with this written response within thirty days of receipt of this letter.

If you have any questions regarding this report, please contact Mr. Ware at (937) 285 - 6098.

Sincerely,



Martyn Burt

Compliance and Enforcement Supervisor

C: Steve Knipp, Clermont County Sewer District  
Bill Beyer, Clermont County Sewer District  
MB/mab



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
1PK00009*KD	OH0049379	3/20/08	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Clermont County - Lower East Fork Regional WWTP 1050 U. S. Route 50 Milford, Ohio 45150	10:05 A.M.	August 1, 2005
	Exit Time	Permit Expiration Date
	11:25 A.M.	January 31, 2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bill Beyer, WSD Supervisor Greg Costello, Operations Supervisor Tony Meek, Operator	(513) 732 - 7040 (513) 831 - 8124	
Name, Address and Title of Responsible Official	Phone Number	
Tom Yeager, Director of Utilities Clermont County Water & Sewer District 2379 Clermont Center Drive Batavia, Ohio 45103	(513) 732 - 7930	

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

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

Please see attached report and cover letter.

Inspector	Reviewer
Ron Ware Date 4/24/08	Martyh Burt Date 4/24/08
Ron Ware Division of Surface Water Southwest District Office	Martyh Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit # : 1PK00009\*KD

NPDES # : OH0049379

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..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... Y
- (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:

**Section F: Compliance Schedules/Violations**

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

Comments/Status:

See attached effluent limitation violation summary.

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  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) Operator holds unexpired license of class required by permit..... Y  
Class: IV
- (f) Routine and preventative maintenance schedule/performed on time..... Y
- (g) Any major equipment breakdown since last inspection..... N
- (h) Operation and maintenance manual provided and maintained..... Y
- (i) Any plant bypasses since last inspection..... Y
- (j) Regulatory agency notified of bypasses..... Y  
By SSO report  and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... Y

**Collection System:**

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... Y  
(CSO  and/or SSO )
- (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..... Y
- (g) Lift station alarms provided and maintained..... Y
- (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 Y
- (k) Are any portions of the sewer system at or near capacity..... Y

**Comments/Status:**

Treatment works: Telemetry calls go out to Operations staff (as well as Water Works staff) for the following events: High influent flow, High water level in backwash pit, power outage, blower outage, digester blower outage.

Collection System: The collection system was not specifically evaluated. Influent flows to the plant indicate significant I/I in the system.

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**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date: 6/3/2004 Approval #: 05-438-PW Not submitted  N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y  
(Method: land application at agronomic rates)
- (d) If sludge is incinerated, where is ash disposed of N/A
- (e) Is sludge disposal contracted..... Y  
(Name: **Utter Construction > Rumpke**)
- (f) Has amount of sludge generated changed significantly since last inspection..... Y
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... N/E
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

**Comments/Status:**

**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: See comment section)
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration: Nov. 2, 2007)
- (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..... N
- (f) Flow measuring equipment inspection frequency  
 Daily  Weekly  monthly  other

**Comments/Status:**

During the winter months, effluent flow metering consists of totalized magmeters in north effluent filters plus filter bypass (weir with an ultrasonic level sensor) plus ultrasonic meters on the south effluent filters. During the summer months, effluent flow metering consists of ultrasonic level sensors after the UV channels.

Other flow meters: A weir with an ultrasonic level sensor at the EQ basin bypass, and magmeters at the plant headworks.

**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).. N/E
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/E
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: Mercury, sludge metals

Lab name: Belmonte Labs

*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..... Y
- (i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory

Date:

**Comments/Status:**

Permit # : 1PK00009\*KD  
NPDES #: OH0049379

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	None	None	None	

**Comments/Status:**

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

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

- (1) What is the cause of the condition?
- (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/Status:**

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
1PK00009*KD	February 2007	001	00530	Total Suspended Solids	7D Conc	18	31.6666	2/15/2007
1PK00009*KD	February 2007	001	00530	Total Suspended Solids	7D Qty	613	857.327	2/15/2007
1PK00009*KD	January 2008	001	01119	Copper, Total Recovera	1D Conc	43	89.4	1/10/2008
1PK00009*KD	January 2008	001	01119	Copper, Total Recovera	1D Qty	1.5	3.08263	1/10/2008

#### SECTION D: SUMMARY OF FINDINGS/COMMENTS

The Clermont County - Lower East Fork Regional WWTP has a design average daily flow of 9.0 MGD and a peak flow rating of 15.0 MGD. Major components of the wet-stream treatment system include: influent pumping, coarse bar screens, grit removal tank, two flow equalization basins, two 3.1 million gallon oxidation ditches, three secondary clarifiers, seven effluent filter units, effluent pumping, UV disinfection, and post aeration. Sludge handling facilities include two first stage aerobic digesters and one second stage aerobic digester, and a sludge filter press building.

#### **Areas that were rated as "Unsatisfactory" and the reasoning behind the ratings:**

##### Effluent/Receiving Waters:

Since the last compliance inspection of this facility (on October 31, 2006), there have been 56 days during which the facility had to bypass partially treated wastewater from the flow equalization basins (see attached table below for dates and flow volumes). Until late March 2007, the main reason for these bypass events was the fact that influent flows from the plant head works had to be directed to oxidation ditch # 1 through an existing thirty-six inch diameter sewer that normally directs flow to the two existing flow equalization basins during high flow events. The size of this sewer limited the hydraulic capacity through the plant.

A new forty two inch sewer from the plant head works to the flow splitter tank for the oxidation ditches was put into service on March 27, 2008. The reason given for the bypass events since March 2007 was the inability of the plant to keep up with high sustained flow events while also attempting to keep treatment solids in the oxidation ditches from washing out.

Date	Outfall 001 (MGD)	Outfall 002 (MGD)	Bypass duration (hrs)
11/16/2006	8.64	2.16	12.5
11/17/2006	9.6	2.29	17.5
12/25/2006	7.9	7.29	53.5
1/1/2007	6.89	1.77	8.5
1/2/2007	8.91	1.04	6
1/5/2007	9.05	0.449	3.23
1/6/2007	9.01	1.535	24
1/7/2007	9.1	2.49	24
1/8/2007	9.48	2.2	24
1/13/2007	10.25	2.32	8
1/14/2007	9.75	6.16	24
1/15/2007	9.7	11.44	24
1/16/2007	9.4	3.33	24
1/17/2007	8	1.21	18
2/21/2007	8.56	7.4	22.5
2/22/2007	8.1	4.58	24
2/23/2007	7.77	1.65	24
2/24/2007	8.86	1.94	24
2/25/2007	8.11	8.4	24
2/26/2007	8.08	1.82	23.5
3/1/2007	7.97	0.11	1
3/2/2007	8.12	2.6	24
3/3/2007	8.41	0.04	6.5
10/23/2007	10.48	0.32	14.5
10/24/2007	10.3	1.33	22
12/15/2007	12.8	0.64	2
12/16/2007	11.76	2.42	22
2/5/2008	8.29	5.76	12.53
2/6/2008	7.18	9.66	24
2/7/2008	7.5	3.89	24
2/8/2008	7.1	3.63	24
2/9/2008	6.7	2.51	24
2/10/2008	7.68	0.065	24
2/12/2008	8.34	3.6	13
2/13/2008	7.74	2.96	24
2/14/2008	7.71	0.87	24
2/15/2008	7.93	0.69	24
2/16/2008	7.79	0.96	24
2/17/2008	8.99	1.76	21
2/18/2008	10	0.62	22
3/4/2008	11.3	9.8	23.75
3/5/2008	12.22	2.03	22
3/6/2008	11.24	0.19	8.5
3/7/2008	10.68	1.45	17.6
3/10/2008	11.4	1.93	11
3/11/2008	12.31	1.65	24
3/12/2008	11.57	0.18	21
3/14/2008	13.29	1.64	11.5
3/15/2008	13.18	1.1	22
3/18/2008	13.43	5.84	8

Date	Outfall 001 (MGD)	Outfall 002 (MGD)	Bypass duration (hrs)
3/19/2008	13.01	12	24
3/20/2008	12.52	1.66	18
3/28/2008	9.88	0.056	9.5
3/29/2008	9.52	0.503	18.5
3/30/2008	11.07	3.52	24
3/31/2008	11.22	3.01	24