



**Environmental  
Protection Agency**

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



\*1PB0002220080828\*

CLERMONT NEW RICHMOND STP

JACKSON, JOSHUA 2008/08/28

Village of New Richmond  
Correct?



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

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

August 26, 2008

Mayor & Council  
Village of New Richmond  
102 Willow Street  
New Richmond, OH 45157

**NOTICE OF VIOLATION**

**RE: Village of New Richmond WWTP/Compliance Evaluation Inspection Report  
NPDES Permit No. OH0021156/OEPA PERMIT NO. 1PB00022\*FD**

Ladies & Gentlemen:

On August 19, 2008, I conducted an NPDES Compliance Evaluation Inspection at the Village of New Richmond wastewater treatment works (WWTW). Ken Shearwood and Jeff Knoechel were present during the inspection. The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES Permit.

As indicated in the enclosed NPDES Compliance Inspection Report, two areas evaluated received below "Satisfactory" ratings. The justification for these ratings is included in the report. **Please pay special attention to the compliance dates (items requiring correction) located throughout the report.**

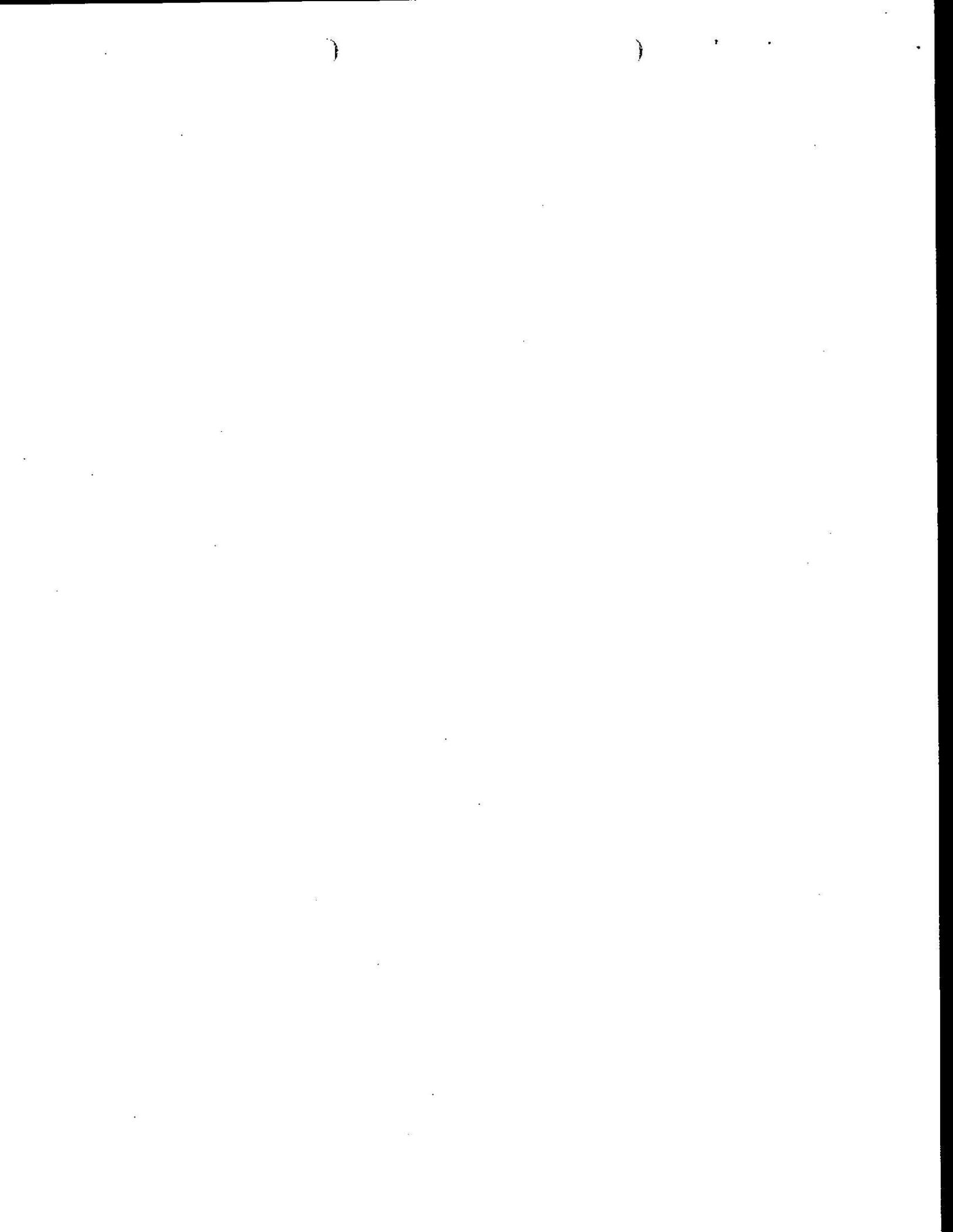
Thank you and your staff for the time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at [joshua.jackson@epa.state.oh.us](mailto:joshua.jackson@epa.state.oh.us).

Respectfully,

Joshua Jackson  
Environmental Specialist 2  
Division of Surface Water

cc: Dave Kennedy, Village of New Richmond (w/report and attachments)  
Ken Shearwood, Village of New Richmond (w/report and attachments)







State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

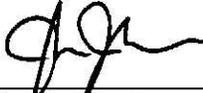
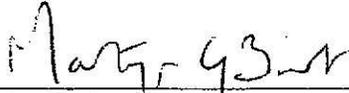
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00022*FD	OH0021156	8/19/2008	C	S	

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of New Richmond WWTW 1032 Front Street New Richmond, Clermont County	9:30 a.m.	4/1/2006
	Exit Time	Permit Expiration Date
	12:30 p.m.	3/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ken Shearwood, Operator of Record Jeff Knoechel, Operator	513-553-4160	
Name, Address and Title of Responsible Official	Phone Number	
David Kennedy, Village Administrator Village of New Richmond 102 Willow Street New Richmond, OH 45157	513-553-4146	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment			
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Compliance Schedule			
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program			
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input checked="" type="checkbox"/> Other			
<input checked="" type="checkbox"/> 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
8-26-08 Date	8/27/08 Date

Permit # : 1PB00022\*FD  
NPDES #: OH0021156

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)..... Y
- (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..... 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:

**Section E: Permit Verification**

- (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..... N

Comments/Status:

**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) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (e) Operator of Record holds unexpired license of class required by permit..... Y  
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site..... N
- (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..... Y
- (j) Operation and maintenance manual provided and maintained.... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A  
 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..... Y
- (b) Format of log book (i.e. computer log, hard bound book)  

Hard bound book.
------------------
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
  - I. Identification of treatment works..... Y
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
  - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... N
  - IV. Laboratory results (unless documented on bench sheets)... Y
  - V. Identification of person making log entries..... Y
- (e) 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 (cont.)**

**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..... N
- (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..... N

**Comments/Status:**

The Village is able to obtain a rental portable generator and pump through a company in Cincinnati.

The Village received one basement flooding complaint and it was due to a collapsed main sewer line within the Village. The sewer was repaired at the time that the collapse was discovered.

Operations staff will establish a more detailed protocol for logging O&M work. This will mirror the guidance provided in the Op Cert Rules.

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date: \_\_\_\_\_ Approval #: \_\_\_\_\_ Not submitted  N/A
- (b) Sludge management plan current..... N/A
- (c) Sludge adequately disposed..... Y  
(Method:Hauling to a solid waste landfill)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y  
(Name:Rumpke)
- (f) Has amount of sludge generated changed significantly since  
last inspection..... N
- (g) Adequate sludge storage provided at plant.....Y
- (h) Land application sites monitored and inspected per SMP..... N/A
- (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)..... N/A

**Comments/Status:**

The Village utilizes a belt filter press to dewater the sludge; which is then place in a Rumpke roll-off box for disposal at a solid waste landfill.

**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:Magmeter)
- (b) Calibration frequency adequate ..... N  
(Date of last calibration: ?)
- (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:**

**Section I: Self-Monitoring Program (cont)**

**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..... Y
  - (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: Everything except DO, pH and Temperature.

Lab name: Clermont County Sewer District

*Quality Control/Quality Assurance*

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

Date:

**Comments/Status:**

The Village obtained permission to utilize a luminescence dissolved oxygen meter. The Village was not calibrating the meter. Operations staff will now begin to calibrate the DO meter.

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

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	none	none	mild	mild	mild	clear	

**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:**

### Inspection Findings

The Village of New Richmond wastewater treatment works (WWTW) is permitted to treat and discharge an average daily flow of 0.55 million gallons/day (MGD). A review of the discharge monitoring reports (DMRs) from January 2007 through June 2008, show an average daily flow of 0.35 MGD (with a median of 0.24 MGD).

A review of the discharge monitoring report (DMR) data submitted by the Village in 2007 and 2008 shows the following effluent violations:

#### EFFLUENT LIMIT VIOLATIONS (Period of Review: January 2007 – June 2008)

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

Reporting Period	Parameter	Limit Type	Limit	Reported Value
February 2007	Fecal Coliform	7D Conc	2000	3872.98
March 2007	Total Suspended Solids	7D Qty	54.1	68.3381
July 2007	Fecal Coliform	7D Conc	400	458.257
September 2007	Fecal Coliform	7D Conc	400	409.267
September 2007	Fecal Coliform	7D Conc	400	894.427
March 2008	Total Suspended Solids	30D Qty	35.4	36.1281
March 2008	Total Suspended Solids	7D Qty	54.1	84.2393
June 2008	Total Suspended Solids	30D Conc	17	62.28
June 2008	Total Suspended Solids	7D Conc	26	151.475
June 2008	Total Suspended Solids	30D Qty	35.4	257.178
June 2008	Total Suspended Solids	7D Qty	54.1	639.646
June 2008	Fecal Coliform	30D Conc	200	385.293
June 2008	Fecal Coliform	7D Conc	400	1069.69
June 2008	CBOD 5 day	7D Qty	43.7	69.8678
June 2008	Fecal Coliform	7D Conc	400	993.478

#### Items Noted During the Inspection (Items for Correction in Bold Type)

1. The influent and effluent automatic composite samplers did not contain a thermometer. To ensure the required sample holding temperature of  $\leq 6^{\circ}\text{C}$  is being achieved, there must be a thermometer (with the tip immersed in a liquid and not touching anything) in the sampler. For quality assurance/quality control purposes, the Village must also record daily temperature readings from both automatic samplers.  
**The Village must begin this protocol without delay but no later than September 5, 2008.**

2. Part 1(C)(A3), of the Village's NPDES permit compliance schedule states the following:

*Based on an evaluation of mercury data for outfall 1PD00022001 collected using Method 1631, the permittee shall submit one of the following to Ohio EPA not later than 19 months from the effective date of this permit (Event Code 88899):*

a. *(updated language) A letter stating that the discharge is able to comply with the water quality standard for mercury for average criteria of 12 ng/l; or*

b. *If the permittee believes that it will be able to take actions leading to compliance with the water quality based effluent limits for mercury included in this NPDES permit, it may submit a request to modify the NPDES permit to include a schedule of compliance and an interim effluent limit for mercury; or*

c. *If the permittee determines that compliance with the water quality based effluent limits for mercury included in this permit is not possible without the construction of expensive end-of-pipe controls, a variance from the mercury water quality standards is available under section D(10) of rule 3745-33-07. If the permittee determines it is eligible, it may submit an application for coverage under this mercury variance. Section D(10)(a) of rule 3745-33-07 includes information on eligibility for coverage and lists the information that must be included in the application; or*

d. *If the permittee determines that compliance with the water quality based effluent limits for mercury included in this permit is not possible, and it is not eligible for coverage under the mercury variance available at section D(10) of rule 3745-33-07, it may submit an application for an individual variance from water quality standards. Section (D)(1-3) of rule 3745-33-07 provides information on the applicability and conditions of an individual variance. Section (D)(4) of the rule lists the information that must be included in the application.*

- Part 1, (C)(B1) states the following:

a. *No later than 6 months after the effective date of this permit, the permittee shall submit a plan to the Ohio EPA Southwest District Office, describing the measures to be taken to achieve compliance with final effluent limitations for copper and zinc at outfall 1PD00022001.(Event Code 1299)*

*b. This plan shall contain details for locating, isolating and eliminating sources of the above pollutants to the sanitary sewers. It shall also include a schedule for implementation of the plan that specifies a deadline for compliance with final effluent limitations for these parameters at outfall 1PD00022001. This deadline for compliance with the final effluent limitations for these parameters shall not be later than 36 months after the effective date of this permit. When approved by Ohio EPA, this agreed-upon schedule shall be incorporated by reference as part of this permit.(Event Code 5699)*

To date, Ohio EPA has not received the required information. For this reason, a rating of "Unsatisfactory" was given for the "Compliance Schedule" section of this report.

**This information must be submitted to this office as soon as possible, but no later than September 19, 2008.**

\*During this inspection process, Ohio EPA discovered that maximum daily limit for copper of 17ug/l in the NPDES permit was calculated in error. The actual limit is should be 34 ug/l. The limit for zinc was calculated incorrectly as well; as there should be monitoring only with no numeric limit. Ohio EPA has initiated the process to modify the existing NPDES permit for copper and zinc.

The Village should address the compliance schedule reporting requirements based on this updated information.

3. During precipitation events, extraneous water enters the Village's sewage collection system. During periods of rain or snow melt, influent flows at the WWTW can exceed 3 times the average daily design flow. These periods of high flow have caused NPDES permit violations because of the WWTW's inability to adequately treat at these levels.

The Village has been aware of the rain derived inflow & infiltration (RDII) issues in the sewage collection system for a long period of time. Consultants performed smoke testing performed in the late 1990s and a 2002-collection system flow monitoring study was also completed.

The Village has an active program of identifying and remediating RDII sources within the collection system such as the River Pines Resort RV park (shuts the park pump station down in the off-season so there is no chance that river water will be pumped into the collection system during high river stages). The Village has also applied for a grant to reline portions of Caroline, Columbia and Washington streets (3500 lineal feet). The contractor will not only clear and reline the sewer but also do cut outs for active laterals only; several "dead" laterals are still connected to the current sanitary sewer, which is a source of RDII.

The Village should continue to document work that is performed in RDII reduction. Documentation is currently stored in the Village administration office.

If wet weather violations at the WWTW become persistent, the Village will be required to evaluate other options such as flow equalization at the WWTW.

4. Operational staff was unsure when the influent magnetic flow meter was last calibrated. For this reason, a rating of "Marginal" was given for the "Flow Measurement" portion of this report. The NPDES permit for the WWTW requires accuracy in discharge flow measurement and it is Ohio EPA's stance that all primary flow measurement devices shall be calibrated on an annual basis.

**The Village shall complete the calibration of the influent mag meter by no later than September 19, 2008, and then establish a protocol for annual calibration.**

5. When the NPDES permit is renewed next (2011), the Operator of Record for the WWTW will be required to be on the plant grounds 20 hours per week. The Village should invest in another certified operator (if only a Class I) either by hiring or by training from within the existing staff. This will allow more scheduling flexibility with the existing operator of record. The Village should review Ohio Administrative Code 3745-7, in order to plan accordingly.