

**Environmental
Protection Agency**

Gov. Strickland, Governor
Lt. Ritchie, Lt. Governor
Chris Korte, Director

June 14, 2010

Village of West Liberty
Board of Public Affairs
P.O. Box 187
West Liberty, Ohio 43357

**RE: West Liberty Reconnaissance Inspection / Notice of Violation, NPDES
Permit No. 1PC00012*FD/OH0022098, Logan County**

Dear Board Members:

On June 8, 2010 Joe Reynolds conducted a Reconnaissance Inspection at the West Liberty waste water treatment plants. The inspection was conducted as part of the National Pollutant Discharge Elimination System (NPDES) permit renewal process.

The village is currently in violation of the NPDES compliance schedule. Violations of permit schedule items are considered significant violations. Immediate action must be taken to resolve this non-compliance.

The findings from the inspection are included in the attached report. The report includes two items that require a response. Please provide a written response by the date(s) noted. If you have any questions regarding the report, please call Mr. Reynolds at (937) 285 - 6097.

Sincerely,



Martyn Burt
Compliance Supervisor
Division of Surface Water

cc: Bob Harrison, Plant Superintendent



State of Ohio Environmental Protection Agency
Southwest District Office

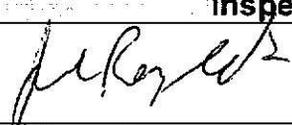
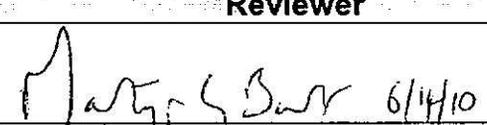
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PC00012*ED	OH0022098	6/8/2010	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
West Liberty WWTP 1050 County Road 262 West Liberty, Ohio	10:00 AM	1/1/2006
	Exit Time	Permit Expiration Date
	12:10 PM	12/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Robert Harrison, Plant Superintendent	(937) 465 - 1506	
Name, Address and Title of Responsible Official	Phone Number	
Boeard of Public Affairs Village of West Liberty P.O. Box 187 West Liberty, Ohio 43357	(937) 465 - 2716	

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

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

Inspector	Reviewer
 6/14/10	 6/14/10
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Inspection Findings

The village of West Liberty owns and operates a waste water treatment plant located at 1050 County Road 262. The village holds National Pollutant Discharge Elimination System (NPDES) permit number 1PC00012*ED for the waste water discharge.

The village's NPDES permit will expire on December 31, 2010. A permit renewal application was submitted on April 1, 2010. This inspection was conducted as part of the permit renewal.

The NPDES permit contains a compliance schedule for the elimination of sanitary sewer overflows. The schedule includes the following dates:

1. Develop Infiltration and Inflow work Plan by Aug. 1, 2009.
(completed 12/24/2008).
2. Complete work plan activities by June 1, 2010. (in progress).
3. Submit Infiltration / Inflow summary report by Aug. 1, 2010.
(pending)
4. Eliminate overflows and bypasses by October 1, 2010. (pending)

The Village has completed several infiltration and inflow projects as part of the work plan. However, the village will not meet the following schedule dates: completion of work plan activities (6/1/2010), submit summary report (8/1/2010), and eliminate overflows (10/1/2010). Additional time through the end of 2013 was requested.

Work plan activities that have been implemented include: sequencing of lift station pumping to use in line storage, annual I/I budget (\$15,000 / year), sewer lining project East Beard Street, smoke and TV testing Beard and Detroit streets, back flow prevention ordinance, lateral grouting, and work with Greene Hills nursing home (grease control program). There have been no sanitary sewer overflows so far this year. Two overflows the previous year were attributable to breaks and blockages.

Inspection Findings (continued)

The renewal NPDES permit will include the following changes: monitoring for e-coli, operator of record minimum staffing requirements, outfall signage, ceiling limits for sludge station 501. A Waste load Allocation will be performed as part of the permit renewal. This information will be used to determine if the existing permit limits are protective / adequate.

Under the new operator rules the plant will need to be staffed by a Class II certified operator a minimum of 5 days per week, 20 hours per week. Consideration should be given to the establishment of a back-up operator (min. Class I) to provide coverage when the Class II operator is out on leave.

The plant has experienced some operational problems with clarifier solids entering the chlorine contact tank. The cause of the solids carryover needs to be evaluated. System design capacity with respect to flow fluctuations needs to be evaluated.

The village is about to begin a CUP (Check Up Program) for small system as part of a long term planning process (20 year of design life). Equipment and treatment needs will be evaluated as part of the study. Most of the system is over 35 years old.

The new head works screening system has worked well. There were a couple operational issues associated with removal of fecal material and icing in winter. The fecal issue was partially addressed by switching the solid waste pick up schedule (thus moving the material location in the truck). The freezing was addressed by adding heat lamps last winter. Long term the village is looking at enclosing the open side of the system.

All of the waste activated solids were land applied in 2009. A total of 117 dry tons of solids were land applied. There were 46 dry tons of waste activated solids and 71 dry tons of lime sludge that make up the total.

In review of effluent data from January 1, 2009 thru April, 2010 there were no final effluent limitations violations.

Items Requiring a Response

1. A written request to have the following NPDES permit schedule dates changed must be submitted to the district office immediately.
 - Complete work plan activities.
 - Submit Infiltration / Inflow summary report.
 - Eliminate overflows and bypasses.

This request should include new proposed dates. Upon approval the dates will be incorporated into the existing permit and the renewal permit.

2. A schedule for implementation of a treatment system evaluation with respect to capacities and design life must be submitted to this office by no later than July 19, 2010. The system evaluation must include findings as to the cause and control of secondary solids carry over to the tertiary treatment system. This information can be developed as part of the CUP study.

