



State of Ohio Environmental Protection Agency

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1PB0001320091216

MIAMI

COVINGTON WWTP

MILLER, JOSEPH

2009/12/16

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



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 Korteski, Director

December 16, 2009

Mayor and Council
Village of Covington
1 South High Street
Covington, OH 45318

**RE: Compliance Evaluation Inspection (CEI)
Village of Covington Wastewater Treatment Plant
NPDES Permit 1PB00013*FD/OH0020761
Covington, Miami County**

Mayor and Council:

On December 7, 2009, Jacob Howdysshell and I conducted a Compliance Evaluation Inspection at the Village of Covington wastewater treatment works. This inspection was conducted to determine compliance with the NPDES discharge permit. Butch Boeringer, WWTP Superintendent, and Rick Canan, Operator, represented the Village during the inspection.

Overall the facility was rated as "Satisfactory". A detailed inspection report is attached.

Provide a response to the "Items Requiring a Response" section of the inspection report by **January 14, 2010**. Your response should include items completed or planned to be completed to address identified issues. If you have any questions, I can be reached at (937) 285-6109 or joe.miller@epa.state.oh.us.

Sincerely,

Joe Miller
Division of Surface Water
Compliance and Enforcement

CC: Covington Board of Public Affairs

ec: Butch Boeringer
Miami County Health Department
Jacob Howdysshell, CO-DSW

**Village of Covington WWTP
Compliance Evaluation Inspection
December 7, 2009
Overview**

The Covington wastewater treatment plant (WWTP) serves a population of 2603. The WWTP treatment train is as follows: communitation, grit removal by pistagrit (out of service), preaeration, primary sedimentation, trickling filters – rock media, intermediate sedimentation, activated sludge, secondary sedimentation, chlorination, dechlorination, and post aeration. The discharge from the WWTP is to the Stillwater River just downstream of the confluence of Greenville Creek.

The wastewater plant is staffed by four operators five days a week for eight hours a day with weekend checks. Staff and certifications are: Butch Boeringer, Class III; Ray Kimmel, Class III; Bob Chaney, Class I; and Rick Canan, Operator in Training.

Effluent Violations

From August 2007 to October 2009, the only reported effluent violations were both weekly and monthly loading of total suspended solids in March 2008. These violations were associated with a storm event that resulted in flow to the wastewater treatment plant of 2 MGD.

During high stream flow conditions in both January 2008 and February 2008, the WWTP overflowed to a storm drain prior to the trickling filters but following primary settling. These bypasses of treatment were reported as required by the NPDES permit.

An anonymous complaint in 2007 alleged the discharge of sludge from the Covington WWTP outfall. The operators suspect this may have been caused by sludge accumulation in the chlorine contact tank. In order to prevent this discharge in the future, the frequency the chlorine contact tank is cleaned out should be increased. Currently it is only cleaned out once a year, prior to disinfection season. At the time of inspection, rising sludge was observed in the chlorine contact tanks.

Infiltration and Inflow

As evidenced above, infiltration and inflow into the collection system during large storm events results in flows that exceed the design capacity of the wastewater treatment plant. A comprehensive infiltration and inflow (I/I) removal program needs to be implemented. The I/I program should be system-wide, covering public and private sewers, laterals, downspouts, and foundation drains. Smoke and/or dye testing of sewers should be used to identify problem areas along with flow measurement and CCTV as appropriate. Annual funding should be set aside for I/I removal programs. Funding should be specifically allocated for relining a certain number of sewer lines and manholes per year (as appropriate).

High Stream Flow

High levels in the Stillwater River during large storm events causes the effluent line to backup, preventing adequate discharge of effluent and compounding issues with high I/I wastewater flows. A means to prevent backup of the effluent line should be evaluated (i.e. duck-bill, flap-gate, or effluent pumping).

Stillwater River Watershed TMDL

As discussed in previous correspondence, the Covington NPDES permit contains a Schedule of Compliance for meeting total phosphorus limits allocated in the Stillwater River Watershed TMDL Report. Recently, a modified TMDL was approved by USEPA which eliminates total phosphorus limitations from the NPDES permit. A modification of the Covington WWTP NPDES permit without total phosphorus limitations takes effect on January 1, 2010.

The 2009 TMDL revision removes total phosphorus limitations from the Covington WWTP NPDES permit and other Stillwater River mainstem dischargers because this section of the river is currently in attainment of the aquatic life use designations.

Laboratory

Following my last inspection, the WWTP established a QA/QC program to ensure analyses conducted are accurate. I provided a copy of a laboratory inspection checklist to facilitate further review of sampling, testing, and reporting of wastewater parameters.

Items Requiring a Response

- 1) **I/I Program** – Provide a plan for addressing I/I in the collection system. Include specifics as described in the “Infiltration and Inflow” section above. Provide a summary of funding allocated for I/I projects for each of the next five years. Provide a list of priority areas in the collection system for I/I projects.
- 2) **High Stream Flow** – Provide a plan and schedule for implementation for addressing back-up of the wastewater plant during high stream flows.
- 3) **Chlorine Contact Tank** – Provide an SOP for cleaning the chlorine contact tank including frequency.
- 4) **Operator of Record (ORC) Form** – Complete and return.
- 5) **Screening/Grit Removal** – At the time of inspection, the Pistagrit was out of service and repair appears unlikely due to cost and age of the unit. I understand wastewater improvements are being evaluated including the replacement of the screening and grit removal units. Provide anticipated dates for submittal of a permit to install for improvements and subsequent installation.



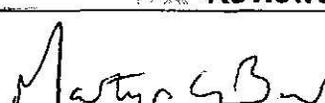
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00013*FD	OH0020761	12/7/09	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Covington WWTP 200 Bridge Street Covington, Ohio 45318	10:10 AM	June 1, 2006
	Exit Time	Permit Expiration Date
	12:30 PM	May 31, 2011
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Butch Boeringer, WWTP Superintendent Rick Canan, Operator		937-473-2104 937-473-2104
Name, Address and Title of Responsible Official		Phone Number
Mayor and Council Village of Covington 1 South High Street Covington, OH 45318		937-473-3420

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached.	
Inspector	Reviewer
 Date 12-16-09	 Date 12/17/09
Joe Miller Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: Error! Reference source not found.
NPDES #: Error! Reference source not found.

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..... 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:

-During high stream flow, WWTP experiences backup due to stream level. A flap-gate or duckbill addition to the outfall should be evaluated to prevent backups. Effluent pumping for high stream conditions should also be considered.
-High stream conditions on January 9, 2008, and February 4 to February 7, 2008 resulted in a bypass of treatment prior to the trickling filters.

Section F: Compliance

- (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
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Compliance Schedule for TMDL modeled phosphorus limitations is being removed by permit modification, effective January 1, 2010. The revised TMDL, approved by USEPA in 2009, removes total phosphorus limitations for publicly owned treatment works that discharge to the sections of the Stillwater River that were found to be in attainment of their designated use.

The only reported effluent limitation violations during the period of review (August 2007 to October 2009) were total suspended solids (TSS) loading violations during high flow event in March 2008.

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 (power only)
- (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..... Y
- (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 (pistagrit)
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... Y
- (l) Regulatory agency notified of bypasses..... Y
On eDMRs and/or Spill Hotline (1-800-282-9378) (contact inspector)
- (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)

Bound (suggest combining daily check log and ORC logbook)
- (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)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (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..... N

Permit #: Error! Reference source not found.
NPDES #: Error! Reference source not found.

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (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..... N

Comments/Status:

-Portable pumps for sewer relief obtained from local contractors as needed.
-PTI recently approved for Walnut Street new sewer lines.
-Storm lines replaced in the Walnut Street area approximately 2 years ago.
-Basement backup near school (should be addressed by above projects)
-Three (3) lift stations have audio/visual alarms that are checked daily.
- All flow to WWTP travels by siphon under the Stillwater River
-Lift station locations: High School (East End), Ballinger, and South town
-PBM Nutritionals, manufacturer of infant formula, has moved into the facility previously occupied by Kerry Ingredients.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method: hauling to another NPDES facility)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name: Mike's Sanitation)
- (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/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)..... N/E

Comments/Status:

Jacob Howdyshell, CO-DSW, reviewed the sludge program and will be providing a separate sludge inspection report.
Facility current has liquid sludge hauled by Mike's Sanitation.
Evaluating the possibility of dewatering sludge by polymer/geotextile bags.

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: 4/30/09)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range
of flows..... Y up to 1,000 GPM
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Permit # : Error! Reference source not found.
NPDES # : Error! Reference source not found.

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: nitrogen-ammonia, total phosphorus, oil and grease, mercury, sludge parameters

Lab name: Belmont 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:
Lab inspection checklist sent to assist evaluation of laboratory practices and recordkeeping.

Permit # : Error! Reference source not found.
 NPDES #: Error! Reference source not found.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	yes	no	no	no	no	no	clear	n/a

Comments/Status:

Anonymous complaint received in 2007 regarding discharge of sludge to Stillwater River from Covington WWTP outfall. Operator believes accumulation of sludge in chlorine contact tank caused this to occur. Recommend increased frequency of cleaning the chlorine contact tank to prevent sludge accumulation and discharge. Current practice is to clean tankage prior to disinfection season. At minimum, the tanks should be cleaned before and after disinfection season. At the time of inspection, rising sludge was observed in the chlorine contact tanks.

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

Comments/Status:



Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit

Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #: _____ STU # _____ Classification: _____

 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	

Village of Covington WWTP Flow (MGD) July 2007 to October 2009

