



State of Ohio Environmental Protection Agency

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1PC0001120081020

MIAMI

WEST MILTON WWTP

MILLER, JOSEPH

2008/10/20

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



State of Ohio Environmental Protection Agency

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

October 17, 2008

Mayor and Council
Village of West Milton
701 South Miami Street
West Milton, OH 45383

**RE: NOTICE OF VIOLATION
Compliance Evaluation Inspection (CEI)
Village of West Milton Wastewater Treatment Plant
NPDES Permit 1PC00011*GD/OH0021857
West Milton, Miami County**

Mayor and Council:

On October 6, 2008, Bob Ostendorf and I conducted a Compliance Evaluation Inspection at the Village of West Milton wastewater treatment works. This inspection was conducted to determine compliance with the NPDES discharge permit. Tim Schwartztrauber, Utilities Superintendent, Don Knife, Chief Operator, and Cory McCarroll, Maintenance, represented the Village during the inspection.

Overall the facility was rated as "Marginal" due to continuing non-compliance with effluent limitations and poor operations and maintenance. A detailed inspection report is attached.

Provide a response to the "Items Requiring a Response" section of the inspection report by **November 10, 2008**. 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: Miami County Health Department
Tim Schwartztrauber, Utilities Superintendent



**Village of West Milton WwTP
Compliance Evaluation Inspection
October 6, 2008**

Overview

The West Milton wastewater treatment plant (WWTP) serves a population of 4800. The WWTP consists of communitors, grit removal, primary sedimentation (Clarigester), trickling filters, nitrification towers, secondary settling, and ultraviolet disinfection. Influent flows that exceed 2.6 MGD are diverted to a 1.7 million gallon equalization lagoon. Flow from the EQ is diverted back to the WWTP as storm flows subside. The discharge from the WWTP is to a small tributary and then the Stillwater River.

Operations and Maintenance/Staffing

Operations and Maintenance was rated as "Unsatisfactory". The skimmer arm on one of the primary settling tanks was not functioning. Grit removal was not functioning. The plant was badly rusted. Electrical components were corroded and in need of replacement. Grinder pumps from the primary settling tank are unable to pump out the collected solids. Solids were overflowing the final setting tank weirs. Process control testing is no longer being conducted to ensure proper operations.

Operations and Maintenance of the WWTP has been cited as an issue in the last two Ohio EPA inspections and conditions do not appear to be improving. The O & M plan for this facility identifies a minimum staffing of three people at the WWTP. The three current employees have the following duties in addition to operation of the WWTP: water lines and distribution system, wastewater collection, water main breaks, sewer backups, grass cutting at several facilities (acres of property), leaf collection, snow removal, inspection of construction projects, and water meter readings. Clearly these employees are overextended and the maintenance of the WWTP has suffered.

Preventative maintenance is largely ignored on the wastewater plant due to staffing shortfalls. Failure to do preventative maintenance results in breakdowns and expensive repairs that may have been avoided or delayed. A preventative maintenance program needs to be implemented.

Allocation of funding to the wastewater plant should be examined. Currently the money budgeted to the wastewater plant is not sufficient to provide proper maintenance. Sewer rates may need to be examined if the availability of funds is in question.

Effluent Violations

During the period of January 2006 to August 2008, twenty-one (21) Fecal Coliform and eight (8) dissolved oxygen effluent violations were reported. New ultraviolet bulbs were installed in 2008. Since the installation, no Fecal Coliform violations have been reported. There is currently no plan for addressing dissolved oxygen violations. Addition of some means of post-aeration should be evaluated.

Numerous effluent frequency violations were reported from January 2006 to January 2008. It appears that many of these were due to confusion on how the reporting weeks aligned with the days that samples were being taken. Since January 2008 there have been no frequency violations to date.

Infiltration and Inflow

Infiltration and inflow into the collection system during large storm events results in flows in excess of 3.0 MGD. In 2001, storm augmented flow to the WWTP exceeded the capacity of the equalization basin and overflowed the banks. West Milton is located on shallow bedrock, with areas that have old sewers installed in rock. In many cases these sewers become conduits for storm water. Also, downspouts and other illegal clean water connections to the sanitary sewer are common.

An aggressive and 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. An annual report summarizing efforts towards I/I removal projects should be sent to Ohio EPA. The annual report should also outline I/I removal projects planned for the upcoming calendar year.

Compliance Schedule

The NPDES permit includes a compliance schedule for meeting a total phosphorus effluent limitation of 1.0 mg/l three years after the effective date of the permit. The effective date of the permit was March 1, 2006. Interim milestones that have not been met as required are:

1. Immediately evaluate the capability of the current WWTP to reduce effluent loadings of total phosphorus. Operational, unit process configuration, and other measures shall be evaluated.
2. Not later than March 1, 2007, implement measures identified in the evaluation that can reasonably be expected to maximize the ability of the existing treatment facilities to achieve a final effluent limit of 1.0 mg/l total phosphorus (30 day average). Obtain PTIs as necessary.
3. If the reduction target of 1.0 mg/l is not met by implementing the measure identified in the evaluation, not later than September 1, 2007, submit a general plan to achieve the final effluent limit to Ohio EPA. The minimum requirements of the general plan are listed in the NPDES permit schedule of compliance.

Failure to meet the NPDES schedule of compliance is grounds for enforcement action.

Items Requiring a Response

- 1) Effluent Limitation Violations – Provide the reasons for the listed violations, as well as a description of the action taken or proposed to prevent further violations. Future violations need to be reported as per your NPDES Permit. See Part III, Item 12 of your NPDES Permit, entitled “Non-Compliance Notification”.
- 2) Staffing – Staffing improvement have been cited as a need in past Ohio EPA inspections, but this has not be adequately resolved. Provide a schedule for bringing the facility up to full staffing levels.
- 3) WWTP Repairs – Provide the date that the skimmer arm, brush auger, and skimmed solids pump were replaced/repared.

- 4) Operations and Maintenance – A preventative maintenance program needs to be implemented. Provide a description and initiation date of the preventative maintenance program West Milton will be using.
- 5) QA/QC – A quality assurance/quality control manual has not been prepared for the wastewater laboratory methods. Provide a schedule for preparing this document.
- 6) Total Phosphorus – Provide an update on coming into compliance with the schedule in the NPDES permit.
- 7) I/I Program – An I/I study needs to be completed with priority areas identified. Once completed, a long term plan needs to be provided identifying the areas to be addressed by calendar year with allocated funds for the program. Provide an expected date for contracting the I/I study.

Permit #: 1PC00011*FD...011*FD
 NPDES #: OH0021857



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
1PC00011*FD	OH0021857	10/6/08	C	S	I

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of West Milton WWTP 898 South Miami Street West Milton, OH 45383	12:20 PM	March 1, 2006
	Exit Time	Permit Expiration Date
	3:05 PM	February 28, 2011
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Tim Schwartztrauber, Utilities Superintendent Don Knife, Chief Operator Cory McCarroll, Maintenance		937-698-4884
Name, Address and Title of Responsible Official		Phone Number
Mayor and Council Village of West Milton 701 South Miami Street West Milton, OH 45383		937-698-4884

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

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

Operations and Maintenance rated as "Unsatisfactory".
 Effluent/Receiving water rated as "Marginal" due to continued effluent violations.
 Collection system was rated as "Marginal" due to excessive I/I

Inspector	Reviewer
 Date: 10/17/08 Joseph Miller Division of Surface Water Southwest District Office	 Date: 10/29/08 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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..... N
- (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:

Flows exceed WWTP design flow capacity during wet weather. WWTP design flow is 1.2 MGD, with an average flow of 0.92 MGD over the past two years. Flows during storm events have been up to 3.3 MGD.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y/N
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... No

Comments/Status:

Self monitoring reports during the past two years include frequent Fecal Coliform and dissolved oxygen violations. New ultraviolet bulbs installed in 2008 are intended to prevent future Fecal Coliform violations. A plan to prevent dissolved oxygen violations needs to be determined.

Compliance schedule for total phosphorus reduction in NPDES. Initial compliance milestones have not been met (see report for details).

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)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: II
- (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... N*
- (i) Any major equipment breakdown since last inspection..... N
- (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)
- (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)... N/A
 - 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*

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..... Y

Comments/Status:

Residence on Williams Drive basement backup, first home upstream on main line to WWTP.

Sanitary sewer overflows must be reported as required by the NPDES permit.

Details regarding WWTP concerns are described in the inspection summary.

Routine and preventative maintenance not being conducted.

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)
- (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/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)..... Y

Comments/Status:

Total volume of aerobic digesters is 348,000 gallons. Of this amount, 108,000 gallons is needed for effective digestion of 75 days, leaving 240,000 gallons for sludge storage. Since switching from land application of sludge to hauling, sludge storage has no longer been problematic.

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: 1/year)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows (0-5 MGD) Y
- (e) Actual flow discharged is measured..... N
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Flow meter is located at influent after the comminutor/screening units. Effluent flow monitoring planned in 2004 not completed.

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: Metals, phosphorus, O&G, Fecal Coliform

Lab name: Belmonte Laboratories

Quality Control/Quality Assurance

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

Date:

Comments/Status:

A QA/QC program needs to be developed for this facility.

Recommend West Milton WWTP participate in annual DMR-QA program. DMR-QA evaluates the analytical and reporting ability of the laboratories that routinely perform inorganic chemistry self-monitoring analyses required by their NPDES permit. More info at <http://www.epa.gov/oecaerth/monitoring/programs/cwa/dmr/index.html>

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	No	No	No	Slight	yes	Clear	Sludge deposits

Comments/Status:

Excessive algae noted at discharge as well as sludge solids.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N/E
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N/E
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N/E
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N/E
- (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

West Milton WWTP Effluent Limit Violations January 2006 to August 2008

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2006	31616	Fecal Coliform	30D Conc	1000	1938.34	9/1/2006
September 2006	31616	Fecal Coliform	7D Conc	2000	3202.66	9/1/2006
September 2006	31616	Fecal Coliform	7D Conc	2000	2034.82	9/8/2006
October 2006	31616	Fecal Coliform	30D Conc	1000	2318.98	10/1/2006
October 2006	31616	Fecal Coliform	7D Conc	2000	5350.11	10/15/2006
October 2006	31616	Fecal Coliform	7D Conc	2000	4320.32	10/22/2006
June 2007	00300	Dissolved Oxygen	1D Conc	6.0	5.49	6/18/2007
July 2007	31616	Fecal Coliform	7D Conc	2000	2383.63	7/22/2007
August 2007	31616	Fecal Coliform	30D Conc	1000	2665.78	8/1/2007
August 2007	31616	Fecal Coliform	7D Conc	2000	2526.12	8/1/2007
August 2007	31616	Fecal Coliform	7D Conc	2000	3643.30	8/8/2007
August 2007	00300	Dissolved Oxygen	1D Conc	6.0	5.98	8/9/2007
August 2007	31616	Fecal Coliform	7D Conc	2000	2658.43	8/22/2007
September 2007	31616	Fecal Coliform	30D Conc	1000	10807.9	9/1/2007
September 2007	31616	Fecal Coliform	7D Conc	2000	10206.1	9/1/2007
September 2007	31616	Fecal Coliform	7D Conc	2000	14664.5	9/8/2007
September 2007	31616	Fecal Coliform	7D Conc	2000	8631.00	9/15/2007
September 2007	31616	Fecal Coliform	7D Conc	2000	10562.7	9/22/2007
October 2007	31616	Fecal Coliform	30D Conc	1000	9875.51	10/1/2007
October 2007	31616	Fecal Coliform	7D Conc	2000	7316.61	10/1/2007
October 2007	31616	Fecal Coliform	7D Conc	2000	4350.97	10/8/2007
October 2007	31616	Fecal Coliform	7D Conc	2000	13789.3	10/15/2007
October 2007	31616	Fecal Coliform	7D Conc	2000	16004.1	10/22/2007
July 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.96	7/31/2008
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.88	8/12/2008
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.82	8/13/2008
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.77	8/25/2008
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.93	8/26/2008
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.98	8/29/2008



