



State of Ohio Environmental Protection Agency

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MONTGOME NEW LEBANON STP

SARLE, EDWARD | 2008/04/10

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

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State of Ohio Environmental Protection Agency

Southwest District Office

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

April 9, 2008

Mr. George Markus, Municipal Manager
Municipality of New Lebanon
198 South Clayton Road
New Lebanon, Ohio 45345

Re: Montgomery County, New Lebanon WWTP, Compliance Evaluation Inspection

Dear Mr. Markus:

On March 19, 2008, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0026697; OEPA Permit No. 1PB00021*HD). Representing this facility was Matt Fraley and Scott Brock. A copy of my inspection report is enclosed.

The inspection report contains one unsatisfactory area and three marginal areas. The Records / Reports section was rated unsatisfactory as a result of the failure to correctly report the WWTP bypasses and effluent violations. The Permit section was rated marginal as a result of the WWTP bypasses noted for February and March 2008. The Effluent / Receiving Waters section was rated marginal as a result of the NPDES Permit violations. The Compliance Schedule was rated marginal as a result of the violations of the Director's Final Findings and Orders.

The areas noted in the report summary will require a written response by May 9, 2008. The response should include a description of the proposed actions and the dates for completion of these actions.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosures

cc: Matt Fraley, WWTP Operator





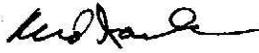
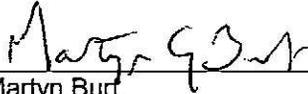
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00021*HD	OH0026697	3/19/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
New Lebanon WWTP 200 Hepner Avenue New Lebanon, Ohio 45345	1:00 P.M.	10/1/2005
	Exit Time	Permit Expiration Date
	2:05 P.M.	9/30/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Matt Fraley, WWTP Operator Scott Brock, Sewer System Department Foreman	(513) 673-9127 (937) 687-1341	
Name, Address and Title of Responsible Official	Phone Number	
Mr. George Markus, Municipal Manager Municipality of New Lebanon 198 South Clayton Road New Lebanon, Ohio 45345	(937) 687-1341	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
M	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	S	Laboratory	M	Compliance Schedule
S	Operations & Maintenance	M	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 Summary of Findings / Comments.	
Inspector	Reviewer
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4/9/08 Date	4/10/08 Date



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NPDES #: OH0026697

Summary of Findings / Comments

Areas Requiring a Response

A review of the Monthly Operating Reports (MORs) for January 2006 through February 2008 indicated several violations. These violations are listed on Attachment I. The New Lebanon WWTP (New Lebanon) failed to report these violations in accordance to the NPDES Permit. New Lebanon must address these violations. Finally, future violations must be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The WWTP discharge flow rate is monitored using an ultrasonic level sensor and weir. The flow meter was inoperable between January 13 and March 31, 2007. Please address the reason the flow meter was broken and why it could not be fixed sooner.

The WWTP is designed for an average daily flow rate of 800,000 gpd and a peak daily flow rate of 3.0 MGD. A review of the January 2006 through February 2008 MORs indicated that the average and peak daily flow rates were 430,000 gpd and 2,150,000 gpd. The Ohio EPA is concerned about the high peak flows. This is an indication that infiltration and inflow (I/I) is a problem for the sewage collection system. As more flows are added to the system, the peak flows may exceed the WWTP peak flow rate. New Lebanon must have an aggressive I/I control program. Please indicate what actions New Lebanon is taking to control the I/I.

During the inspection, the flow equalization basin was overflowing. The wastewater flowed across the maintenance building parking lot prior to discharging to Little Bear Creek. WWTP staff was unaware of the reporting requirements for this bypass. All sewage collection or treatment system bypasses must be reported as required by the NPDES Permit as detailed in Part III, Section 11 and 12 titled "Unauthorized Discharges" and "Noncompliance Notification." The NPDES Permit requires these bypasses to be reported by phone within 24 hours of occurring and a written report within 5 days of the event. New Lebanon submitted this written notification on March 24, 2008.

The flow equalization basin also bypassed sometime in February 2008. New Lebanon must submit the written report addressing this bypass. Finally, New Lebanon must review their records for 2006 through 2008 to determine if any additional bypasses have occurred from the sewage collection and treatment system. If any additional events are documented, New Lebanon must also report these bypasses.

Please indicate if the existing earthen flow equalization basin is lined in some manner. Please also indicate when this basin was constructed.

During the inspection, storm water runoff discharging to the diversion chamber was noted. Storm water may also be entering the chlorine contact tank. New Lebanon must



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take all possible action to prevent storm water entering the sewage collection and treatment system. Please indicate what actions are being proposed to eliminate these sources of I/I.

The WWTP certified operator must maintain an operator log in accordance with Ohio Administrative Code 3745-7-09. A copy of this rule is enclosed. New Lebanon has failed to maintain this log and must begin to do so immediately.

Areas Not Requiring a Response

The WWTP consists of a bar screen, fine screen, oxidation ditch, secondary clarifier, post aeration, chlorination and dechlorination. The fine screen screw press was broken at the time of inspection. A flow equalization basin is also provided for excess influent flows. Aerobic sludge digestion tanks, a sludge holding tank and a sludge filter press are also provided. The sludge is then land applied. New Lebanon contracts with Miller Brothers to remove the sludge. In 2006, a total of 7.17 dry tons was land applied on farms in Montgomery County.

Belmont Park and the Eaton WWTP conduct the oil & grease, fecal coliform and metal testing. WWTP staff conducts the TSS, CBOD5, ammonia, DO, temperature, chlorine and pH testing. For the in house testing, the temperature is not recorded for the refrigerator, oven and incubator. These temperatures must be monitored and recorded to ensure proper preservation and testing.

On September 3, 1997, the Ohio EPA issued Director's Final Findings and Orders addressing the New Lebanon WWTP. The orders noted effluent violations, WWTP bypasses and the failure to report WWTP bypasses. New Lebanon was required to eliminate by December 30, 1998 all effluent violations, WWTP bypasses and reporting violations. New Lebanon was also required to comply with all NPDES Permit requirements. The NPDES Permit violations noted in this inspection report are also considered to be violations of the effective Director's Final Findings and Orders.



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Attachment I
New Lebanon WWTP
Effluent Limit Violations for January 2006 through February 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
July 2006	Fecal Coliform	Monthly	#/100ml	1000	"AK"
July 2006	Fecal Coliform	Weekly	#/100ml	2000	"AK"
July 2006	Fecal Coliform	Weekly	#/100ml	2000	"AK"
October 2006	Fecal Coliform	Weekly	#/100ml	2000	"AK"
September 2007	Fecal Coliform	Weekly	#/100ml	2000	"AK"



Recordkeeping requirements and responsibilities of a certified operator.

- (A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment works, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.
- (1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
 - (2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.
 - (3) At a minimum, the following information shall be recorded:
 - (a) Identification of the public water system, sewerage system, or treatment works;
 - (b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
 - (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;
 - (d) Results of tests performed and samples taken, unless documented on a laboratory sheet;
 - (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and
 - (f) Identification of the persons making entries.
 - (4) The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.

(B) A certified operator shall:

- (1) Perform their duties in a responsible and professional manner consistent with standard operating procedures and best management practices;
- (2) Operate and maintain public water systems; sewerage systems, treatment works, and appurtenances so as not to endanger the health or safety of persons working in or around the facility, the public at large, or the environment due to negligence or incompetence; and
- (3) Report all instances of noncompliance with applicable regulations to the operator of record or facility supervisor.

(C) The duties of an operator of record shall include, but not be limited to, those outlined in paragraphs (B)(1) to (B)(3) of this rule and the following additional duties and responsibilities:

- (1) Responsible and effective on site management and supervision of the technical operation of the public water system, treatment works, or sewerage system;
- (2) Immediately notifying the permittee or owner of a public water system, sewerage system, or treatment works, and ensuring the agency and, if applicable, the local regulatory agency, is notified of items that require notification in accordance with sections 6109, or 6111, of the Revised Code, the rules adopted thereunder, or the facility's NPDES permit; and

(D) In the event that there are issues related to paragraphs (A) to (C) of this rule that are within the area of responsibility of, but beyond an operator of record or a certified operator's ability to address, it shall be the operator's responsibility to document any efforts to rectify the problem.

Effective: 12/21/2006

R.C. 119.032 review dates: 12/21/2011

Promulgated Under: 119.03

Statutory Authority: RC Sections 6111.46, 6109.04

Rule Amplifies: RC Sections 6111.46, 6109.04