



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

FILE COPY

April 21, 2011

Mr. Lin Hensley
Village Administrator
Village of Richwood
Department of Utilities
286 South Franklin Street
Richwood, OH 43344

**Re: NPDES 4PB00018 / OH0027260
Village of Richwood WWTP
Reconnaissance Inspection
Union County**

Dear Mr. Hensley:

On April 13, 2011, a Reconnaissance Inspection was conducted at the Village of Richwood Waste Water Treatment Plant (WWTP). Present for the inspection were you and John Grosse, representing the Village, and Kelly Thiel and myself of Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your effective National Pollutant Discharge Elimination System (NPDES) permit.

I appreciated the opportunity to meet you and to tour the facility. Overall, I was pleased with how the facility was operating. The following findings include observations and responses to what was discussed during the inspection.

Findings:

1. **Permit Violations:** The Richwood WWTP has had two permit effluent violations since April 2009 (see attached). Ohio EPA has received adequate responses to each violation.
2. **Inflow and Infiltration:** The plant is designed to treat an average daily flow of 0.38 MGD. The operating average daily flow since April 2009 is 0.26 MGD. There have been nine reported days where the flow rate was double the design rate. The peak flow rate was 2.25 MGD which was experienced on February 28, 2011. The plant turns off the blowers during high flow periods which reduces treatment efficiency but retains the solids. The inflow and infiltration (I&I) problem should be dealt with as soon as possible. **Please respond within 30 days with a proposed schedule of eliminating the I&I.**

Mr. Lin Hensley
Village Administrator
Village of Richwood
Department of Utilities
Page -2-

3. **Minimum Staffing Requirements:** The operator of record for a Class II WWTP (see **Finding 4** for classification discussion) is required to be present on-site five days a week for a minimum of 20 hours per week according to Ohio Administrative Code (OAC) rule 3745-7-04 (C)(1). The permit requires compliance with this rule once the permit is renewed which should be on August 1, 2013. Mr. Grosse, the Operator of Record, has the appropriate certification but would not be on-site enough to meet the staffing requirements. Village of Richwood employees are working to obtain a Class II WWTP Operator classification by the permit renewal. **Please notify this office when the appropriate certification is achieved.**

4. **WWTP Classification:** The Richwood WWTP is classified as Class III. After talking with Kelly Thiel, it was decided that Richwood WWTP should be reclassified as Class II according to OAC rule 3745-7-04(B)(2). However, Ohio EPA prefers to wait until the permit expires to reclassify the facility. The classification mainly effects the staffing requirements and because Richwood has until the permit expires to achieve appropriate operator classification, the delay in reclassification should not affect operations.

Attached is the Reconnaissance Inspection Report. There are no additional items which require a response.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or by e-mail at cole.miller@epa.ohio.gov.

Sincerely,



Cole Miller
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

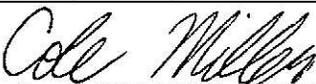
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4PB00018	OH0027260	4/13/11	R	S	1

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Richwood WWTP 302 Franklin St. Richwood, Ohio 43344	10:00 AM	August 1, 2008
	Exit Time	Permit Expiration Date
	10:40 AM	July 31, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Lin Hensley, Village Administrator John Grosse, Operator of Record	(740) 943-3315	
Name and Title of Responsible Official	Phone Number	
Lin Hensley, Village Administrator 286 South Franklin St. Richwood, Ohio 43344	(740) 943-3315	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
S	Records/Reports	
S	Operations & Maintenance	
S	Facility Site Review	
M	Collection System	I&I results in peak flows being six times higher than the design flow.
N	Flow Measurement	
S	Laboratory	
S	Effluent/Receiving Waters	
N	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Note: The plant operations appeared to be working well. The effluent looked clear and there were no observable solids at the outfall.

Signatures			
	4.21.11		4.18.11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

Richwood WWTP Effluent Violations 4/1/09 - 3/1/11					
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2010	Total Suspended Solids	7D Conc	18	20.5	8/22/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.08	6/1/2010

Richwood Peak Flow Rates between 4/09 -3/11					
Facility	Reporting Code	Parameter	Units	Date	Reported Value
Richwood WWTP	50050	Flow Rate	MGD	6/30/2010	229
Richwood WWTP	50050	Flow Rate	MGD	2/28/2011	2.25
Richwood WWTP	50050	Flow Rate	MGD	5/1/2009	1.726
Richwood WWTP	50050	Flow Rate	MGD	6/19/2009	1.312
Richwood WWTP	50050	Flow Rate	MGD	1/24/2010	0.947
Richwood WWTP	50050	Flow Rate	MGD	3/14/2010	0.885
Richwood WWTP	50050	Flow Rate	MGD	3/13/2010	0.859
Richwood WWTP	50050	Flow Rate	MGD	3/22/2010	0.776
Average Flow :	.264 MGD				