



State of Ohio Environmental Protection Agency

FILE COPY

STREET ADDRESS:

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MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

December 10, 2008

David Eades
City of London
P.O. Box 649
London, OH 43140

Re: 4PC00003/OH023779
London WWTP
Compliance Inspection
Pickaway County

Dear Mr. Eades:

Enclosed is the Compliance Inspection Report for the City of London wastewater treatment plant (WWTP). This inspection was conducted on December 5, 2008 by Ohio EPA personnel. The purpose of this inspection was to, evaluate the condition and operating capabilities of the WWTP, progress of the construction efforts, and correlate effluent quality with the water quality in the Deer Creek basin.

At the time of the inspection, the facility was found to be unacceptable. On or before January 15, 2009, please remove the valve and sewer pipe that allows the sludge drying bay to discharge into the stream. I will re-evaluate the wastewater treatment plant on January 16, 2009.

As discussed during the inspection, the City of London is currently evaluating the type of water treatment plant to construct. During this evaluation period, please consider that the backwash water from ion exchange water treatment plants have elevated amounts of total dissolved solids (TDS). Once the backwash enters the wastewater plant it "passes through" the plant into the receiving stream and causes a toxic environment. To correct for this problem the City would then have to install pretreatment equipment to lower the TDS in the effluent before discharging to the stream.

If you have any questions, comments or concerns, please call me at (614) 728-3847.

Sincerely,

Sheree Gossett-Johnson
Environmental Specialist II
Enforcement and Compliance
Division of Surface Water
Central District Office

Enclosures

c: Dan Leavitt

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

NPDES COMPLIANCE INSPECTION REPORT

Permit #	NPDES	Section A: National Data System Coding	Mo/Day/Yr	Insp. Type	Inspector	Watershed
4PC00003	OH023779		12/5/2008	C	S	Darby

Section B: Facility Data

Facility Name:	<u>City of London</u>	Entry Time	Permit Eff. Date
Address:	<u>P.O. Box 649</u>	10:00 a.m.	11/01/05
City/State/Zip:	<u>London, Ohio 43140</u>	Exit Time	Permit Exp. Date
		11:30 a.m.	07/31/09

On-Site Representatives

Name: Dan Leavitt
Title: Superintendent
Phone: (740) 852-0279 fax 740 852-7032

Responsible Official

Name/Title: Mr. Eades, Mayor
Address: P.O. Box 649, London, Ohio 43140
Phone: (614)879-8655

Section C: Areas Evaluated During Inspection:

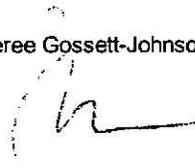
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not-Evaluated)

Permit	S	Effluent/ Receiving Waters	S
Records/Reports	S	Sludge Storage/ Disposal	U
Operations & Maint.	S	Pretreatment	---
Facility Site Review	S	Compliance Schedules	S
Collection System	S	Self-Monitoring Program	S
Flow Measurement	S	Other	
Laboratory	S		

Section D: Summary of Findings/Comments:

Name of Inspector: Sheree Gossett-Johnson

Ohio EPA, Central District Office

Signature: 

Date: Dec 8, 2008

Name of Reviewer: Erin Sherer

Ohio EPA, Central District Office

Signature: 

Date: 12/9/08

USEPA NPDES No.
Ohio NPDES No.

OH023779
4PC00003

Sections E thru K: Complete on all inspections as appropriate. (N/A - Not Applicable N/E - Not Evaluated)

Section E. Permit Verification

	Yes	No	N/A	N/E
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	X			
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	X			
(c) PRODUCT(S) AND PRODUCTION RATES CONFORM WITH PERMIT APPLICATION			X	
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT	X			
(e) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION	X			
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION		X		
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES			X	
(h) ALL DISCHARGES ARE PERMITTED	X			
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN THE PERMIT	X			

COMMENTS/STATUS:

Section F. Compliance Schedule and Violations

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE LAST INSPECTION		X		
(b) PERMITTEE IS TAKING ACTION TO RESOLVE VIOLATIONS		X		
(c) PERMITTEE HAS COMPLIANCE SCHEDULE		X		
(d) COMPLIANCE SCHEDULE CONTAINED :	X			
(e) PERMITTEE IS MEETING SCHEDULE OF COMPLIANCE	X			

COMMENTS/STATUS:

Section G. Operation and Maintenance

TREATMENT WORKS:
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

	Yes	No	N/A	N/E
(a) STANDBY POWER AVAILABLE: GENERATOR <u>X</u> DUAL FEED	X			
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	X			
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	X			
(d) SUFFICIENT STAFF PROVIDED #SHIF <u>40 hrs</u> DAYS/WK <u>1 week</u>	X			
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS PROVIDED BY PERMIT- CL/ <u>Class III</u>		X		
(f) ROUTINE AND PREVENTATIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME	X			
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION		X		
(h) O&M MANUAL PROVIDED AND MAINTAINED	X			
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION	X			
(j) REG. AGENCY NOTIFIED OF BYPASSES--on MORs 1-800 #			X	
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED	X			

COMMENTS/STATUS:

Dan L. has submitted part II of the Class IV certification to the certification board.

Section G. Operation & Maintenance (continued)

Yes No N/A N/E

COLLECTION SYSTEM:

- (a) PERCENT COMBINED SYSTEM: %
- (b) COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION CSO SSO X
- (c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs) X
- (d) CSO O&M PLAN PROVIDED AND IMPLEMENTED X
- (e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT X
- (f) PORTABLE PUMPS USED TO RELIEVE SYSTEM X
- (g) LIFT STATION ALARMS PROVIDED AND MAINTAINED X
- (h) ARE LIFT STATIONS EQUIPPED WITH PERMANENT STANDBY POWER X
- (i) ANY INFLOW/INFILTRATION PROBLEM, OR MAJOR REPAIRS TO THE COLLECTION SYSTEM (SEPARATE SEWER SYSTEM) X
- (j) ANY COMPLAINTS SINCE LAST INSPECTION OF BASEMENT FLOODING X
- (k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY X

COMMENT/STATUS:

Section H. Sludge Management

Yes No N/A N/E

- (a) SLUDGE MANAGEMENT PLAN (SMP) X
IF YES, DATE SUBMITTED:
APPROVAL #
- (b) SLUDGE MANAGEMENT PLAN CURRENT X
- (c) SLUDGE ADEQUATELY DISPOSED OF: METH: Land Applied X
- (d) IS SLUDGE INCINERATED X
IF YES, ASH IS DISPOSED AT:
- (e) IS SLUDGE DISPOSAL CONTRACTED X
IF YES, CONTRACTOR NAME:
- (f) HAS AMOUNT OF SLUDGE CHANGED SINCE LAST INSPECTION X
- (g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT *X
- (h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP X
- (i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW X
- (j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE X
- (k) IS SLUDGE ADEQUATELY PROCESSED (digestion, dewatering, pathogen control) X

COMMENTS/STATUS:

The sludge storage bay has a by-pass valve to the stream, this shall be removed by January 15, 2009.

Section I. Self Monitoring Program

Part 1. Flow Measurement

Yes No N/A N/E

- (a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED X
TYPE OF FLOW MEASURING: Magnetic Flow Meter
- (b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibratic 8-Nov) X
- (c) SECONDARY INST. PROPERLY OPERATED & MAINTAINED X
- (d) FLOW MEASURING EQUIP. ADEQUATE FOR EXPECTED RANGES OF FLOWS X
- (e) ACTUAL FLOW DISCHARGED IS MEASURED X
- (f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY:
DAILY X MONTHLY
WEEKLY OTHER

Section I. Self Monitoring Program (continued)

Part 2. Sampling

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED IN THE PERMIT	X			
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	X			
(c) PERMITTEE USES REQUIRED SAMPLING METHOD	X			
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE	X			
(i) SAMPLES REFRIGERATED DURING COMPOSITING	X			
(ii) PROPER PRESERVATION TECHNIQUES USED	X			
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3	X			
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS, INCLUDING ALL ORIGINAL STRIP CHART RECORDS (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
(f) ADEQUATE RECORDS MAINTAINED (e.g., sampling date, time, exact location, etc.)	X			

Part 3. Laboratory

	Yes	No	N/A	N/E
(a) EPA APP. ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)	X			
(b) IF ALTERNATE PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED			X	
(c) ANALYSIS PERFORMED MORE FREQUENTLY THAN REQUIRED BY THE PERMIT		X		
(d) IF (c) IS YES, ARE RESULTS RECORDED IN PERMITTEE'S SELF-MONITORING REPORT			X	
(e) COMMERCIAL LABORATORY USED	X			
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB: <u>Oil & Grease, Metals (Cadmium, Chromium, Hexavalent Chromium, Copper, Lead, Mercury,</u> <u>Nickel, Zinc, Amonia</u>				
(2) LAB NAME: <u>Ginosko</u>				
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED	X			
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	X			
(h) ADEQUATE RECORDS MAINTAINED	X			
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM DATE:	NA	Satisfactory		
	NA	Marginal		
	NA	Unsatisfactory		

COMMENTS/STATUS:

Section J. Effluent/Receiving Water Observations

OUTFALL NO.	OIL SHEEN	VISIBLE GREASE	VISIBLE TURBIDITY	FOAM	FLOATING SOLIDS	COLOR	OTHER
1	none	none	none	none	none	none	

Section K. Multimedia Observations

	Yes	No	N/A	N/E
(a) ARE THERE ANY INDICATIONS OF SLOPPY HOUSEKEEPING OR POOR MAINTENANCE IN WORK AND STORAGE AREAS OR LABORATORIES.		X		
(b) DO YOU NOTICE STAINING OR DISCOLORATION OF SOILS, PAVEMENT, OR FLOORS		X		
(c) DO YOU NOTICE DISTRESSED (UNHEALTHY, DISCOLORED, DEAD) VEGETATION		X		
(d) DO YOU SEE UNIDENTIFIED DARK SMOKE OR DUSTCLOUDS COMING FROM SOURCES OTHER THAN SMOKESTACKS		X		
(e) DO YOU NOTICE ANY UNUSUAL COLORS OR STRONG CHEMICAL SMELLS		X		
(f) DO YOU SEE ANY OPEN OR UNMARKED DRUMS, UNSECURED LIQUIDS, OR DAMAGED CONTAINMENT FACILITIES?		X		

IF ANY OF THE ABOVE ARE OBSERVED, ASK THE FOLLOWING QUESTIONS:

- (1) WHAT IS THE CAUSE OF THE CONDITION?
- (2) IS THE OBSERVED CONDITION OR SOURCE A WASTE PRODUCT?
- (3) WHERE IS THE SUSPECTED CONTAMINANT NORMALLY DISPOSED?
- (4) IS THIS DISPOSAL PERMITTED?
- (5) HOW LONG HAS THE CONDITION EXISTED AND WHEN DID IT BEGIN?

COMMENTS/STATUS:

