



State of Ohio Environmental Protection Agency

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Certified Mail #91 7108 2133 3932 4449 8195

Mayor and Board of Public Affairs
Village of Ashley
101 East High Street
P.O. Box 361
Ashley, OH 43003

**Re: Ashley Sewage Treatment Plant
NPDES Permit: 4PB00027**

Ladies and Gentlemen:

This letter serves as a cover letter to the Compliance Evaluation Inspection Report attached to this letter and as a **"Notice of Violation"** for the NPDES permit violations pertaining to the Ashley STP located at 5981 Steamtown Road and operating under NPDES permit 4PB00027.

Be advised that failure to comply with effluent limitations may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

There are several items in the Attachment section of the report which require a written response. Please respond in writing within 30 days of the receipt of this letter/report.

Should you have any questions, please call me at 614-728-3846.

Sincerely,

Larry Korecko
Environmental Specialist
Compliance and Enforcement
Division Surface Water
Central District Office

c: T.J. Howard, Operator of Record

LK/nsm Ashley STP CEI 3-24 and 6-9-09 cover letter

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

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
4PB00027	OH0054488	6-9-09	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ashley STP 5981 Steamtown Road Ashley, Ohio		8-1-06
	Exit Time	Permit Expiration Date
		7-31-11

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
T. J. Howard, Operator of Record (contract operator)	
Name, Address and Title of Responsible Official	Phone Number
John Davis, Mayor Village of Ashley, P.O. Box 361, Ashley, OH 43003	770-747-2889

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>S*</u> Compliance Schedules
<u>M*</u> Operations & Maintenance	<u>U*</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>M*</u> Facility Site Review	<u>S*</u> Sludge Storage/Disposal	<u> </u> Other
<u>M*</u> Collection System		

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

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

- ~ Please provide details on the Inflow/Infiltration (I/I) work done over 2007-2008 and money spent.
- ~ Contract operator feels that a significant source of inflow was found on May 1, 2009 regarding a manhole near the old water plant. Please provide pictures of the area around this manhole and estimate potential that it was flooded in the past.
- ~ Does Village feel that enough rain events have occurred since I/I work completed that it can size an Equalization basin by the August 1, 2009 "Compliance Schedule" report deadline?
- ~ Bypass has been plugged per "Compliance Schedule". Please indicate when this was done.
- ~ How successful does Village feel it can reactivate the tertiary filters and give an estimated date if this can be done.
- ~ Answer questions in Attachment regarding reed sludge beds.

Larry Korecko
Larry Korecko, Inspector, Ohio EPA, Central District Office

6-30-09
Date

Erin Sherer
Erin Sherer, Reviewer, Ohio EPA, Central District Office

6-30-09
Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
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 (industries)			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	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 permit	X			

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X*			
b. Permittee is taking actions to resolve violations	X*			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in NPDES permit				
e. Permittee is meeting compliance schedule	X*			

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed _____				
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units		X*		
d. Sufficient operating staff provided: # of shifts _____ Days/Week _____	X*			
e. Operator holds unexpired license of class required by permit Class: <u>2</u>	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection	X*			
j. Regulatory agency notified of bypasses _____ on MORS <u>X</u> 800 Number _____	X			
k. Any hydraulic and/or organic overloads experienced since last inspection	X*			

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance				Yes	No	N/A	N/E
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 U.S. EPA quality assurance performance sampling program: _____ N/A Satisfactory _____ Marginal _____ Unsatisfactory							

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
-001	no	no	no	no	no	clear	

Comments:

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there 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		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
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:

ATTACHMENT

The Ashley sewage treatment plant (STP) consists of modified mechanical screens, Orbal oxidation ditch, two final clarifiers, rapid sand filtration (not operable), ultraviolet disinfection, and post aeration. Sludge is treated in aerobic digestors and sent to reed filter beds.

Operation and Maintenance

The overflow at the head of the plant was plugged as required in the NPDES permit (ahead of schedule!). Please **provide the date when this was done.**

Some work was also done in the screenings room. Please **explain** what was done and if any work remains to complete this project.

The tertiary treatment system seems to need a lot of work based on the monies requested in the "stimulus package application". What can the Village realistically do with this system if it doesn't receive "stimulus money"? Can it at least be made manually operable? Another alternative would be to investigate the construction of a third clarifier. This could enable different treatment scenarios during dry and wet weather. **Please comment in writing.**

There is a lot of work that is needed to regularly run the sewage treatment plant. On top of this, to do repair work on the tertiary system and influent screens there seems to be need for more manpower or to hire out some of this work.

Collection System

The Village obtained a great deal of money through grants and loans to perform work on the collection system to remove inflow/infiltration (I/I). Work on removal of I/I was done in 2007 and 2008 ending up around November 2008. **Please provide in detail exactly what I/I work was done.**

Additionally on May 1, 2009 contract operator stated that a large source of inflow was observed when a sanitary manhole near the old water plant was submerged in ponding water and water was rushing into the manhole. This situation was corrected but under certain circumstances may have in the past allowed large amounts of water into the collection system. There have been a few significant rain events since the I/I work has been completed. However, does the Village feel there have been enough rain events to size an equalization basin? A "Compliance Schedule" report is due August 1, 2009. The Village can attempt to size an equalization basin now or request through a permit modification application that an additional 12 months be given to size the equalization basin and submit a Permit to Install application for the EQ basin. It should also request at least three months to construct the EQ basin (as in the current permit). **Please respond in writing.**

Graphs of effluent flows for the past few years are provided for your information. You should also look at your circular flow charts which show how flows increase over time during a rain event. This can be a good indication of I/I and also point out how successful your efforts have been to remove I/I from the collection system.

Sludge

It appears that the sludge beds have been exclusively to get rid of sludge for the last two years. However, the "stimulus money application" stated that reed beds need to be cleaned out and restored. **Can the reed beds go another year without this work?**

In the past, the plant operator used a digestion tank to lime stabilize the sludge (raise the pH to over 12 for the required period of time) and then land applied the sludge. If this method is needed to be used **be sure to follow all of Ohio EPA's sludge rules as far as sampling the sludge, land applying it, and keeping adequate records for each field used.**

Effluent and Permit violations

Review in SWIMS of monthly self-monitoring discharge reports for the Ashley sewage treatment plant for the period December 2007 through May 2009 are attached to this report. Hopefully you have removed sufficient I/I that treatment will be better and violations far less frequent.

Ohio EPA sampled the Ashley Sewage Treatment Plant effluent on March 24, 2009. Contract operator also sampled that same day. Results are on an attached table. The results showed the plant to be in compliance with permit limitations.

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ASHLEY STP

Get New Data

VIOLATIONS DECEMBER 2007 THROUGH MAY 2009

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00027*HD	December 2007	001	00530	Total Suspended Solids	7D Conc	18	19.5	12/8/2007
4PB00027*HD	December 2007	001	00530	Total Suspended Solids	7D Qty	12.9	15.4764	12/8/2007
4PB00027*HD	February 2008	001	00530	Total Suspended Solids	7D Qty	12.9	15.6920	2/1/2008
4PB00027*HD	February 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	3.24	3.94016	2/1/2008
4PB00027*HD	March 2008	001	00530	Total Suspended Solids	30D Conc	12	17.875	3/1/2008
4PB00027*HD	March 2008	001	00530	Total Suspended Solids	7D Conc	18	53.	3/1/2008
4PB00027*HD	March 2008	001	00530	Total Suspended Solids	30D Qty	8.6	25.5405	3/1/2008
4PB00027*HD	March 2008	001	00530	Total Suspended Solids	7D Qty	12.9	80.1712	3/1/2008
4PB00027*HD	March 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.11	3/1/2008
4PB00027*HD	March 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	2.16	4.58725	3/1/2008
4PB00027*HD	March 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	3.24	6.38272	3/1/2008
4PB00027*HD	March 2008	001	80082	CBOD 5 day	30D Conc	10	10.9637	3/1/2008
4PB00027*HD	March 2008	001	80082	CBOD 5 day	7D Conc	15	30.	3/1/2008
4PB00027*HD	March 2008	001	80082	CBOD 5 day	30D Qty	7.2	15.2777	3/1/2008
4PB00027*HD	March 2008	001	80082	CBOD 5 day	7D Qty	10.8	45.1531	3/1/2008
4PB00027*HD	March 2008	001	00530	Total Suspended Solids	7D Qty	12.9	20.4692	3/15/2008
4PB00027*HD	March 2008	001	80082	CBOD 5 day	7D Qty	10.8	13.9350	3/15/2008
4PB00027*HD	May 2008	001	00530	Total Suspended Solids	30D Conc	12	12.375	5/1/2008
4PB00027*HD	May 2008	001	00530	Total Suspended Solids	7D Conc	18	37.5	5/8/2008
4PB00027*HD	May 2008	001	00530	Total Suspended Solids	7D Qty	12.9	26.6208	5/8/2008
4PB00027*HD	May 2008	001	31616	Fecal Coliform	7D Conc	2000	7000.	5/8/2008
4PB00027*HD	May 2008	001	80082	CBOD 5 day	7D Conc	15	18.015	5/8/2008
4PB00027*HD	May 2008	001	80082	CBOD 5 day	7D Qty	10.8	15.1989	5/8/2008
4PB00027*HD	June 2008	001	00530	Total Suspended Solids	7D Qty	12.9	16.0872	6/1/2008
4PB00027*HD	June 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.04	6/1/2008
4PB00027*HD	June 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	1.44	3.31159	6/1/2008
4PB00027*HD	June 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	2.16	6.52068	6/1/2008
4PB00027*HD	June 2008	001	31616	Fecal Coliform	7D Conc	2000	2180.	6/1/2008
4PB00027*HD	June 2008	001	80082	CBOD 5 day	7D Qty	10.8	14.7346	6/1/2008
4PB00027*HD	July 2008	001	31616	Fecal Coliform	30D Conc	1000	1080.06	7/1/2008
4PB00027*HD	July 2008	001	31616	Fecal Coliform	7D Conc	2000	7000.	7/1/2008
4PB00027*HD	July 2008	001	80082	CBOD 5 day	7D Conc	15	22.08	7/15/2008
4PB00027*HD	July 2008	001	00530	Total Suspended Solids	7D Conc	18	33.	7/22/2008

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4PB00027*HD	July 2008	001	00530	Total Suspended Solids	7D Qty	12.9	14.0968	7/22/2008
4PB00027*HD	July 2008	001	31616	Fecal Coliform	7D Conc	2000	2400.	7/22/2008
4PB00027*HD	February 2009	001	00530	Total Suspended Solids	30D Conc	12	44.875	2/1/2009
4PB00027*HD	February 2009	001	00530	Total Suspended Solids	30D Qty	8.6	73.5628	2/1/2009
4PB00027*HD	February 2009	001	80082	CBOD 5 day	30D Qty	7.2	15.0208	2/1/2009
4PB00027*HD	February 2009	001	00530	Total Suspended Solids	7D Conc	18	164.	2/8/2009
4PB00027*HD	February 2009	001	00530	Total Suspended Solids	7D Qty	12.9	285.187	2/8/2009
4PB00027*HD	February 2009	001	80082	CBOD 5 day	7D Conc	15	32.35	2/8/2009
4PB00027*HD	February 2009	001	80082	CBOD 5 day	7D Qty	10.8	56.2503	2/8/2009
4PB00027*HD	March 2009	001	00530	Total Suspended Solids	7D Qty	12.9	13.7518	3/8/2009
4PB00027*HD	April 2009	001	00530	Total Suspended Solids	30D Conc	12	16.1142	4/1/2009
4PB00027*HD	April 2009	001	00530	Total Suspended Solids	30D Qty	8.6	11.0154	4/1/2009
4PB00027*HD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.39	4/1/2009
4PB00027*HD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	2.16	3.6502	4/1/2009
4PB00027*HD	April 2009	001	00530	Total Suspended Solids	7D Conc	18	26.	4/8/2009
4PB00027*HD	April 2009	001	00530	Total Suspended Solids	7D Qty	12.9	15.3012	4/8/2009
4PB00027*HD	April 2009	001	00530	Total Suspended Solids	7D Conc	18	20.	4/15/2009
4PB00027*HD	April 2009	001	00530	Total Suspended Solids	7D Qty	12.9	18.4480	4/15/2009
4PB00027*HD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	8.34	4/15/2009
4PB00027*HD	April 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	3.24	7.16884	4/15/2009
4PB00027*HD	May 2009	001	31616	Fecal Coliform	7D Conc	2000	7000.	5/1/2009
4PB00027*HD	May 2009	001	00530	Total Suspended Solids	7D Conc	18	25.5	5/8/2009

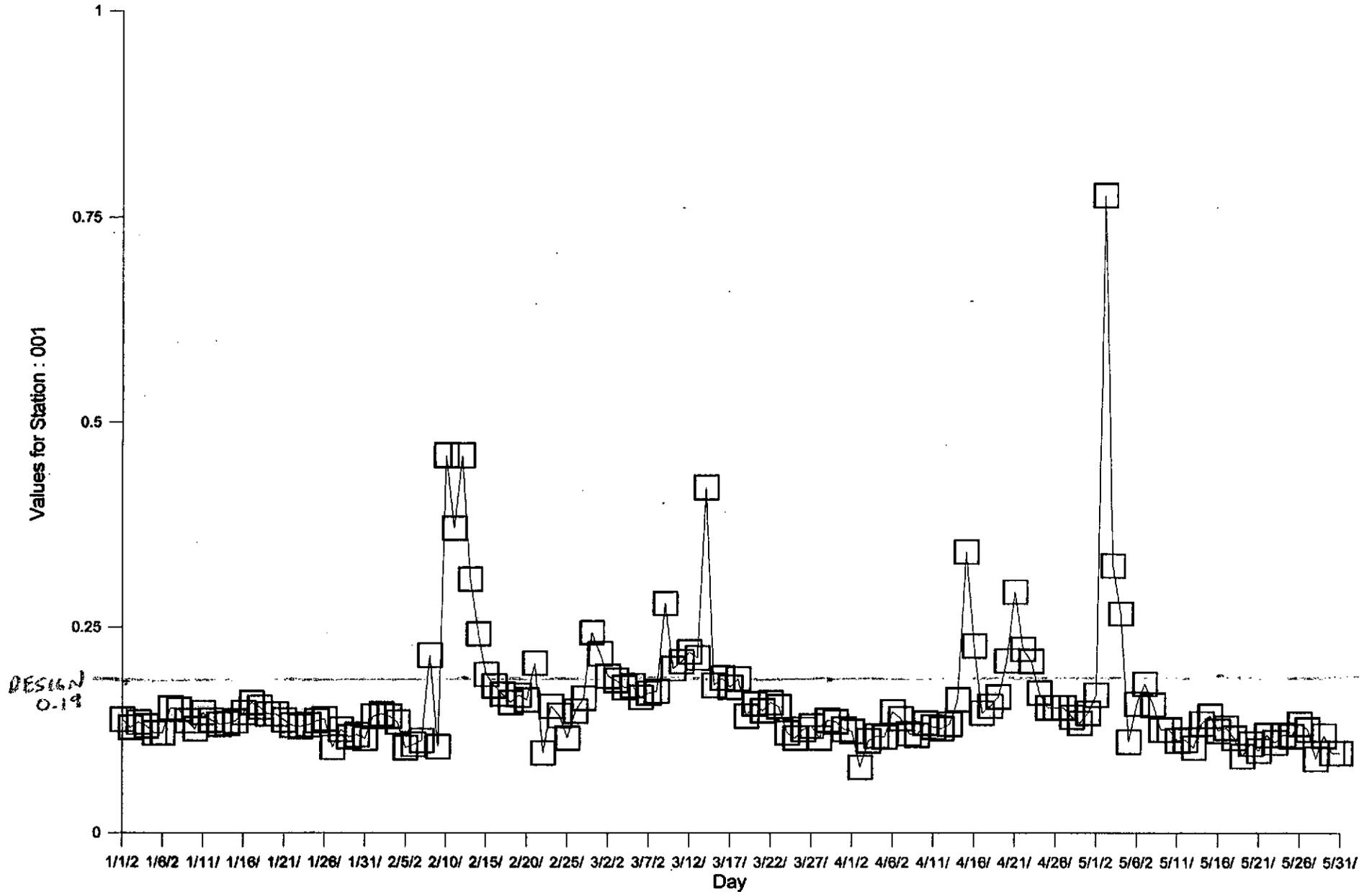
Table 1

Ashley Sewage Treatment Plant
Final Effluent
March 24, 2009

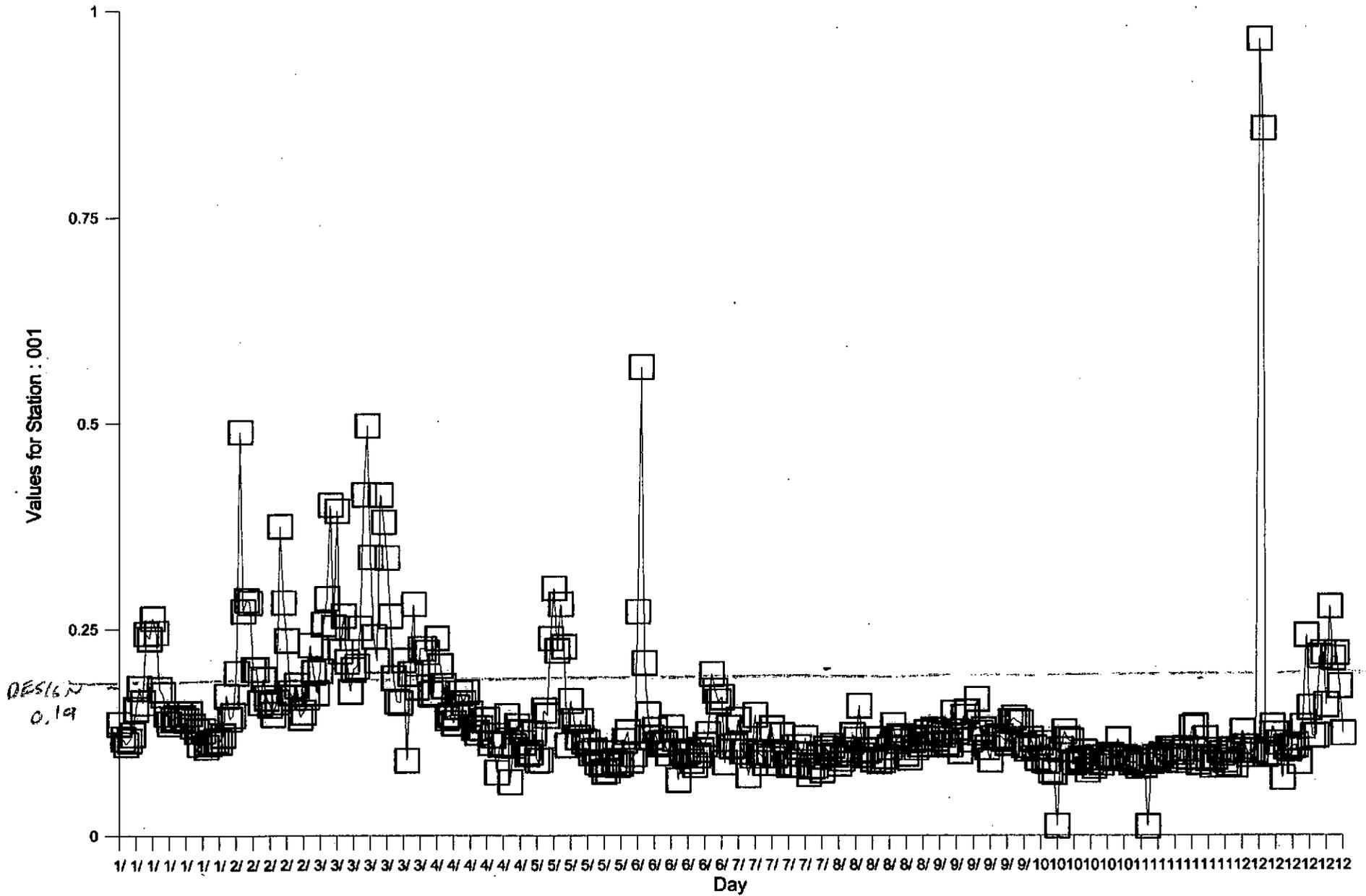
PARAMETER	Ohio EPA Lab	TCCI Lab	30 day Limit	7 day Limit
CBOD5 (mg/l)	2	3.5	10	15
Suspended Solids (mg/l)	5	6	12	18
Ammonia (mg/l)	0.16	-	3	4.5

Flow for the day was 0.12 MGD and design flow is 0.19 MGD

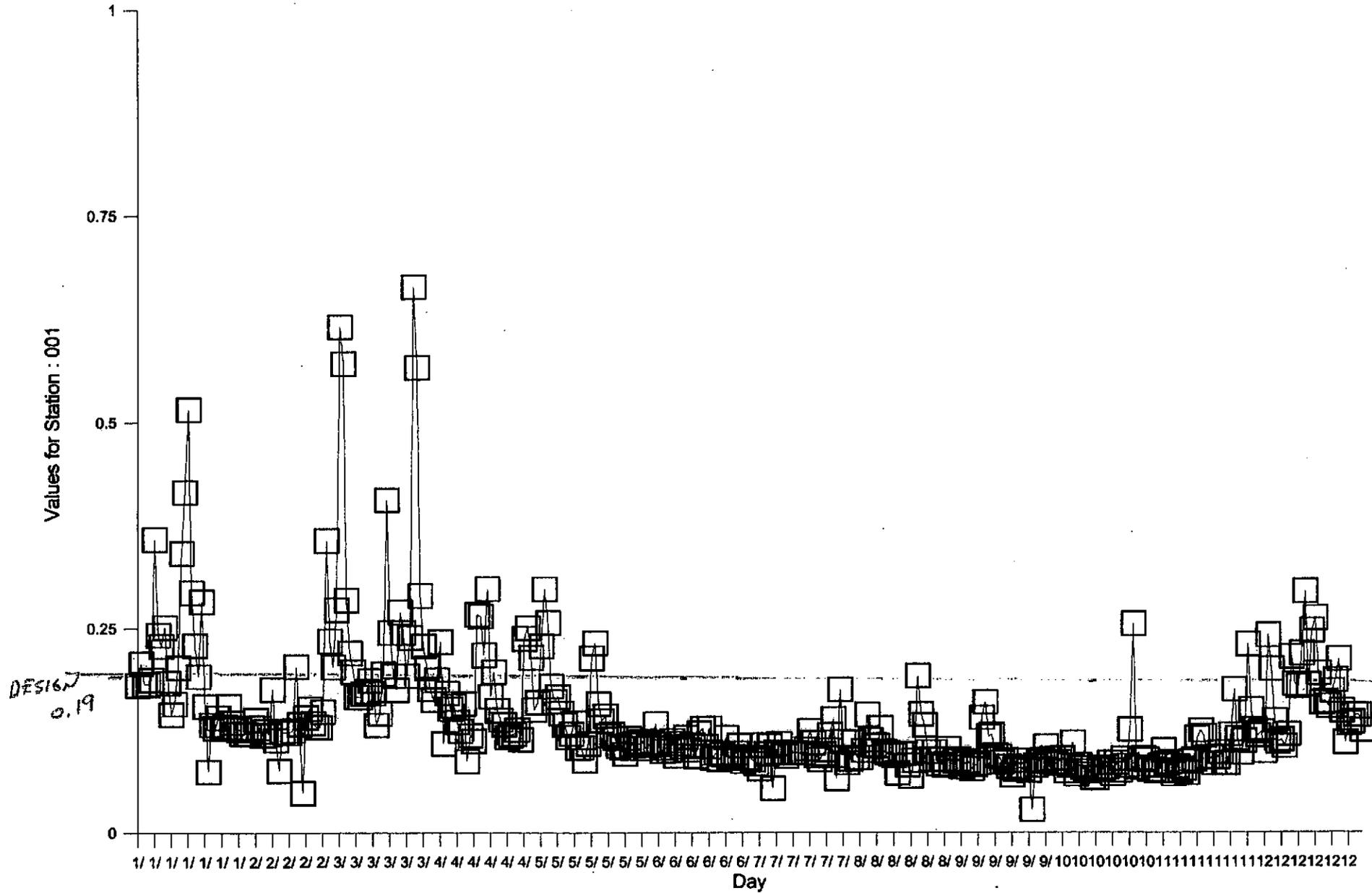
Ashley WWTP 4PB00027*HD :
Period : 01/01/2009 to 05/31/2009 Parameter : Flow Rate (MGD)



Ashley WWTP 4PB00027*HD :
Period : 01/01/2008 to 12/31/2008 Parameter : Flow Rate (MGD)



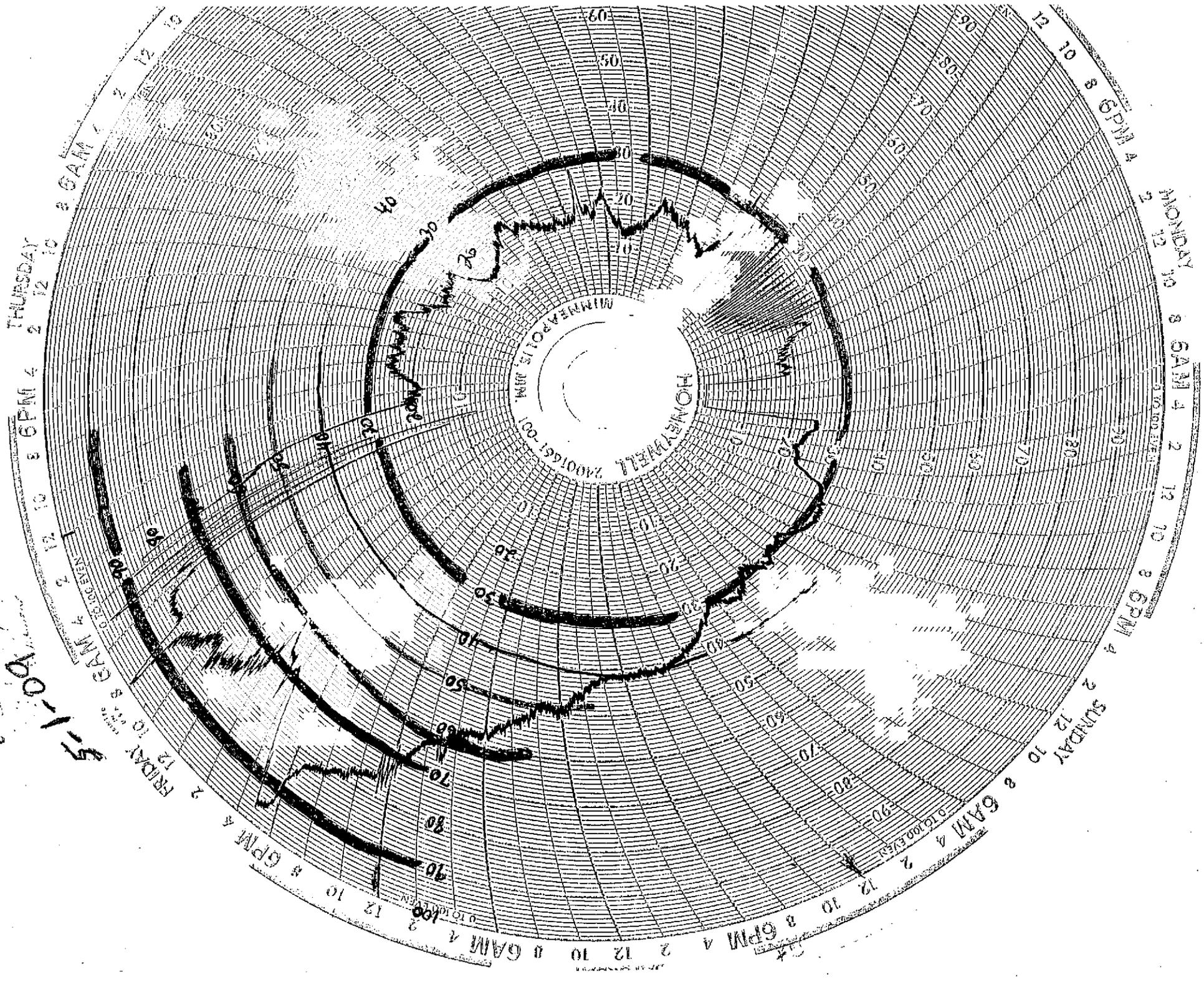
Ashley WWTP 4PB00027*HD :
Period : 01/01/2007 to 12/31/2007 Parameter : Flow Rate (MGD)



ASHLEY

fresh water mixing into water

5-1-00



ASHLEY STP
Final Effluent
March 24, 2009

PARAMETER	Ohio EPA Lab	TCCI Lab	30 day Limit	7 day Limit
CBOD5 (mg/l)	2	3.5	10	15
Suspended Solids (mg/l)	5	6	12	18
Ammonia (mg/l)	0.16	-	3	4.5

Flow for the day was 0.12 MGD and design flow is 0.19 MGD