



FILE COPY

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

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

July 25, 2008

Spencer Sheldon, Superintendent
Del-Co Water Company Inc.
6682 Olentangy River Road
Delaware, OH 43015

Re: 4IW01003/OH0124222
Del-Co Water Company Inc.
East Knox Thomas Steward WTP
Reconnaissance Inspection
Knox County

Dear Mr. Sheldon:

Enclosed is the Reconnaissance Inspection Report for the Del-Co Water Co. Inc. East Knox Thomas E. Steward water treatment plant. This inspection was conducted on July 15, 2008 by Ohio EPA personnel as part of the NPDES permit renewal process.

At the time of the inspection, the facility was found to be acceptable.

After review of your monthly operating reports, it appeared that on April 1 and 21, 2008, effluent limitation violations for total suspended solids occurred. A list of the violations is attached. Please inform this office, in writing, within twenty days of receipt of this letter as to the reason for the violations, as well as a description of the action taken to prevent any further violations.

In addition, please review the draft permit when it is issued. Parameters will be added to bring the permit into compliance with the current rules for water treatment plants.

If you have any questions, comments, or concerns, please call me at (614)728-3853.

Sincerely,

Suzanne Matz
Environmental Specialist II
Division of Surface Water
Central District Office

Enclosure

SMWsm Del-Co WTP 7-15-08

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



NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Mo/Day/Year	Insp. Type	Inspector	Fac Type
4IW01003	OH0124222	7/15/2008	R	S	P

Watershed: Kokosing

Section B: Facility Data

Facility Name: <u>Del-Co Water Company Inc. East Knox Plant</u>	Entry Time	Permit Eff. Date
Address: <u>14821 Lucerne Road</u>	12:30 PM	12/1/2003
City/State/Zip: <u>Fredericktown. OH 43019</u>	Exit Time	Permit Exp. Date
	2:30 PM	11/30/2008

On-Site Representatives Contract Operator-

Name: Spencer Sheldon
 Title: Plant Superintendent
 Phone: (740) 548-7746

Responsible Official

Name/Title: P.K. Tudor
 Address: General Manager
 Phone: (740) 548-7746

Section C: Areas Evaluated During Inspection:

(S=Satisfactory, U=Unsatisfactory, N=Not-Evaluated, M=Conditionally Acceptable, N/A=Not Applicable)

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

Section D: Summary of Findings/Comments:

Please review the draft permit when it is issued. Parameters will be added to bring the permit into compliance with the current rules for water treatment plants. In addition, please review the attached list of violations and respond to this office, in writing, within 20 days of receipt of this letter.

Name of Inspector: Suzanne Matz Ohio EPA, Central District Office

Signature: *Suzanne Matz* Date: 7-22-08

Name of Reviewer: Erin Sherer Ohio EPA, Central District Office

Signature: *Erin Sherer* Date: 7-24-08

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 (Industrial)	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 THE PERMIT	X			
COMMENTS/STATUS: See attached violation list.				

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 IN:			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 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 #SHIFTS: 1 DAYS/WK: 7	X			
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS PROVIDED BY PERMIT- CLASS:			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 SINCE LAST INSPECTION		X		
COMMENTS/STATUS:				

Section G. Operation & Maintenance (continued)

			Yes	No	N/A	N/E
COLLECTION SYSTEM:						
(a) PERCENT COMBINED SYSTEM:					X	
(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 OR EQUIV.					X	
(i) ANY INFLOW/INFILTRATION PROBLEM, OR ANY MAJOR REPAIRS TO THE COLLECTION SYSTEM SINCE LAST INSPECTION (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:			X	
	APPROVAL #			X	
(b) SLUDGE MANAGEMENT PLAN CURRENT				X	
(c) SLUDGE ADEQUATELY DISPOSED OF: METHOD- Land application		X			
(d) IS SLUDGE INCINERATED				X	
	IF YES, ASH IS DISPOSED AT:			X	
(e) IS SLUDGE DISPOSAL CONTRACTED		X			
	IF YES, CONTRACTOR NAME: <u>Cooperrider Farms</u>	X			
(f) HAS AMOUNT OF SLUDGE CHANGED SIGNIFICANTLY 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:

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: <u>Ultrasonic meter with Parshall Flume</u>	X			
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration):		X			
(c) SECONDARY INST. (totalizer, recorder, etc.) 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 _____ MONTHLY _____				
	WEEKLY _____ OTHER <u>X</u>				

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) PERMITTEE USES REQUIRED SAMPLING METHOD	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE				
(i) SAMPLES REFRIGERATED DURING COMPOSITING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) PROPER PRESERVATION TECHNIQUES USED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) ADEQUATE RECORDS MAINTAINED (e.g., sampling date, time, exact location, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Part 3. Laboratory

	Yes	No	N/A	N/E
(a) EPA APP. ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) IF ALTERNATE PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) ANALYSIS PERFORMED MORE FREQUENTLY THAN REQUIRED BY THE PERMIT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) IF (c) IS YES, ARE RESULTS RECORDED IN PERMITTEE'S SELF-MONITORING REPORT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) COMMERCIAL LABORATORY USED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB: Nitrogen, Ammonia N; COD; Total THM; Fluoride, F, Dissolved; Carbon, Total Organic TOC; Residue Suspended (nonfilterable); Nitrogen, Nitrate as N; pH; BOD, 5 day				
(2) LAB NAME: <u>Alloway - Marion, OH</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(h) ADEQUATE RECORDS MAINTAINED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM DATE:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				Satisfactory
				Marginal
				Unsatisfactory
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Not Applicable

COMMENTS/STATUS:

Del-Co Water, Inc. East Knox Plant

Compliance History

1/1/07 – 6/30/08

Violation Date	Parameter	Limit Type	Limit	Reported Value
4/21/2008	Total Suspended Solids	1D Conc	45	115
4/1/2008	Total Suspended Solids	30D Conc	30	115

1. 5. 2. 1.

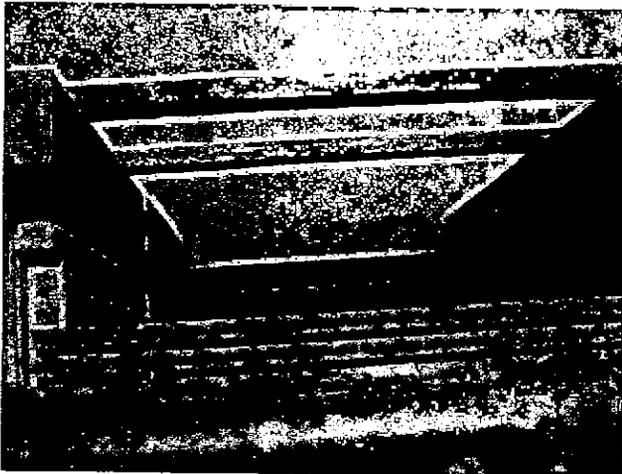
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Del-Co East Knox Thomas Steward Plant 7-15-08



Del-Co Lime Sludge Lagoon 7-15-08



Del-Co Lime Sludge Lagoon Release Point 7-15-08



Del-Co Outfall to unnamed tributary of Kokosing River 7-15-08



Del-Co Unnamed tributary of Kokosing River 7-15-08