



State of Ohio Environmental Protection Agency

FILE COPY

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

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

November 24, 2009

Mr. Robert White
Sakas Inc.
312 Baltimore-Somerset Road NE
Baltimore, OH 43015-0098

Dear Mr. White:

Attached to this letter is a report for a Reconnaissance Inspection that I performed October 22, 2009, at the wastewater treatment plant (WWTP) serving your facility. During the inspection you and I spoke about the disinfection technique currently in use which involves tablet chlorination in the sand filter dosing pump tank prior to the slow sand filter.

I reviewed 1/1/07 through 10/31/09 discharge monitoring report data which showed numerous effluent limitations violations. Many of the violations were for fecal coliform and chlorine residual. Attachment "A" in this report lists the effluent violations. Continued violations are unacceptable.

With this in mind, the disinfection system at this WWTP must be improved and relocated to a point downstream from the sand filters. You must prepare and submit engineering plans and a Permit to Install (PTI) Application to this office for installation of upgraded disinfection as soon as possible. You are not restricted solely to installation of chlorination/dechlorination as is indicated in your wastewater discharge permit compliance schedule.

Review of discharge monitoring reports for monitoring station 002 (noncontact cooling water) indicates that reporting has not occurred since 8/26/07 for the parameters pH and flow but reporting has continued for the temperature parameter. Please advise this office in writing by December 14, 2009 regarding the reason for this discrepancy.

If you have questions regarding this report I can be contacted by telephone at 614-728-3850 or by e-mail at jan.rice@epa.state.oh.us.

Sincerely,

Jan Rice
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

JR/nsm SAKA 10-22-09 Rlcovltr

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

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
4IC00015*CD	OH0081361	10/22/09	R	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Sakas Inc. Wastewater Treatment Plant (WWTP) 312 Baltimore-Somerset Road NE Baltimore, Ohio 43015-0098	12:00 P.M.	8/1/05
	Exit Time	Permit Expiration Date
	12:30 P.M.	7/31/10

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Robert White, V.P. Manufacturing	740-862-4114
Name(s) Address and Title(s) of Operator of Record	Phone Number(s)
Name, Address and Title of Responsible Official	Phone Number
Robert White, V.P. Manufacturing, P.O. Box 98 Baltimore, Ohio 43105	740-862-4114

C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>S</u>	Permit
<u>N/M</u>	Records/Reports - for monitoring station 002, noncontact cooling water reporting has not occurred since 8/26/07 for the parameters pH and flow but reporting has continued for the temperature parameter. The permittee must advise this office in writing by December 14, 2009 regarding the reason for this discrepancy.
<u>N</u>	Operations & Maintenance
<u>M</u>	Facility Site Review - disinfection location and technique have been inadequate to provide consistent compliance with permit fecal coliform and chlorine residual limitations.
<u>N</u>	Collection System
<u>N</u>	Flow Measurement
<u>N</u>	Laboratory
<u>U/N</u>	Effluent/Receiving Waters - Attachment "A" lists effluent limitation violations. Continued violations are unacceptable.
<u>N</u>	Sludge Storage/Disposal
<u>N</u>	Pretreatment
<u>U</u>	Compliance Schedules - consistent compliance with fecal coliform and chlorine residual limitations has not been demonstrated therefore disinfection upgrades are necessary. The permittee is not restricted solely to installation of chlorination/dechlorination as is indicated in the permit compliance schedule.
<u>N</u>	Self-Monitoring Program
<u>N</u>	Other

D. SUMMARY OF FINDINGS/COMMENTS

The wastewater discharge permit application for this facility indicates that this small extended aeration WWTP receives wastewater only from the facility restrooms. Facility operation is currently limited to three days per week. Wastewater discharged from the WWTP is monitored and sampled prior to discharge to a subsurface drainage tile. Noncontact cooling water from the facility is not routed into the WWTP but is monitored and sampled prior to discharge into a subsurface drainage tile.

Wastewater disinfection in this WWTP currently occurs in the dosing tank prior to the slow sand filters. This practice is not in accordance with guidance contained in the Ohio EPA Greenbook which Ohio EPA uses for WWTP design. The Greenbook can be viewed at <http://www.epa.state.oh.us/portals/35/documents/greenbook.pdf>. Page 23, Design Data - Chlorination, Item D) reads that chlorination should generally be introduced prior to lagoons and following tertiary sand filters.

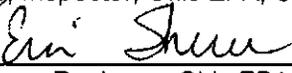
Review of effluent limitation violations contained in Attachment "A" of this report show that this WWTP has been unable to provide consistent compliance with fecal coliform and chlorine residual limitations. With this in mind the disinfection system at this WWTP must be improved and relocated to a point downstream from the sand filters. The permittee must prepare and submit engineering plans and a Permit to Install (PTI) Application to this office for installation of upgraded disinfection as soon as possible.

The PTI application forms can be viewed at this website: <http://www.epa.state.oh.us/dsw/pti/PTIForms.aspx>. Forms that must be submitted include Form A, Form B4-6 and the Antidegradation Addendum. Please include processing fees as required in Form A. If you have questions regarding forms completion you may have your professional engineer contact Kelly Thiel in this office by e-mail at kelly.thiel@epa.state.oh.us or by telephone at 614-728-3856.

The current wastewater discharge permit does not require that the WWTP be overseen by a certified wastewater operator. This will change when the permit is next renewed. The Ohio Administrative Code Section 3745-7 effective December 21, 2006 requires that an extended aeration WWTP be overseen by an appropriately certified individual. Based on the permit design flow of 600 gallons per day and information available in OAC 3745-7-04 (B)(2)(b), this WWTP is classified Class A. The permit, when renewed, will require that the WWTP be overseen by an individual having at least a Class A wastewater certification. A list of certified operators can be viewed at this website: http://www.epa.state.oh.us/portals/28/documents/opcert/contract_operator_list.pdf. Additional certification information can be viewed at: <http://www.epa.state.oh.us/ddagw/opcert.aspx>.



Jan Rice, Inspector, Ohio EPA, Central District Office



Erin Sherer, Reviewer, Ohio EPA, Central District Office

11/23/09

Date

11/30/09

Date

Attachment "A"
 Sakas Inc.
 Effluent Limitation Violations
 1/1/7 - 10/31/09

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4IC00015*CD	June 2007	001	31616	Fecal Coliform	30D Conc	1000	1000.	6/1/2007
4IC00015*CD	August 2007	001	31616	Fecal Coliform	30D Conc	1000	4200.	8/1/2007
4IC00015*CD	August 2007	001	31616	Fecal Coliform	7D Conc	2000	4200.	8/1/2007
4IC00015*CD	August 2007	001	50060	Chlorine, Total Residue	1D Conc	0.019	.13	8/1/2007
4IC00015*CD	August 2007	001	50060	Chlorine, Total Residue	1D Conc	0.019	.06	8/8/2007
4IC00015*CD	December 2007	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	6.8	11.	12/1/2007
4IC00015*CD	December 2007	001	80082	CBOD 5 day	30D Conc	10	12.	12/1/2007
4IC00015*CD	December 2007	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.2	11.	12/8/2007
4IC00015*CD	June 2008	001	31616	Fecal Coliform	30D Conc	1000	4134.	6/1/2008
4IC00015*CD	June 2008	001	31616	Fecal Coliform	7D Conc	2000	4134.	6/15/2008
4IC00015*CD	June 2008	001	50060	Chlorine, Total Residue	1D Conc	0.019	.42	6/18/2008
4IC00015*CD	August 2008	001	31616	Fecal Coliform	30D Conc	1000	1000.	8/1/2008
4IC00015*CD	March 2009	001	00530	Total Suspended Solids	30D Conc	12	48.	3/1/2009
4IC00015*CD	March 2009	001	00530	Total Suspended Solids	7D Conc	18	48.	3/1/2009
4IC00015*CD	March 2009	001	00530	Total Suspended Solids	30D Qty	0.027	.04179	3/1/2009
4IC00015*CD	March 2009	001	00530	Total Suspended Solids	7D Qty	0.041	.04179	3/1/2009
4IC00015*CD	June 2009	001	00530	Total Suspended Solids	30D Conc	12	18.	6/1/2009
4IC00015*CD	August 2009	001	31616	Fecal Coliform	30D Conc	1000	1333.	8/1/2009

Attachment "A"
 Sakas Inc.
 Monitoring Frequency Violations
 1/1/7 - 10/31/09

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/02/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/03/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/04/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/05/2007
4IC00015*CD	February 2007	001	01330	Odor, Severity	1/Week	1	0	02/08/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/08/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/09/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/10/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/11/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/12/2007
4IC00015*CD	February 2007	001	01330	Odor, Severity	1/Week	1	0	02/15/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/15/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/16/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/17/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/18/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/19/2007
4IC00015*CD	February 2007	001	01330	Odor, Severity	1/Week	1	0	02/22/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/22/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/23/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/24/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/25/2007
4IC00015*CD	February 2007	001	00056	Flow Rate	1/Day	1	0	02/26/2007
4IC00015*CD	August 2008	001	00056	Flow Rate	1/Day	1	0	08/22/2008