



Environmental Protection Agency

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

FILE COPY

February 8, 2011

Ms. Patricia Byers
President
Walnut Creek Sewer District
102 East Columbus Street
P.O. Box 599
Pleasantville, OH 43138

Dear Ms. Byers:

Attached is a report for a Compliance Evaluation Inspection Report that I performed January 6, 2011, at the Walnut Creek Sewer District wastewater treatment plant (WWTP). It was good speaking with you and seeing progress that the district has made to improve both its WWTP and sanitary sewer collection system. The improvements will benefit the district and stream water quality for many years into the future.

Please review the report and let me know if you have questions. I can be reached by telephone at 614-728-3850 or by e-mail at jan.rice@epa.ohio.gov.

Sincerely,

Jan A. Rice
Environmental Specialist
Enforcement/Compliance Group
Division of Surface Water
Central District Office

c: John Kinder, Kinder Environmental Services, Inc.

JAR/nsm Walnut Creek SD 1-6-11 CEIcavltr



NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. 4PA00005*GD	NPDES No. OH0054917	Month/Day/Year 1/6/11	Inspection Type CEI	Inspector S	Facility Type 2
----------------------------------	-------------------------------	---------------------------------	-------------------------------	-----------------------	---------------------------

B. FACILITY DATA

Name and Location of Facility Inspected Walnut Creek Sewer District Wastewater Treatment Plant (WWTP) 1700 Leitnaker Road Pleasantville, Ohio 43138	Entry Time 9:00 A.M.	Permit Effective Date 8/1/08
	Exit Time 11:45 A.M.	Permit Expiration Date 7/31/13

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Ms. Patricia Byers, President, Walnut Creek Sewer District Matt Ardrey, Operator, Kinder Environmental Services, Inc. John Kinder, President, Kinder Environmental Services, Inc. Val Jackson, Engineer, Kinder Environmental Services, Inc.	740-468-3409 740-522-0762 740-522-0762 740-522-0762
Name(s) Address and Title(s) of Operator of Record	Phone Number(s)
Matt Ardrey, Operator of Record, Kinder Environmental Services, Inc., 2112 Cherry Valley Road, Newark, Ohio 43055 John Kinder, Operator of Record, Kinder Environmental Services, Inc., 2112 Cherry Valley Road, Newark, Ohio 43055	740-522-0762 740-522-0762
Name, Address and Title of Responsible Official	Phone Number
Ms. Patricia Byers, President, Walnut Creek Sewer District 102 East Columbus Street, P.O. Box 599, Pleasantville, Ohio 43138	740-468-3409

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

- S Permit
- S/S Records/Reports
- S Operations & Maintenance - an Operator of Record Certificate must be displayed onsite.
- S Facility Site Review
- S Collection System
- S Flow Measurement
- M Laboratory - the permittee must write SOPs for parameters analyzed in the WWTP laboratory.
- S/S Effluent/Receiving Waters
- S/S Sludge Storage/Disposal
- N Pretreatment
- N Compliance Schedules
- S Self-Monitoring Program

D. SUMMARY OF FINDINGS/COMMENTS: As part of an enforcement action involving the permittee the Ohio EPA issued Director's Final Findings and Orders (DFFOs) on 1/30/08. The DFFOs were modified and reissued 8/20/08. Copies of the DFFOs can be found at <http://www.epa.state.oh.us/portals/35/enforcement/WalnutCrk.pdf> and <http://www.epa.state.oh.us/portals/35/enforcement/WalnutCrkMod08.pdf>. The DFFOs required WWTP and sanitary sewer system improvements necessary to provide consistent wastewater discharge permit compliance and to eliminate SSO events from the Leitnaker Road pump station. After the DFFOs were issued the permittee obtained substantial funding to aid improvements. A slightly revised time-line for improvements evolved as part of the funding process but the DFFOs were not further modified to reflect that revised time-line.

The WWTP operators indicated that new portions of the plant were placed into service in August 2010. The permittee recently installed an automatic influent screen but the screen has not performed properly and was out of service at the time of this inspection. The screen is a key piece of equipment since it helps prevent debris from migrating further into the WWTP and possibly clogging other components. The permittee is interacting with the screen manufacturer in an attempt to resolve screen problems. All major sanitary sewer collection system improvements have been completed.

The permittee intends continuing work necessary to replace several sanitary sewer clean-out caps in both Pleasantville and Thurston. Such work will further reduce possible sources of water inflow/infiltration into the sanitary sewer collection system

Upon completion of WWTP and sanitary sewer system improvements the permittee may proceed with documentation necessary to terminate the DFFOs. Item VI. Termination in the DFFOs reads as follows:

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

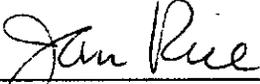
The certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(D)(4) for a municipal, state, or other public facility.

As is indicated in the DFFOs the certification should be sent to the following addresses:

Ohio Environmental Protection Agency
Central District Office
Division of Surface Water
Attn: DSW Enforcement Unit Supervisor
122 South Front Street
Columbus, Ohio 43215

Ohio Environmental Protection Agency
Lazarus Government Center
Division of Surface Water
Attn: Manager, Storm water and Enforcement Section
50 West Town Street, Suite 700 [P.O. Box 1049]
Columbus, Ohio 43215 [43216-1049]

[For mailings use the post office box number and zip code in brackets]



Inspector, Jan Rice, Ohio EPA, Central District Office

2/8/11

Date



Reviewer, Erin Sherer, Compliance & Enforcement Supervisor
Ohio EPA, Central District Office

2/9/11

Date

E. PERMIT VERIFICATION (Do Inspection Observations Verify 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 (last inspection 10/20/09)	*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.- the WWTP upgrade has been substantially completed.

F. COMPLIANCE

	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 Director's Final Findings and Orders (DFFOs)	*X			
e. Permittee is meeting compliance schedule	X			

Comments: a.- effluent limitation violations are listed in Attachment "A" of this report. d.- DFFOs were issued 1/30/08 and then modified and reissued 8/20/08.

G. OPERATION AND MAINTENANCE

Treatment Works:		Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed <u> </u>		X			
b. Adequate alarm system available for power or equipment failures		X			
c. All treatment units in service other than backup units			*X		
d. Wastewater Treatment Works classification (OAC 3745-7) Class II					
e. Operator of Record holds unexpired Class II and IV license required by permit.		*X			
f. Copy of certificate of Operator of Record displayed on-site			*X		
g. Minimum operator staffing requirements fulfilled (OAC 3745-7)		X			
System Classification	Staffing Requirement				
Class A	2 days per week for a minimum of 1 hour per week				
Class I	3 days per week for a minimum of 1.5 hours per week				
Class II	5 days a week for a minimum of 20 hours per week	X			
Class III and IV	5 days a week for a minimum of 40 hours per week				
h. Routine and preventive maintenance schedule/performed on time		X			
i. Any major equipment breakdown since last inspection			*X		
j. Operation and maintenance manual provided and maintained			*X		
k. Any plant bypasses since last inspection			X		
l. Regulatory agency notified of bypasses on MORS and/or Spill Hotline (1-800-282-9378)				X	
m. Any hydraulic and/or organic overloads experienced since last inspection			X		

Comments: c.- the south clarifier is not in use due to low flow through the plant and due to a plugged sludge return line. The permittee intends as soon as possible unplugging the sludge return line. e.- Mr. Ardrey holds a Class II wastewater certification; Mr. Kinder holds a Class IV wastewater certification. f.- the operators will obtain and display the Operator of Record certificate for this WWTP as soon as possible. i.- the new influent screen has not performed satisfactorily and was not in use at the time of this inspection. The permittee is interacting with the screen manufacturer in an attempt to remedy problems. j.- equipment manuals are available for use when needed.

Record Keeping:	Yes	No	N/A	N/E
a. Log book provided		*X		
b. Format of log book (Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.): *Information is available but is not in a hard bound book.				
c. Log book(s) kept onsite (in an area protected from weather)	X			
d. Log book(s) contain the following:				
I. Identification of treatment works	X			
II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	X			
III. Daily record of operation and maintenance activities (including preventative repairs and request for repairs)	X			
IV. Laboratory results (unless documented on bench sheets)				X
V. Identification of person making log entries				X
e. Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred		X		

Collection System:	Yes	No	N/A	N/E
a. Percent combined system: <u>0</u> %				
b. Any collection system overflows since last inspection (CSO <u> </u> SSO <u> </u>)		X		
c. Regulatory agency notified of overflow (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 alarm systems provided and maintained	X			
h. Are lift stations equipped with permanent standby power or equivalent	X			
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	*X			
j. Any complaints received since last inspection of basement flooding		X		
k. Are any portions of the sewer system at or near capacity		X		

Comments: *a - information is available but is not in a hard bound book. I - the permittee has been involved with an extensive inflow/infiltration removal program as required by the DFFOs. The majority of this work has been completed with minor issues still continuing to be addressed. As of the date of this inspection no SSO events from the Leitnaker Road Pump Station have been reported since the last inspection on 10/20/09.

G. SLUDGE MANAGEMENT

Sludge management plan (SMP)	Yes	No	N/A	N/E
a. Submitted date: _____ Approval#: _____ Not submitted: _____ N/A: Landfill disposal				
b. Sludge Management Plan current				X
c. Sludge adequately disposed (Method: Suburban Landfill)	X			
d. If sludge is incinerated, where is ash disposed of _____			X	
e. Is sludge disposal contracted (Name: Waste Management, Inc.)	X			
f. Has amount of sludge generated 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 (minimum 5 years)	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)				X

I. SELF-MONITORING PROGRAM

Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained Type of device: _____ ultrasonic & parshall flume _____ calculated from influent _____ weir _____ X Other (Specify: Magmeter) _____ ultrasonic & weir	X			
b. Calibration frequency adequate (date of last calibration _____)	*X			
c. Secondary instruments (totalizers, recorders etc.) operated and maintained	*X			
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: _____ X Daily _____ Weekly _____ Monthly _____ Other				

Comments: b - a new magmeter had been installed as part of the WWTP upgrade. The meter is scheduled for a calibration check in August 2011. c.- new instruments were installed as part of the WWTP upgrade should have calibration checks in August 2011..

Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method (see General Lab Criteria (GLC) Form pages 5 & 8)	X			
d. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			

Laboratory - General	Yes	No	N/A	N/E
a. Does laboratory have written Standard Operating Procedures (SOP's) for all analysis performed onsite (Note: SOP's are required per Standard Methods 1020A and states "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results.")		*X		
b. Do SOP's include the following if applicable:				
1. Title				X
2. Scope and Application				X
3. Summary				X
4. Sample Handling and Preservation				X
5. Interferences				X
6. Apparatus and Materials				X
7. Reagents				X
8. Procedure				X
9. Calculations				X
10. Quality Control				X
11. Maintenance				X
12. Corrective Action				X
13. Reference (Parent Method)				X
c. EPA approved analytical testing procedures used for all analysis (40 CFR 136.3)				X
d. If alternate analytical procedures are used, proper approval has been obtained				X
e. Analyses being performed more frequently than required by permit		X		
f. If (e) is yes, are results reported in permittee's self-monitoring report			X	

Comments: a.- SOPs are needed in the laboratory for CBOD, TSS, Dissolved Oxygen, pH and temperature monitoring.

Laboratory - Quality Control/Quality Assurance	Yes	No	N/A	N/E
g. Quality assurance manual provided and maintained		*X		
h. Satisfactory calibration and maintenance of instruments/equipment				*X
i. Results of latest USEPA quality assurance performance sampling program: N/A Satisfactory: _____ Marginal: _____ Unsatisfactory: _____				
j. Commercial laboratory used Parameters analyzed by commercial lab: metals, oil & grease, fecal coliform, ammonia, phosphorus Lab name: Coshocton Environmental Testing, Inc.	X			

Comments: *g.- a QA/QC manual must be provided and maintained for the laboratory. h.- a copy of the Ohio EPA General Lab Criteria Checklist was provided to the permittee for use in checking its laboratory procedures. Mr. Ardrey indicated that he periodically splits samples with CET for comparison of sample results.

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Outfall Sign Installed	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
1	Yes	None	None	None	Slight	None	Clear	

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 other than smokestacks		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 facilities		X		

Comments: a.- the permittee is working to improve conditions in the laboratory and office spaces at the WWTP.

Attachment "A"

Walnut Creek Sewer District
 Effluent Limitation Violations
 11/1/09 - 12/21/10

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PA00005*GD	February 2010	001	00530	Total Suspended Solids	7D Qty	21	24.9246	2/22/2010
4PA00005*GD	March 2010	001	00530	Total Suspended Solids	7D Qty	21	22.3778	3/1/2010
4PA00005*GD	June 2010	001	00300	Dissolved Oxygen	1D Conc	5.0	4.86	6/23/2010