



State of Ohio Environmental Protection Agency

FILE COPY

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June 24, ²⁰¹⁰~~2009~~

Mr. Ron Chaney
Ohio Department of Rehabilitation & Corrections
(Bureau of Construction, Activation & Maintenance)
868 Freeway Drive North
Columbus, OH 43229

Dear Mr. Chaney:

Enclosed is a report for a Compliance Evaluation Inspection that I conducted at the ODRC Southeast Correctional Institute (SCI) wastewater treatment plant (WWTP) on June 15, 2010. Mr. Jeff Hickman the WWTP superintendent met with me during the inspection.

Attachment "A" of the report lists wastewater discharge permit effluent limitation violations that have occurred since the time of the last inspection on June 10, 2009. Even though effluent violation frequency has declined, consistent compliance has not yet been attained. Continued violations are unacceptable.

In May 2009 Ohio EPA Compliance Assistance Unit (CAU) staff again assessed the SCI WWTP. In September 2009 ODRC was provided the CAU assessment results which contained improvements options.

Attachment "B" of this report provides permit compliance schedule deadlines for WWTP improvements. Please advise this office in writing as soon as possible regarding the approach that will be used for improving this WWTP.

If you have questions regarding this report I can be reached by telephone at 614-728-3850 or by e-mail at jan.rice@epa.ohio.gov.

Sincerely yours,

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

Enclosure

c: Mr. Jeff Hickman, Ohio Department of Rehabilitation & Corrections, Southeast Correctional Institute

JAR/nsm SEOTC 6-15-10CEIcavltr

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



NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. 4PP00011*DD	NPDES No. OH1010630	Date 6/15/10	Inspection Type CEI	Inspector S	Facility Type 2
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B. FACILITY DATA

Name and Location of Facility Inspected Ohio Department of Rehabilitation & Correction (ORDC Southeast Correctional Institute) 5900 B.I.S. Road Lancaster, Ohio 43130	Entry Time 9:00 A.M.	Permit Effective Date 9/1/09
	Exit Time 11:00 A.M.	Permit Expiration Date 8/31/14

Name(s) and Title(s) of On-Site Representative(s) Jeff Hickman, Superintendent	Phone Number(s) 740-653-4324 (ext.:2117)
Name(s) Address and Title(s) of Operator of Record Jeff Hickman, Operator of Record, 5900 B.I.S. Road, Lancaster, Ohio 43130	Phone Number(s) 740-653-4324 (ext.:2117)
Name, Address and Title of Responsible Official Ron Chaney, ODRC Engr. Dpt., 820 Freeway Dr. N., Columbus, Ohio 43229	Phone Number 614-752-1052

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

- S Permit
- S/S Records/Reports
- S/S Operations & Maintenance
- M Facility Site Review – rated marginal due to the condition of various older components in this WWTP. Spalling concrete is noticeable at several locations within the WWTP. The permittee is considering options to resolve these problems and for other plant improvements.
- N Collection System
- M Flow Measurement - current location of the flow meter does not allow representative monitoring of the wastewater/storm water flow through the effluent sand filters.
- S Laboratory
- M/S Effluent/Receiving Waters – wastewater discharge permit effluent limitation violations are listed in Attachment "A" of this report. Continued violations are unacceptable.
- S/S Sludge Storage/Disposal
- N Pretreatment
- S Compliance Schedules - the permit compliance schedule is included as Attachment "B" in this report.
- S Self-Monitoring Program

D. SUMMARY OF FINDINGS/COMMENTS: The permittee has not yet committed to a plan to improve this WWTP. Ohio EPA Compliance Assistance Unit (CAU) staff visited this facility again in May 2009 to assess the plant and provided improvements options later that year for ODRC consideration. ODRC must very soon determine a course of action for improving this WWTP. The NPDES permit schedule of compliance requires submittal of a Permit to Install by September 1, 2010 for WWTP improvements.

Jan Rice
 Jan Rice, Inspector, Ohio EPA, Central District Office

6/24/10
 Date

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

6.25.10
 Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

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. - WWTP operators have been modifying treatment processes and revising the flow routing from one treatment unit to another in an attempt to provide consistent compliance. The flow equalization tanks have been converted for use as aeration tanks. The two trickling filters have been partially decommissioned since effluent limitation compliance can be obtained without their use. One of the two primary clarifiers has been converted into a sludge holding tank.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection (last inspection was 6/10/09)	*X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in: Permit	X			
e. Permittee is meeting compliance schedule	*X			

Comments: *a. - effluent limitation violations are listed in Attachment "A" of this report. e. - Part I, C, Schedule of Compliance from the permit is included as Attachment "B".

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 _____	*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 operating staff provided: # of shifts <u>1</u> , <u>5</u> Days/Week	X			
e. Operator holds unexpired license of class required by permit Class: <u>II</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 _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		*X		

Comments: *a. - a 100KW generator with automatic switch gear was installed late in 2008 to power the entire WWTP when necessary. e. - The permit classifies this WWTP as a Class II plant. The superintendent holds a Class III wastewater certification. If not already done, the superintendent should notify this office through use of the form available at this website http://www.epa.state.oh.us/portals/35/opcert/Operator_of_Record_Notification_Form.pdf that he is the Operator of Record for this WWTP. Mr. Hickman indicated that a backup Class III and Class I Operator is available if necessary. g. - the primary clarifier flight boards needed repair in January/February, 2010. h. - equipment manuals are available for use if needed. k. - storm water runoff into the effluent sand filters and sludge drying beds impacts operation of those components. The permittee is working to address this problem.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0</u> %				
b. Any collection system overflows since last inspection (CSO ___ SSO ___)		X		
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and 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		

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 facilities		X		

Attachment "A"

ORDC Southeast Correctional Institute
 Effluent Limitation Violations
 6/1/09 - 5/31/10

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PP00011*CD	June 2009	001	01119	Copper, Total Recovers	30D Conc	29	31.	6/1/2009
4PP00011*CD	August 2009	001	01119	Copper, Total Recovers	30D Conc	29	67.	8/1/2009
4PP00011*CD	August 2009	001	01119	Copper, Total Recovers	30D Qty	0.029	.05397	8/1/2009
4PP00011*CD	August 2009	001	01119	Copper, Total Recovers	1D Conc	35	67.	8/13/2009
4PP00011*CD	August 2009	001	01119	Copper, Total Recovers	1D Qty	0.035	.05397	8/13/2009
4PP00011*DD	October 2009	001	31616	Fecal Coliform	7D Conc	2000	4386.34	10/15/2009
4PP00011*DD	December 2009	001	01119	Copper, Total Recovers	30D Conc	24	40.	12/1/2009
4PP00011*DD	December 2009	001	01119	Copper, Total Recovers	30D Qty	0.036	.0369	12/1/2009
4PP00011*DD	December 2009	001	01119	Copper, Total Recovers	1D Conc	34	40.	12/28/2009
4PP00011*DD	January 2010	001	80082	CBOD 5 day	30D Conc	10	10.25	1/1/2010
4PP00011*DD	January 2010	001	80082	CBOD 5 day	7D Conc	15	16.5	1/8/2010
4PP00011*DD	February 2010	001	80082	CBOD 5 day	30D Conc	10	10.375	2/1/2010
4PP00011*DD	February 2010	001	80082	CBOD 5 day	7D Conc	15	16.5	2/15/2010

Part I, C - Schedule of Compliance

I. Municipal Construction Schedule

This entity shall evaluate the ability of its existing treatment facilities to meet the final effluent limits at outfall 4PP00011001 and attain compliance with the final effluent limitations of the permit as expeditiously as practicable, but not later than the dates developed in accordance with the following schedule:

- a. Submit an approvable Permit To Install for plant improvements to achieve compliance, as soon as possible, but not later than 12 Months from the effective date of this permit. Improvements should, as a minimum, contain necessary improvements to the UV disinfection system. (Event Code 01299)
- b. Commence construction (if necessary) as soon as possible, but not later than 18 Months from the effective date of this permit. (Event Code 03099)
- c. Notify the Ohio EPA Central District Office within seven days of the start of construction
- d. Complete construction (if necessary) as soon as possible, but not later than 24 Months from the effective date of this permit. (Event Code 04599)
- e. Notify the Ohio EPA Central District Office within seven days of construction completion.
- f. Meet final effluent limitations as soon as possible, but not later than 36 Months from the effective date of this permit. (Event Code 05599)

- Item 1a. due date - 9/1/10
- Item 1b. due date - 3/1/11
- Item 1d. due date - 9/1/11
- Item 1f. due date - 9/1/12