

4PW00000

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 30, 2008

Dennis Williams  
Earnhart Hill Regional Water & Sewer District  
P.O. Box 151  
Circleville, Ohio 43113

Re: **4PW00000/OH0070467**  
**Earnhart Hill Regional Water & Sewer District WWTP**  
**Compliance Inspection**  
**Pickaway County**

Dear Mr. Williams:

Enclosed is the Compliance Inspection Report for the Earnhart Hill Regional Water & Sewer District. This inspection was conducted on July 22, 2008, by Ohio EPA personnel. The purpose of this inspection was to evaluate compliance with the NPDES permit. At the time of the inspection, the facility was acceptable, but it was at flow design capacity of 0.015 MGD.

After review of the submitted MOR flow data, it appears that the sanitary sewer collection system is plagued with infiltration and/ or inflow of clean water; see attached graph. Excessive clean water flow into the sanitary sewer system shall cause wastewater treatment plant upset and allow degradation of the unnamed tributary to the Scioto River.

To avoid escalated enforcement action, perform the specified actions below on or before November 20, 2008.

1. Televis and smoke test the collection system, and identify the areas that need repair.
2. Develop an implementation schedule to correct the deficient areas.
3. Provide this office with the findings and schedule for review.

If you have any questions, comments, or concerns, please call me at (614) 728-3847.

Sincerely,

Sherree Gossett-Johnson  
Environmental Specialist II  
Compliance and Enforcement Unit, Division of Surface Water  
Central District Office

Enclosure

SGJ/nsm Earnhart Hill 2008

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

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit # 4PW00000	NPDES OH0070467	Mo/Day/Yr 7/22/2008	Insp. Type C	Inspector S	Watershed Scioto
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Section B: Facility Data

Facility Name:	<u>Earnhart Hill Regional Water and Sewer District</u>	Entry Time	Permit Eff. Date
Address:	<u>24991 US Rt. 23 South</u>	10:00 a.m.	June 1, 2004
City/State/Zip:	<u>Circleville, OH 43113</u>	Exit Time	Permit Exp. Date
		11:00 a.m.	May 31, 2009

On-Site Representatives

Name: Brent Hays  
 Title: Superintendent  
 Phone: 740 474-3114

Responsible Official

Name/Title: Dennis Williams  
 Address: P.O. Box 151, Circleville, OH, 43113  
 Phone: 740 474 3114

Section C: Areas Evaluated During Inspection:

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

Permit	S	Effluent/ Receiving Waters	S
Records/Reports	S	Sludge Storage/ Disposal	S
Operations & Maintenanac	S	Pretreatment	N
Facility Site Review	S	Compliance Schedules	N
Collection System	U	Self-Monitoring Program	S
Flow Measurement	S	Other	
Laboratory	N		

Section D: Summary of Findings/Comments:

This WWTP is at its capacity. Due to the "spikes" in flow, see attached graph, please provide this office with your collection system findings and what corrective measures you shall implement to correct the deficiencies.

Name of Inspector: Sheree Gossett-Johnson

Signature:

Ohio EPA, Central District Office

Date:

7/28/08

Name of Reviewer: Erin Sherer

Signature:

Ohio EPA, Central District Office

Date:

7/29/08

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:

Your flow spikes suggest inflow, see attached graph, please determine what corrective actions shall be taken.  
suggest

**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 : 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 #SHIF 1 DAYS/Wk daily X
- (e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS PROVIDED BY PERMIT- CLA II 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:

See graph [redacted]

**Section G. Operation & Maintenance (continued)**

Yes No N/A N/E

**COLLECTION SYSTEM:**

- (a) PERCENT COMBINED SYSTEM: %
- (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:**

Replacement sewer lines are "in progress" as well as manhole repair.

**Section H. Sludge Management**

Yes No N/A N/E

- (a) SLUDGE MANAGEMENT PLAN (SMP) X  
IF YES, DATE SUBMITTED:  
APPROVAL #
- (b) SLUDGE MANAGEMENT PLAN CURRENT X
- (c) SLUDGE ADEQUATELY DISPOSED OF: METHOD- X
- (d) IS SLUDGE INCINERATED X  
IF YES, ASH IS DISPOSED AT:
- (e) IS SLUDGE DISPOSAL CONTRACTED X  
IF YES, CONTRACTOR NAME:
- (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:**

The plant is at capacity

**Section I. Self Monitoring Program**

**Part I. Flow Measurement**

Yes No N/A N/E

- (a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED X  
TYPE OF FLOW MEASURING: Parshall Flume
- (b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration) April, 2008 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 X MONTHLY  
WEEKLY OTHER

**COMMENTS/STATUS:**

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

**Part 3. Laboratory**

	Yes	No	N/A	N/E
(a) EPA APP. ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)		X		
(b) IF ALTERNATE PROCEDURES ARE USED,		X		
(c) ANALYSIS PERFORMED MORE FREQUENTLY THAN REQUIRED BY THE PERMIT		X		
(d) IF (c) IS YES, ARE RESULTS RECORDED IN REPORT				X
(e) COMMERCIAL LABORATORY USED	X			
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB: <u>Metals, O/G and Fecal.</u>				
(2) LAB NAME: <u>City of Circleville</u>				
(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 USEPA QUALITY ASSURANCE DATE:	NA	Satisfactory		
	NA	Marginal		
	NA	Unsatisfactory		

COMMENTS/STATUS:

**Section J. Effluent/Receiving Water Observations**

OUTFALL NO.	OIL SHEEN	VISIBLE GREASE	VISIBLE TURBIDITY	FOAM	FLOATING SOLIDS	COLOR	OTHER
1	NONE	NONE	NONE	NONE	NONE	CLEAR	

**Section K. Multimedia Observations**

	Yes	No	N/A	N/E
(a) ARE THERE ANY INDICATIONS OF SLOPPY HOUSEKEEPING OR POOR MAINTENANCE IN WORK AND STORAGE AREAS OR LABORATORIES.				X
(b) DO YOU NOTICE STAINING OR DISCOLORATION OF SOILS				X
(c) DO YOU NOTICE DISTRESSED VEGETATION				X
(d) DO YOU SEE UNIDENTIFIED DARK SMOKE OR DUSTCLOUDS COMING FROM SOURCES OTHER THAN SMOKESTACKS				X
(e) DO YOU NOTICE ANY UNUSUAL COLORS OR STRONG CHEMICAL SMELLS				X
(f) DO YOU SEE ANY OPEN OR UNMARKED DRUMS, UNSECURED LIQUIDS, OR DAMAGED CONTAINMENT FACILITIES?				X

IF ANY OF THE ABOVE ARE OBSERVED, ASK THE FOLLOWING QUESTIONS:

- (1) WHAT IS THE CAUSE OF THE CONDITION?
- (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/STATUS:

# Earnhart Hill WWTP Flow

