



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Dayton, Ohio 45402

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

File: Prob Co  
Lewisburg WWTP  
Sewerage

October 5, 2009

**CERTIFIED MAIL**

Mayor and Council, Lewisburg  
112 South Commerce Street  
Lewisburg, Ohio 45338

**RE: Lewisburg WWTP 1PB00019\*HD Compliance Evaluation Inspection and Notice of Violation**

Ladies and Gentlemen:

On September 24, 2009 Maureen Ware, Angela Dripps, and I conducted a Compliance Evaluation Inspection at the Lewisburg WWTP facility. Troy Burke, Steve Jackson, and Jeffrey Sewert represented the Village of Lewisburg. A copy of the inspection report is enclosed.

The inspection revealed a violation of your NPDES permit. The presence of sewage sludge in the receiving stream is a violation of your NPDES permit 1PB00019\*HD Part III 2A, GENERAL EFFLUENT LIMITATIONS, which says that the effluent shall, at all times, be free of substances in amounts that will settle to form putrescent, or otherwise objectionable sludge deposits; or that will adversely affect aquatic life or water fowl. Sewage sludge was present from the WWTP outfall to at least 300 feet downstream. Please see the attached photographs.

As indicated on the NPDES CEI form, of the areas evaluated during the inspection, one was rated as marginal, Collection System, and six were rated as unsatisfactory: Record/Reports, Operations & Maintenance, Flow Measurement, Laboratory, Self-Monitoring Program, and Effluent/Receiving Waters.

**Collection System** was rated as marginal due to the lack of a documented effort to remove infiltration and inflow from the collection system.

**Records/Reports** was rated as unsatisfactory due to the apparent lack of approved analytical methods being used by Lewisburg. There were no Standard Operating Procedures for the majority of the laboratory procedures.

**Operation & Maintenance** was rated as unsatisfactory due to signs of a lack of adequate sludge wasting (appearance of old biomass in the aeration basin, sludge clumps floating on the entire clarifier surface, sludge lining the inside and outside of the clarifier trough). The clarifier troughs appeared to not be level and had algae blocking many of the v-notches causing major short circuiting. Please see attached photographs. The operator stated that the clarifier troughs were only cleaned when the clarifiers are taken down for major repairs, which is not consistent with the clarifier weir/trough cleaning SOP provided in 2007. It is possible the clarifier operational problems may also be exacerbated by the presence of filamentous bacteria which prevents proper solids settling. We recommend the mixed liquor be examined under a microscope to determine if that is the case.

The UV disinfection system was using bulbs that had been in place for over 2 disinfection seasons (over 8760 hours). The manufacturer recommends bulb replacement after 3000 hours of operation. The only replacement UV bulbs on site were used ones that had lost efficiency. There was no SOP for cleaning the UV bulbs. A return pump had failed, and instead of having a replacement on-site, it took 2 weeks to have the return pump refurbished and put back in place.

**Flow Measurement** was rated as unsatisfactory due to the WWTP bypass flow not being measured.

**Laboratory** was rated as unsatisfactory due to Lewisburg not keeping the Chain of Custody forms returned with the laboratory results from Belmont Laboratory showing date and times of receipt by the lab. None of the laboratory thermometers had been calibrated. Lewisburg is noting dates of receipt and dates of opening on the reagent bottles but several of the reagents were significantly past expiration dates. Lewisburg had a written SOP for their ammonia-N analysis procedure but not for any of the other analyses they do. The four plastic bottles used to collect samples for CBOD and TSS were upside down on the drainer next to the sink. When examined, two of the bottles had a green algae film across the bottom of the inside of the container. Lewisburg said they had been used the day before. The typical number of hours the Operator of Record spends at the WWTP per week is approximately 10 hours. This seems inadequate given the operational needs of the WWTP plus the lab analyses work currently being performed.

**Self-Monitoring Program** was rated as marginal due to using the incorrect sampling procedure for oil and grease.

**Effluent/Receiving Waters** was rated as unsatisfactory due to sludge being present from the WWTP outfall to at least 300 feet downstream. Solids in the effluent decrease the effectiveness of the UV disinfection system and causes potential health hazards as the creek runs through a public park.

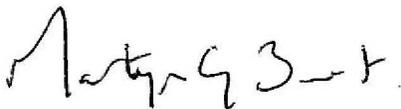
Mayor and Council, Lewisburg  
October 5, 2009  
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Please be advised that failure to comply with the requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please submit a written response to this office by October 16, 2009 indicating the steps you have taken or intend to take to correct the above violation and the unsatisfactory/marginal ratings.

If you have any questions or comments concerning the contents of this letter, please feel free to contact me at (937) 285-6034 or by e-mail at [martyn.burt@epa.state.oh.us](mailto:martyn.burt@epa.state.oh.us), or Ms. Ware at (937) 285-6103 or by e-mail at [maureen.ware@epa.state.oh.us](mailto:maureen.ware@epa.state.oh.us).

Sincerely,



Martyn G. Burt, CPM  
Environmental Supervisor  
Division of Surface Water

Enclosures

Ec: Preble County Health Department

MGB\bp



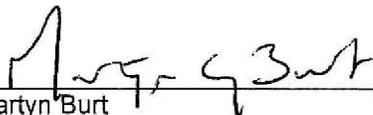
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00019	OH0026051	09/25/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Lewisburg WWTP 400 Tillman Lane Lewisburg, Ohio	9:30AM	4/1/2005
	Exit Time	Permit Expiration Date
	12:45PM	3/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Troy Burke, Operator of Record	937-313-0805	
Steve Jackson, Operator		
Jeffrey A. Sewert, Municipal Manager	937-962-4377	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council, Lewisburg 112 South Commerce St. Lewisburg, Ohio 45338	937-962-4377	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	U	Flow Measurement	N	Pretreatment
U	Records/Reports	U	Laboratory	N	Compliance Schedule
U	Operations & Maintenance	U	Effluent/Receiving Waters	U	Self-Monitoring Program
	Facility Site Review		Sludge Storage/Disposal		Other
M	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See comments under individual sections.	
Inspector	Reviewer
 Maureen M. Ware Division of Surface Water Southwest District Office	 Martyn Burt Environmental Supervisor Division of Surface Water Southwest District Office
10/5/09 Date	10/5/09 Date

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee .....N
- (b) Correct name and location of receiving waters.....Y
- (c) Product(s) and production rates conform with permit application (Industries).....N/A
- (d) Flows and loadings conform with NPDES permit.....Y
- (e) Treatment processes are as described in permit application...Y
- (f) New treatment process(es) added since last inspection.....N
- (g) Notification given to State of new, different or increased discharges.....N/A
- (h) All discharges are permitted.....Y
- (i) Number and location of discharge points are as described in permit.....Y

Comments/Status:

Correct mailing address should be 400 Tillman Lane.

**Section F: Compliance**

- (a) Any significant violations since the last inspection.....N
- (b) Permittee is taking actions to resolve violations.....N/A
- (c) Permittee has a compliance schedule.....N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule.....N/A

Comments/Status:

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**Section G: Operation & Maintenance**

**Treatment Works:**

- (a) Standby power available.....generator [X] or dual feed [ ].....Y
- (b) Adequate alarm system available for power or equipment failures..Y
- (c) All treatment units in service other than backup units.....Y
- (d) Wastewater Treatment Works classification (OAC 3745-7).....II
- (e) Operator of Record holds unexpired license of class required by permit.....Y  
Class: II
- (f) Copy of certificate of Operator of Record displayed on-site.....Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)...Y
- (h) Routine and preventative maintenance scheduled/performed.....N\*
- (i) Any major equipment breakdown since last inspection.....Y\*
- (j) Operation and maintenance manual provided and maintained....Y
- (k) Any plant bypasses since last inspection.....N
- (l) Regulatory agency notified of bypasses.....N/A  
On MORs  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection.....N

**Record Keeping:**

- (a) Log book provided.....Y
- (b) Format of log book (i.e. computer log, hard bound book)  

Hardbound.
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- (c) Log book(s) kept onsite (in an area protected from weather).....Y
- (d) Log book contains the following:
  - I. Identification of treatment works.....Y
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7.....Y
  - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs).....Y
  - IV. Laboratory results (unless documented on bench sheets)...Y
  - V. Identification of person making log entries.....Y
- (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.....Y

**Section G: Operation & Maintenance (cont.)**

**Collection System:**

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection.....N  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs).....N/A
- (d) CSO O&M plan provided and implemented.....N/A
- (e) CSOs monitored and reported in accordance with permit.....N/A
- (f) Portable pumps used to relieve system.....Y
- (g) Lift station alarms provided and maintained.....Y
- (h) Are lift stations equipped with permanent standby power  
or equivalent.....N
- (i) Is there an inflow/infiltration problem (separate sewer system),  
or were there any major repairs to collection system since  
last inspection.....Y&N\*\*\*
- (j) Any complaints received since last inspection of basement flooding...N
- (k) Are any portions of the sewer system at or near capacity.....N

**Comments/Status:**

Manhole sealing is the only recent I/I repair work done to the collection system. Routine and preventative maintenance appears to not have been scheduled/performed as sludge was noted floating in the clarifier, lining the clarifier trough, and in the creek from the outfall to at least 300 feet downstream. The clarifier troughs appeared to not be level and had algae blocking many of the v-notches causing major short circuiting. The operator stated that the clarifier troughs were only cleaned when the clarifiers are taken down for major repairs. This is not consistent with the clarifier weir/trough cleaning SOP provided in 2007. The UV disinfection system was using bulbs that had been in place for over 2 disinfection seasons (over 8760 hours). The manufacturer's recommendation for bulb replacement is after 3000 hours of operation. The only replacement UV bulbs on site were used ones that had lost efficiency. There was no SOP for cleaning the UV bulbs. A return pump had failed. It took 2 weeks to have the return pump refurbished and put back in place.

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date:                      Approval #:                      Not submitted     N/A
- (b) Sludge management plan current..... N
- (c) Sludge adequately disposed.....\*  
(Method: land application)
- (d) If sludge is incinerated, where is ash disposed of .....N/A
- (e) Is sludge disposal contracted.....N  
(Name:                      )
- (f) Has amount of sludge generated changed significantly since  
last inspection.....N
- (g) Adequate sludge storage provided at plant.....Y
- (h) Land application sites monitored and inspected per SMP.....Y
- (i) Records kept in accordance with State and Federal law.....Y
- (j) Any complaints received in last year regarding sludge.....N
- (k) Is sludge adequately processed (digestion, pathogen control).....\*\*

**Comments/Status:**

Lewisburg's sludge management plan was dated 1995. The sludge rules have changed since then. \*Sludge is not being wasted from the WWTP at adequate rates. \*\*See Jacob Howdyshell's September 2008 Sludge CEI.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary flow measuring device operated and maintained.....Y  
Type of device: Ultrasonic & Parshall flume [ ] Ultrasonic & Weir [X] Weir [ ]  
Calculated from influent [ ]                      Other [ ](Specify:                      )
- (b) Calibration frequency adequate .....Y  
(Date of last calibration: 11/08)
- (c) Secondary instruments operated and maintained.....Y
- (d) Flow measurement equipment adequate to handle full range  
of flows.....Y
- (e) Actual flow discharged is measured.....N
- (f) Flow measuring equipment inspection frequency  
[X]Daily [ ]Weekly [ ]monthly [ ]other

**Comments/Status:**

The WWTP bypass is not being monitored.

**Section I: Self-Monitoring Program (cont.)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit.....Y
- (b) Parameters and sampling frequency agree with permit.....Y
- (c) Permittee uses required sampling method.....N
- (d) Sample collection procedures are adequate.....N
  - (i) Samples refrigerated during compositing.....Y
  - (ii) Proper preservation techniques used.....Y
  - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3.....Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records).....Y
- (f) Adequate records maintained of sampling date, time, location, etc..Y

**Laboratory:**

*General*

- (a) EPA approved analytical testing procedures used (40 CFR 136.3)..N
- (b) If alternate analytical procedures are used, proper approval has been obtained.....N
- (c) Analyses being performed more frequently than required by permit...Y
- (d) If (c) is yes, are results in permittee's self-monitoring report.....Y
- (e) Commercial laboratory used.....Y  
Parameters analyzed by commercial lab: Metals and fecal coli.

Lab name: Belmont

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained.....N
  - (g) Satisfactory calibration and maintenance of instruments/equipment. ..Y&N
  - (h) Adequate records maintained..... N
  - (i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory
- Date:

**Comments/Status:**

All samples, including Oil and Grease, are taken using an HDPE dipper. Oil and Grease samples must be grabbed directly into a glass container. With the exception of Ammonia-N, there are no SOP's, so it can't be determined if EPA approved analytical testing procedures are being used for anything except Ammonia-N. No QA/QC manual was provided for the laboratory. Some laboratory equipment had been calibrated. Some testing vessels were visibly dirty, some had algae visible in them. Lewisburg is not keeping the Chain of Custody returned with the results showing date and times of

receipt by the lab. Some reagent bottles were past their expiration date. Some reagents were filled from the WTP, so the expiration date could not be determined. The laboratory lacks a microscope. The typical number of hours the Operator of Record spends at the WWTP per week is only 10 hours. This seems inadequate given the operational needs of the WWTP plus the lab analyses work currently being performed.

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

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Y	N	N	N	N	Y	N	N

**Comments/Status:**

While the effluent appeared clear coming out of the outfall pipe, there was sewage sludge in the pooled area the pipe discharged into as well as at least 100 yards downstream. Algae mats formed over areas of sludge that were in more shallow areas.

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories.....Y
- (b) Do you notice staining or discoloration of soils, pavement or floors...N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation..N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks.....N
- (e) Do you notice any unusual odors or strong chemical smells.....N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

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:**



Photographs of the Lewisburg WWTP final clarifiers 9/24/2009 showing solids in the clarifier overflow trough (top left), clumps of solids rising to the clarifier surface (top right), algae fouling of clarifier weir and clumps of solids leaving the clarifier (bottom).



Sewage solids in Twin Creek downstream of Lewisburg WWTP outfall, 9/24/2009



Algal mat over sewage sludge in Twin Creek downstream of Lewisburg WWTP 9/24/2009

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