

February 10, 2010

RE: CITY OF LOUISVILLE WWTP
NPDES 3PD00033
2010 CEI
STARK COUNTY

Bill Glick, Superintendent
City of Louisville
215 South Mill St.
Louisville, OH 44641-1699

Dear Mr. Glick:

On January 3, 2010 this office conducted a compliance evaluation inspection (CEI) of the City of Louisville Wastewater Treatment Plant (WWTP). Present during the inspection were this writer and Rich Goebeler, City of Louisville. You were not present due to personal reasons. Below you will find a summary of the inspection:

General

The Louisville WWTP underwent major modifications in 1988 and is currently a secondary sewage treatment plant with an average daily design flow 2.0 MGD and a peak hydraulic design flow of 6.2 MGD. Modifications to the plant were made in 2008 with an approved PTI for the installation of a mechanically cleaned bar screen to replace the comminutor. The existing flow equalization basin located at the plant was upgraded with a new concrete floor and the side slopes lined with a 60 mil synthetic liner. Additional modifications to the plant have been made to the plant without approved PTI's and will be discussed further.

The treatment works generally consist of flow equalization, raw wastewater pumping, primary settling, aeration tankage, clarification, chlorination, dechlorination, aerobic digesters, belt filter press, and surface sludge drying beds. Final discharge is to the East Branch of the Nimishillen Creek.

Inspection Observations (Pics attached)

- 1) The primary clarifiers continue to be being bypassed, due to the low organic content of the influent. The raw pumps are pumping influent to the primary clarifier effluent trough. Wastewater then enters aeration cells 1, 2, and 3 and subsequently cells 4, 5, and 6. Coarse bubble aeration is present in the basins 1, 2, and 3. Fine bubble aeration is used in basins 4, 5, and 6. The color of the aeration basin contents was a dark chocolate brown.
- 2) Aerobic digesters 1, 2, 3, and 7 were in use. Number 6 digester is being used to store an industrial wastewater from H-P Products, Inc.

- 3) In the past Phosphoric Acid was added to aeration to provide Phosphorus as a nutrient. Currently it is not being added.
- 4) At the time of the inspection there was a significant quantity of floating solids in the four clarifiers, some worse than others. This was also noted in a recent inspection by Chris Moody, DSW, NEDO during a sludge inspection on January 19, 2010. A small amount of the solids were observed overflowing the clarifier weirs into the weir troughs. An accumulation of algae was also present on the weirs.
- 5) Sludge is pressed approximately five times per week and is disposed at American Landfill, Stark County.
- 6) The number 1 sludge drying bed is being used for drying sewer vacuum waste.
- 7) There were no sanitary sewer system overflows (SSOs) from July 1, 2008 thru December 2009. The City has implemented a sanitary sewer system maintenance program which has focused on the problem areas in the collection system. These areas are regularly (1/week) jetted to prevent sewer backups. On a monthly basis routine older sewers are cleaned at locations that are known to build up with grease.
- 8) There were no noted visual problems with the final discharge at the time of the inspection.

A review of your Discharge Monitoring Reports (DMRs) covering the period August 1, 2006 thru December 2009 revealed the following effluent violations:

Numeric Violations

None

Frequency Violations

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
November 2008	001	Dissolved Oxygen	1/Day	1	0	11/27/2008
November 2008	001	Dissolved Oxygen	1/Day	1	0	11/28/2008
November 2008	001	Dissolved Oxygen	1/Day	1	0	11/29/2008
November 2008	001	Dissolved Oxygen	1/Day	1	0	11/30/2008
December 2008	581	Copper, Total In Sludge	2/Year	1	0	12/01/2008
December 2008	581	Lead, Total In Sludge	2/Year	1	0	12/01/2008
December 2008	581	Nickel, Total In Sludge	2/Year	1	0	12/01/2008
December 2008	581	Zinc, Total In Sludge	2/Year	1	0	12/01/2008
December 2008	581	Selenium, Total In Slu	2/Year	1	0	12/01/2008
December 2008	581	Sludge Weight	2/Year	1	0	12/01/2008
December 2008	581	Mercury, Total In Slud	2/Year	1	0	12/01/2008
December 2008	581	Molybdenum In Sludge	2/Year	1	0	12/01/2008
December 2008	581	Fecal Coliform in Slud	2/Year	1	0	12/01/2008

December 2008	581	Sludge Fee Weight	2/Year	1	0	12/01/2008
May 2009	001	Total Suspended Solids	3/Week	3	2	05/01/2009
May 2009	001	Nitrogen, Ammonia (NH3)	3/Week	3	2	05/01/2009
May 2009	001	Fecal Coliform	3/Week	3	2	05/01/2009
May 2009	001	CBOD 5 day	3/Week	3	2	05/01/2009
May 2009	601	Total Suspended Solids	3/Week	3	2	05/01/2009
May 2009	601	CBOD 5 day	3/Week	3	2	05/01/2009

Additional Non-compliance

- 1) Part I,C of your NPDES permit (Schedule of Compliance) required the City to submit an engineering plan to control inflow and infiltration (I&I) in the collection system to Ohio EPA by May 1, 2006. In our last inspection letter dated June 9, 2008 authored by Dean Stoll, DSW, NEDO this was brought to the City of Louisville' attention. Our records reveal that this plan was not submitted to Ohio EPA. Therefore, you are in noncompliance with your NPDES permit.
- 2) In our June 9, 2008 letter the City was informed that the installation of the bypass line around the primary clarifiers and the installation of the sludge polymer feed system require a permit-to-install (PTI) from Ohio EPA. We requested that a PTI Application be submitted within 90 days of the aforementioned letter. To date we have not received this Permit to Install Application. This is a violation of Ohio Revised Code 6111.44 " A) Except as otherwise provided in division (B) of this section, in section 6111.14 of the Revised Code, or in rules adopted under division (G) of section 6111.03 of the Revised Code, no municipal corporation, county, public institution, corporation, or officer or employee thereof or other person shall provide or install sewerage or treatment works for sewage, sludge, or sludge materials disposal or treatment or make a change in any sewerage or treatment works until the plans therefore have been submitted to and approved by the director of environmental protection. Sections 6111.44 to 6111.46 of the Revised Code apply to sewerage and treatment works of a municipal corporation or part thereof, an unincorporated community, a county sewer district, or other land outside of a municipal corporation or any publicly or privately owned building or group of buildings or place, used for the assemblage, entertainment, recreation, education, correction, hospitalization, housing, or employment of persons."
- 3) The NPDES Permit expired on January 31, 2010. On March 31, 2009 the City was sent a letter that indicated the permit was expiring and enclosed the necessary applications for renewal. The application was to be completed and submitted to this office no later than July 31, 2009. It was received on January 29, 2010. This is a violation of the Code of Federal Regulations 122 Subpart B and Ohio Administrative Code 3745-33-03.

Bill Glick, Superintendent
City of Louisville
February 2, 2010
Page 4

Action Items

- 1) No later than March 1, 2010 respond in writing to this office with your intentions to comply with the NPDES permit and Ohio Revised Code 6111, specifically:
 - a) Part I, C- Schedule of Compliance contained in NPDES Permit 3PD00033*GD.
 - b) Submission of a Permit to Install Application for the bypass line around the clarifiers and the polymer feed system.
- 2) No later than March 31, 2010 you are directed to submit as built drawings for the bypass line and the polymer feed system.

We are considering initiating an enforcement action should you not comply with the above listed Action Items. If you have any questions or comments regarding this letter, please feel free to contact this office at (330) 963-1136.

Sincerely,

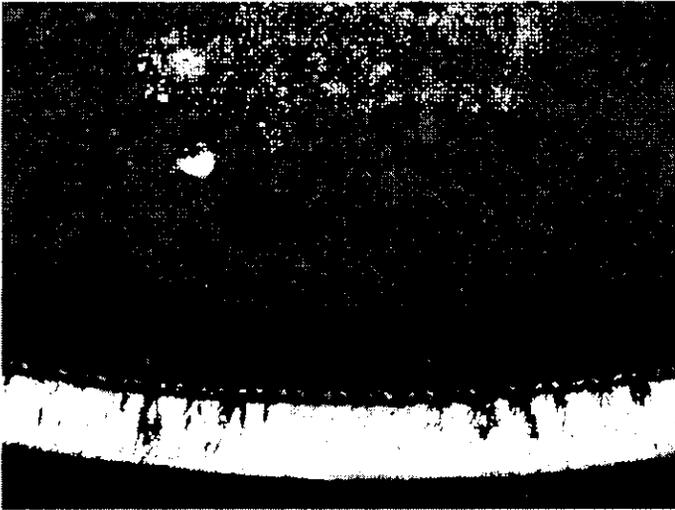
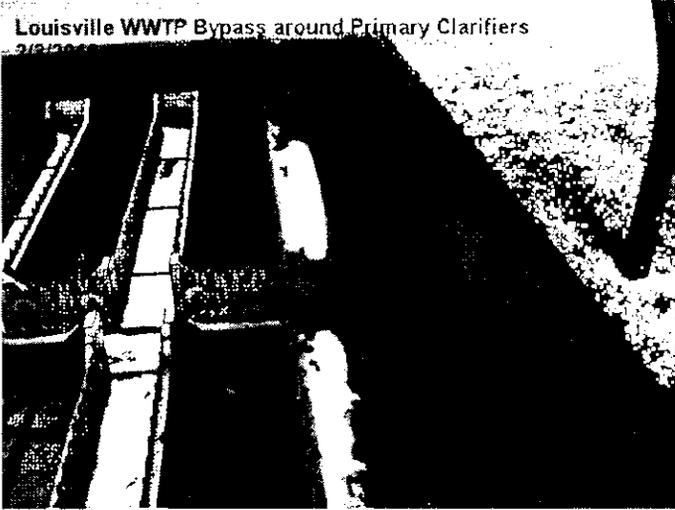
Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

cc: Mayor and Council, City of Louisville
James McBeath, Director of Service Operations, City of Louisville
Dean Stoll, Enforcement Coordinator, DSW, NEDO

File: Public/Permit Compliance

Bill Glick, Superintendent
City of Louisville
February 2, 2010
Page 5

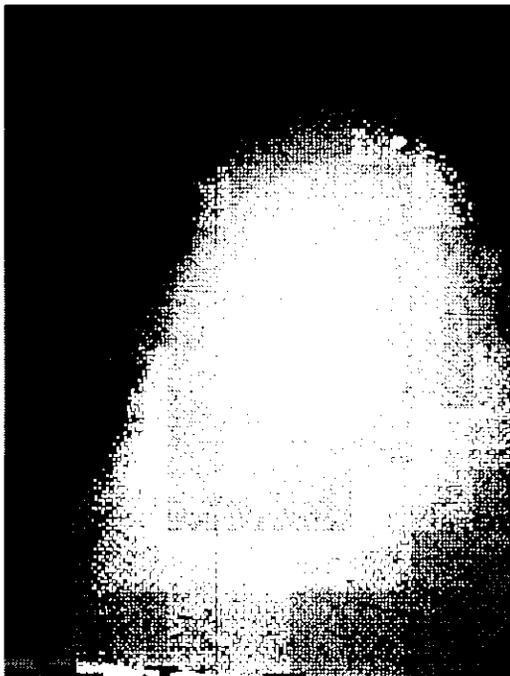
Louisville WWTP Bypass around Primary Clarifiers
2/1/2010



Bill Glick, Superintendent
City of Louisville
February 2, 2010
Page 6



Bill Glick, Superintendent
City of Louisville
February 2, 2010
Page 7



Bill Glick, Superintendent
 City of Louisville
 February 2, 2010
 Page 8

