

**Environmental
Protection Agency**

2011-07-26 10:00 AM Governor
2011-07-26 10:00 AM Lt. Governor
2011-07-26 10:00 AM Director

July 26, 2011

RE: COLUMBIANA COUNTY
CENTER TOWNSHIP
SALEM WATER PLANT
6343 GAMBLE ROAD
PERMIT # 3IV00180

Mr. Larry K. Sebrell
Plant Manager
Salem Water Treatment Plant
231 South Broadway
Salem, OH 44460

Dear Mr. Sebrell:

On June 22, 2011, this writer conducted an inspection of Salem Water Treatment Plant, located at 6343 Gamble Road, Center Township, Ohio. The purpose of the inspection was to review the water pollution control facilities and evaluate compliance with the facility's NPDES permit prior to drafting the renewal permit. The following was observed at the time of the inspection:

- 1) The facility appeared well maintained and well operated. A review of the last three years of monthly operating report data (January 2008 through June 2011) did not reveal any NPDES permit effluent violations. The operating data did reveal sampling for chlorine residual was not taking place during the winter. The City's permit requires this parameter to be sampled year round. All the sampling required by the permit must be completed. At the time of the inspection, all treatment processes appeared satisfactory.
- 2) During the inspection you questioned the need for dechlorination since the supernatant from the lagoons discharges back to the city's reservoir. Chapter 3745-1-07 of the Ohio Administrative Code (Water Quality Standards) defines permit limits for discharging to waters of the state. The Salem Reservoir is considered waters of the state. The current permit limit is based on this rule. There is also a concern for chlorine creating trihalomethanes within the reservoir; therefore, the current limit is appropriate.
- 3) The renewal of the existing permit was on hold while the City is attempting to resolve the legal issues at the wastewater treatment plant. The current administration has elected to move forward with the issuance of the new permit. The new permit will require the monitoring for sampling station 001 (final effluent) be done at the outfall pipe from the reservoir. This will give the Agency a better

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indication of what is actually discharging to Cold Run from the water plant. During dry periods when the reservoir does not discharge, the facility will report "no discharge" on the eDMR. Furthermore, an internal monitoring station will be created to continue monitoring chlorine residual at the current location. This is for the reasons stated above and at the request of the Division of Drinking Water.

- 4) The current permit required a sludge management plan be submitted by December 1, 2001. To date, this office has not received the sludge management plan. This is a significant violation of the existing NPDES permit. This office has chosen not to pursue action at this time, but a timely response to this letter is necessary and Ohio EPA reserves the right to take action at some future date, if uncorrected. The new permit will, again, have a schedule for the submittal of a Land Application Management Plan. However, this must be submitted within sixty days of the date of this letter.

The draft permit will be available for your review shortly.

Should you have any comments or concerns regarding this letter, please feel free to contact me at (330) 963-1193.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

cc: Don Weingart, City of Salem
Bob Henn, Ohio EPA, NEDO, DDAGW

File: Industrial/Permit Compliance/Salem Water Plant