



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 19, 2007

RE: HOLMES COUNTY  
WALNUT CREEK WWTP  
NPDES #3PH00058

Mr. Jerry Galbraith, Director  
Holmes County Environmental Management District  
2 Court Street  
Millersburg, OH 44654

Dear Mr. Galbraith:

On June 8, 2007, this office conducted a compliance evaluation inspection (CEI) of the Holmes County Walnut Creek Treatment Plant (WWTP). Present during the inspection were this writer and Keith Patterson, Holmes County Environmental Management District.

At the time of the inspection, the treatment system was producing a slightly turbid effluent that appeared to be of marginal quality.

One aeration tank blower has been down for repairs for approximately one and a half months. Upon speaking to Scott Watson, I was informed that the new blower will not be delivered until July 25<sup>th</sup>. One aeration tank and clarifier were septic due to the lack of oxygen. (See Figure 1)



Figure 1 – Septic aeration tank and clarifier.

During the inspection, I informed Mr. Patterson that he should eliminate any flow to this portion of the treatment system. Decant from the sludge holding tanks was being discharged to this aeration tank, which was causing untreated wastewater to leave the plant.

A bypass line has been installed to divert flow around the surface sand filters (See Figure 2). You are not permitted to bypass any portion of the treatment system. This line must be removed immediately. Please see Part III, item 11 (General Conditions) of your National Pollutant Discharge Elimination System (NPDES) permit.



Figure 2 – Bypass line around sand filters to disinfection tank.

As was noted in the last inspection letter from this office, spill containment is still not provided for the ferric chloride drums.

A review of the flow data for this facility revealed that this treatment plant is hydraulically overloaded. Included with this letter is a chart containing flow values for May 2006 through April 2007. The average daily flow for this time period was 126,770 gallons per day, well above the design flow of 90,000 gallons per day.

A review of your self-monitoring reports covering the period September 2005 through April 2007 revealed the following effluent violations:

**September 2005**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	2.3	mg/l	1.0
001	30 day	Phosphorus	1.33	kg/day	0.34
001	7 day	Phosphorus	2.3	mg/l	1.5
001	7 day	Phosphorus	1.33	kg/day	0.51

**October 2005**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	1.1	mg/l	1.0
001	30 day	Phosphorus	0.65	kg/day	0.34
001	7 day	Phosphorus	0.65	kg/day	0.51

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**November 2005**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	1.2	mg/l	1.0
001	30 day	Phosphorus	0.83	kg/day	0.34
001	7 day	Phosphorus	0.83	kg/day	0.51

**December 2005**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	1.1	mg/l	1.0
001	30 day	Phosphorus	0.708	kg/day	0.34
001	7 day	Phosphorus	0.708	kg/day	0.51

**January 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	7 day	Suspended solids	6.29	kg/day	6.1

**May 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	5.2	mg/l	1.0
001	30 day	Phosphorus	1.44	kg/day	0.34
001	7 day	Phosphorus	5.2	mg/l	1.5
001	7 day	Phosphorus	1.44	kg/day	0.51

**June 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	1.7	mg/l	1.0
001	30 day	Phosphorus	0.70	kg/day	0.34
001	7 day	Phosphorus	1.7	mg/l	1.5
001	7 day	Phosphorus	0.70	kg/day	0.51

**July 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	6	mg/l	1.0
001	30 day	Phosphorus	2.95	kg/day	0.34
001	7 day	Phosphorus	6	mg/l	1.5
001	7 day	Phosphorus	2.95	kg/day	0.51

**August 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	4.6	mg/l	1.0
001	30 day	Phosphorus	2.14	kg/day	0.34
001	7 day	Phosphorus	4.6	mg/l	1.5
001	7 day	Phosphorus	2.14	kg/day	0.51

**September 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	9.5	mg/l	1.0
001	30 day	Phosphorus	4.42	kg/day	0.34
001	7 day	Phosphorus	9.5	mg/l	1.5
001	7 day	Phosphorus	4.42	kg/day	0.51

**October 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	3.76	mg/l	1.0
001	30 day	Phosphorus	1.765	kg/day	0.34
001	7 day	Phosphorus	3.76	mg/l	1.5
001	7 day	Phosphorus	1.765	kg/day	0.51

**November 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	7.8	mg/l	1.0

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<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	3.51	kg/day	0.34
001	7 day	Phosphorus	7.8	mg/l	1.5
001	7 day	Phosphorus	3.51	kg/day	0.51

**December 2006**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	1.9	mg/l	1.0
001	30 day	Phosphorus	0.96	kg/day	0.34
001	7 day	Phosphorus	1.9	mg/l	1.5
001	7 day	Phosphorus	0.96	kg/day	0.51

**January 2007**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	0.392	kg/day	0.34

**February 2007**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	1.6	mg/l	1.0
001	30 day	Phosphorus	0.624	kg/day	0.34
001	7 day	Phosphorus	1.6	mg/l	1.5
001	7 day	Phosphorus	0.624	kg/day	0.51

**March 2007**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported Value</u>	<u>Units</u>	<u>Permit Limitation</u>
001	30 day	Phosphorus	1.2	mg/l	1.0
001	30 day	Phosphorus	0.527	kg/day	0.34
001	7 day	Phosphorus	0.527	kg/day	0.51

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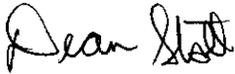
**April 2007**

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u> <u>Value</u>	<u>Units</u>	<u>Permit</u> <u>Limitation</u>
001	30 day	Phosphorus	2.1	mg/l	1.0
001	30 day	Phosphorus	1.32	kg/day	0.34
001	7 day	Phosphorus	2.1	mg/l	1.5
001	7 day	Phosphorus	1.32	kg/day	0.51

This treatment plant continues to be in noncompliance with the effluent limitations contained in the NPDES permit. This plant has experienced 58 numeric violations since September 2005. The number of NPDES permit violations is increasing. You are directed to submit to this office, in writing, within 30 days from the date of this letter, as to the measures that will be taken to bring this facility into compliance. Your report should include a schedule for the plant expansion and methods for controlling phosphorus.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1197.

Sincerely,



Dean W. Stoll, P.E.  
Environmental Engineer  
Division of Surface Water

DWS/mt

enclosure

cc: Scott Watson, Holmes County Environmental Management District

File: Public/Permit Compliance

# Walnut Creet WWTP

