



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Hardin County
Kenton WWTP
NPDES Permit

September 27, 2007

Mayor and Council
City of Kenton
Kenton Municipal Building
111 W. Franklin Street
P.O. Box 220
Kenton, Ohio 43326

Dear Mayor and Council:

On September 6, 2007, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the City of Kenton Wastewater Treatment Plant. Mr. Mike Heilman and Mr. Chet Baughman were present and provided information on operation and maintenance of the plant. The inspection included completion of the enclosed inspection checklist and a tour of the wastewater treatment plant.

During our visit, all major treatment units were in service. The final effluent discharging to the Scioto River was clear. However, no samples were collected to verify compliance with NPDES permit limits.

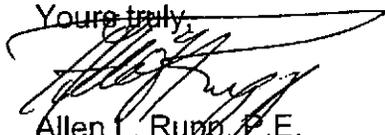
Suspended solids loading violations were reported in October 2006, December 2006, January 2007, and March 2007. Our review of your monthly operating reports indicates that the average daily flow from July 2006, to June 2007, was 3.1 million gallons per day (MGD) versus the average daily design flow of 2.4 MGD. We recommend that you conduct an evaluation of the plant capacity to determine whether an increase in design flow is appropriate. If an engineering report is submitted, with an NPDES Permit Modification Request and Antidegradation Addendum, which indicates that the plant can treat additional flow on a continuous basis without expansion, it may be possible to include pollutant loadings based on the new higher design flow in your permit. This would reduce or eliminate effluent loading violations and the potential of future enforcement action should the NPDES permit violations continue.

As discussed, please be aware that new Operator Certification rules outlined in Ohio Administrative Code (OAC) 3745-7 were issued on December 21, 2006. Staffing and certification levels outlined in the rules will become effective with any NPDES permit action, issued after December 2008.

Record keeping requirements and responsibilities of a certified operator (OAC 3745-7-09) must be followed immediately. Documentation of all operation and maintenance activities on the collection system and wastewater treatment plant must be developed and maintained. The required documentation includes, but is not limited to: dates and times of arrival and departure for the operator of record and preventative maintenance logs for all plant and collection system components. The records must be kept up to date, contain a minimum of three months data at all times, and be maintained on site for at least three years.

Operation and maintenance of the plant were satisfactory. A copy of our completed inspection report is enclosed for your records. If you have any questions, please call Tom Poffenbarger at (419) 373-3008.

Yours truly,



Allen L. Rupp, P.E.
District Engineer/Section Manager
Division of Surface Water

Enclosure

TP/llr

pc: Mr. Mike Heilman, Kenton WWTP w/enclosure
CDSW-NWDO File w/enclosure 1

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
<u>2PD00020</u>	<u>OH0025925</u>	<u>07/9/6</u>	<u>C</u>	<u>S</u>	<u>1</u>

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Kenton WWTP 230 Gilmore Road Kenton, Hardin County	10:30 A.M.	July 1, 2007
	Exit Time	Permit Expiration Date
	11:40 A.M.	July 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mr. Mike Heilman, Superintendent Mr. Chet Baughman, Operator	419-674-4303 419-674-4303

Name, Address and Title of Responsible Official	Phone Number
Mayor and Council, City of Kenton Kenton Municipal Building 111 W. Franklin Street, P.O. Box 220 Kenton, Ohio 43326	419-674-4850

Section C: Areas Evaluated During Inspection

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

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

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

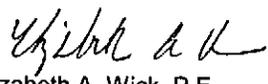
Discharge to Scioto River was clear.

Several suspended solids NPDES permit loading violations have been reported since our last inspection.

Average daily flow from July 2006 to June 2007 was 3.1 MGD versus the average daily design flow of 2.4 MGD.


9/12/07

_____, Ohio EPA, _____ Northwest
 Name(s) and Signature(s) of Inspector(s) Date District Office


9/20/07

_____, Ohio EPA, _____ Northwest
 Name and Signature of Reviewer Date District Office

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	<u>X</u>	___	___	___
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	<u>X</u>	___	___	___
(c) PRODUCT(S) AND PRODUCTION RATES CONFORM WITH PERMIT APPLICATION (INDUSTRIES)	___	___	<u>X</u>	___
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT PERMIT APPLICATION/BRIEFING MEMO	___	<u>X</u>	___	___
(e) TREAT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION/BRIEFING MEMO	<u>X</u>	___	___	___
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION	___	<u>X</u>	___	___
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES	___	___	<u>X</u>	___
(h) ALL DISCHARGES ARE PERMITTED	<u>X</u>	___	___	___
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT	<u>X</u>	___	___	___

COMMENTS/STATUS:

(d) Average flow was 3.1 MGD from July 2006 to June 2007.

Section F: Compliance Schedules/Violations

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE THE LAST INSPECTION	<u>X</u>	___	___	___
(b) PERMITTEE IS TAKING ACTIONS TO RESOLVE VIOLATIONS	___	<u>X</u>	___	___
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	___	<u>X</u>	___	___
(d) COMPLIANCE SCHEDULE CONTAINED IN NPDES Permit	___	___	___	___
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE	<u>X</u>	___	___	___

COMMENTS/STATUS:

(a) TSS (October 2006, December 2006, January 2007, March 2007)

(c) Mercury Variance

(e) Variance request or letter of compliance is due by January 2010.

Section G: Operation and Maintenance

TREATMENT WORKS:

	Yes	No	N/A	N/E
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED				
(a) STANDBY POWER AVAILABLE GENERATOR <u>X</u> DUAL FEED	<u>X</u>	---	---	---
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	<u>X</u>	---	---	---
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	<u>X</u>	---	---	---
(d) SUFFICIENT OPERATING STAFF PROVIDED # SHIFTS <u>1</u> DAYS/WEEK <u>5</u>	<u>X</u>	---	---	---
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS REQUIRED BY PERMIT CLASS: <u>IV</u>	<u>X</u>	---	---	---
(f) ROUTINE AND PREVENTIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME	<u>X</u>	---	---	---
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION	<u>X</u>	---	---	---
(h) OPERATION AND MAINTENANCE MANUAL PROVIDED AND MAINTAINED	<u>X</u>	---	---	---
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION	<u>X</u>	---	---	---
(j) REGULATORY AGENCY NOTIFIED OF BYPASSES <u>X</u> ON MORS <u>X</u> 800 NO.	<u>X</u>	---	---	---
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECTION	---	<u>X</u>	---	---

COMMENTS/STATUS:

- (d) 3 hour shifts on weekends and holidays
- (g) sampling pump in lab, digester blower, digester drive, channel monster
- (k) hydraulic during bypass events

COLLECTION SYSTEM:

	Yes	No	N/A	N/E
(a) PERCENT COMBINED SYSTEM <u><10</u> %				
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSO <u>SSO</u>)	---	<u>X</u>	---	---
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)	---	---	<u>X</u>	---
(d) CSO O AND M PLAN PROVIDED AND IMPLEMENTED	---	---	<u>X</u>	---
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT	---	---	<u>X</u>	---
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM	---	<u>X</u>	---	---
(g) LIFT STATION ALARM SYSTEMS PROVIDED AND MAINTAINED	<u>X</u>	---	---	---
(h) ARE LIFT STATIONS EQUIPPED WITH PERMANENT STANDBY POWER OR EQUIVALENT	---	<u>X</u>	---	---
(i) IS THERE AN INFLOW INFILTRATION PROBLEM (SEPARATE SEWER SYSTEM) OR WERE THERE ANY MAJOR REPAIRS TO COLLECTION SYSTEM SINCE LAST INSPECTION	---	<u>X</u>	---	---
(j) ANY COMPLAINTS RECEIVED SINCE LAST INSPECTION OF BASEMENT FLOODING	---	<u>X</u>	---	---
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	---	<u>X</u>	---	---

COMMENTS/STATUS:

- (g) Visual alarms are on lift stations.

Section H: Sludge Management

(a) SLUDGE MANAGEMENT PLAN (SMP)
SUBMITTED DATE _____ APPROVAL # _____ NOT SUBMITTED _____ N/A X

	Yes	No	N/A	N/E
(b) SLUDGE MANAGEMENT PLAN CURRENT	<u>X</u>	___	___	___
(c) SLUDGE ADEQUATELY DISPOSED (METHOD: Land Application)	<u>X</u>	___	___	___
(d) IF SLUDGE IS INCINERATED, WHERE IS ASH DISPOSED OF _____	___	___	___	___
(e) IS SLUDGE DISPOSAL CONTRACTED (NAME: _____)	___	<u>X</u>	___	___
(f) HAS AMOUNT OF SLUDGE GENERATED CHANGED SIGNIFICANTLY SINCE LAST INSPECTION	___	<u>X</u>	___	___
(g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT	<u>X</u>	___	___	___
(h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP	<u>X</u>	___	___	___
(i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW	<u>X</u>	___	___	___
(j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE	___	<u>X</u>	___	___
(k) IS SLUDGE ADEQUATELY PROCESSED (DIGESTION, DEWATERING, PATHOGEN CONTROL)	<u>X</u>	___	___	___

COMMENTS/STATUS:

(a) Sludge requirements are in NPDES permit

Section I: Self-Monitoring Program

Part 1. Flow measurement

	Yes	No	N/A	N/E
(a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED & MAINTAINED <u>X</u>	<u>X</u>	___	___	___
TYPE OF DEVICE: <u>X</u> ULTRASONIC & PARSHALL FLUME ___ ULTRASONIC & WEIR ___ WEIR ___ CALCULATED FROM INFLUENT ___ OTHER (Specify _____)				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration <u>6/7/07</u>)	<u>X</u>	___	___	___
(c) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED	<u>X</u>	___	___	___
(d) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOWS	<u>X</u>	___	___	___
(e) ACTUAL FLOW DISCHARGED IS MEASURED	<u>X</u>	___	___	___
(f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY: <u>X</u> DAILY ___ WEEKLY ___ MONTHLY ___ OTHER	___	___	___	___

COMMENTS/STATUS:

Section J: Effluent/Receiving Water Observations

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
001	none	none	none	none	none	clear	

COMMENTS/STATUS:

Section K: Multimedia Observations

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

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:

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	Break tank
	Safety Features	S	Fence surrounding plant
	Bypasses		
	Stormwater Overflows	OUT	Equalization (Storm Water) Tank
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	-	
	Pump Station	IN	4 Variable speed pumps
	Ventilation	S	
	Bar Screen	OUT	On Comminutor bypass
	Disposal of Screenings	S	Land fill
	Comminutor	IN	Muffin Monster
	Grit Chamber	IN	2 Aerated tanks
	Disposal of Grit	S	Land fill
	Screen Basket	IN	Cleaned weekly
Primary	Settling Tanks		
	Scum Removal		
	Sludge Removal		
	Effluent		
Sludge Disposal	Digesters	IN	2 units aerobic
	Temperature and pH		
	Gas Production		
	Heating Equipment		
	Sludge Pumps	IN	2 screw pumps, 2 positive displacement pumps
	Drying Beds		
	Storage Building	IN	Over 1 year storage
	Disposal of Sludge	S	Land application
	Gravity Thickener	IN	1 unit
	Belt Press	IN	Runs approximately 2 of every 6 weeks
Other	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
	Chemical Treatment		
Secondary-Tertiary	Oxidation Ditch	IN	
	Final Clarifiers	IN	2 units
Disinfection	Effluent	S	Clear
	Disinfection System	IN	Ultraviolet Disinfection
	Effective Dosage		
	Contact Time		
	Contact Tank		
	Dechlorination		
	Post Aeration	IN	