



State of Ohio Environmental Protection Agency

Southwest District Office

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Lee Fisher, Lieutenant Governor
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August 25, 2008

Mr. Robert Bender
City of New Carlisle
P.O. Box 419
New Carlisle, OH 45344

CERTIFIED LETTER

*1PD000018
Sh*

**RE: New Carlisle WWTP – NPDES No. 1PD00009*ND/OH0027421
Compliance Evaluation Inspection – Clark County**

Dear Mr. Bender:

On August 13, 2008, Sandra Leibfritz conducted an inspection at New Carlisle WWTP located at 403 Garfield Street, New Carlisle, Ohio. Steven Durall was representing the facility. There were two areas that were rated as marginal. All other areas that were evaluated were rated as satisfactory. For details on these rating, refer to the enclosed inspection report.

Ohio EPA acknowledges that New Carlisle has been under fiscal watch; however, New Carlisle must adequately staff, operate, and maintain the plant, as well as address issues with the sewer collection system. Due to significant increases for utilities over the past several years, Ohio EPA recommends that New Carlisle reevaluate their sewer rates. These rates are critical in the daily operations and maintenance of your plant and collection system.

There are 7 items requiring a response. No later than November 19, 2008, provide the corrective actions that have been taken for item numbers 2, 5, 6, and 7. No later than January 15, 2009, provide the corrective actions that have been taken for item numbers 1, 3, and 4. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Clark County Health Department
Steven Durall, WWTP Superintendent



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
1PD00018*FD	OH0020044	08/13/08	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of New Carlisle WWTP 403 Garfield Avenue New Carlisle, OH 45344-0419	9:00 a.m.	July 1, 2008
	Exit Time	Permit Expiration Date
	2:00 p.m.	June 30, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Steven Durall, WWTP Superintendent	(937) 845-0814 (937) 604-2101 (cell)	
Name, Address and Title of Responsible Official	Phone Number	
Robert Bender City of New Carlisle P.O. Box 419 313 S. Church Street New Carlisle, OH 45344-0419	(937) 845-9492 (937) 845-2338 (fax)	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	
Inspector	Reviewer
 Sandra D. Leibfritz Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 8/22/08	Date 8/25/08

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 Y
- (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:

(b) The final effluent discharges to Honey Creek.
 (d) The WWTP is designed to serve an average daily hydraulic flow of 1.0 MG. During the period from January 2007 through December 2007, the WWTP discharged an average daily flow of 0.71 MG.
 (e) The wet stream process consists of wet well with mechanical screen, influent pumping, aerated grit chamber, comminutor, (2) primary clarifiers, (2) oxidation towers, intermediate clarifier, (2) RBC trains (8 units total), (2) secondary clarifiers, flocculator clarifier, (3) rapid sand filters, chlorination/dechlorination with post aeration.

Section E: Permit Verification

- (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:

(a) Ohio EPA sent a Notice of Violation letter (dated July 24, 2008) to New Carlisle that listed 7 violations for CBOD₅. Mr. Durall reported that data for CBOD₅ and Fecal Coliforms were inadvertently switched. Mr. Durall reported that New Carlisle will be amending the DMRs to correct the data.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator 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..... N
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... III
- (e) Operator of Record holds an unexpired license of class required by Permit - Class: III..... Y
- (f) Copy of certificate of Operator Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance schedule/performed on time..... Y
- (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
 Notified Inspector and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Comments/Status:

(a) The generator is started every couple of months. The generator operates all equipment associated with flow except the mechanism on the flocculator clarifier.

(c) The rapid sand filters are being bypassed due to one of the backwash pumps in need of repair. One of the secondary clarifiers is off-line due to a corroded skimmer box. Repairs to the clarifier should be completed by the end of summer. A new sludge pump has been installed and the other sludge pump was repaired.

(e) New Carlisle employs four Class III operators.

(i) See comment "c."

(j) The O&M manual (dated 1991) needs to be updated.

(k) There is a bypass around the primary and part of the secondary treatment systems (bypass goes around the ammonia towers, RBCs and two of the secondary clarifiers). The bypass is located in the splitter box prior to the primary clarifiers. The bypass goes directly to the flocculator clarifier. A steel plate was placed over the bypass pipe in April 2008.

Section G: Operation & Maintenance (con't)

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

Permit # : 1PD00018*FD
 NPDES #: OH0020044

- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power or equivalent..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding Y
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

Mr. Duvall is responsible for the collection system.

(g) There are 4 lift stations operated and maintained by New Carlisle as follows: (1) North Hampton (owned by North Hampton), (2) Home Creek Village MHP, (3) New Carlisle Cemetery and (4) State Route 571. All are equipped with two pumps. All pumps and alarm system were reported as operational. There are generators located at North Hampton's and Home Creek Village's lift station. A portable generator is available for use at the lift stations for New Carlisle Cemetery and State Route 571.

(i) In town, there are minimal I/I issues. There are significant I/I issues regarding Chateau Estates MHP, Brookwood MHP, Park Terrace MHP, Country Squire MHP and Honey Creek MHP.

(j) There was one report of "WIB." There were roots in the main lined that caused sewage to begin backing up into a house located at 501 South Main Street, New Carlisle.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
 Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/E
- (c) Sludge adequately disposed..... N/E
 (Method:)
- (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..... N/E
- (i) Records kept in accordance with State and Federal law..... N/E
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... N/E

Comments/Status:

The solid stream process consists of sludge thickening tank, aerobic digester and drying beds. Land application is by liquid sludge at agronomic rates. For 2007, the Annual Sewage Sludge Report reported that 89.46 dry tons of Class B sewage sludge was land applied.

(e) The City of New Carlisle hauls and land applies liquid sludge to Studebaker Nursery and a farm located on New Carlisle Pike.

(g) The City of New Carlisle reported that there is 220 days of storage for sewage sludge available at the WWTP.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
 Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
 Calculated from influent Other
- (b) Calibration frequency adequate Y
 (Date of last calibration: May 14, 2008)
- (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
 Daily Weekly monthly other

Comments/Status:

(a) Flow is monitored at the influent via a mag meter.
 (b) ABB calibrates the meter 6 times a year.
 (c) Charts are kept greater than 5 years.
 (d) The mag meter is capable of handling 0 to 3.3 MG.
 (e) See item "a."

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/E
- (d) Sample collection procedures are adequate..... N/E
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... N/E
 - (iii) Containers and sample holding times prior to analysis
 conform with 40 CFR 136.3..... N/E
- (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)..... N/E
- (f) Adequate records maintained of sampling date, time, location, etc.. N/E

Comments/Status:

Section I: Self-Monitoring Program (con't)

Laboratory:

General

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

Lab name:
 Lab name:

Quality Control/Quality Assurance

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

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	None	None	Clear	None

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (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:

FINAL EFFLUENT VIOLATIONS – OUTFALL 001*

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2007	Chlorine, Total Residual	1D Conc	0.038	.39	6/28/2007
September 2007	Nitrogen, Ammonia (NH3)	7D Conc	3.0	4.93533	9/15/2007
September 2007	Nitrogen, Ammonia (NH3)	7D Qty	11.4	12.2155	9/15/2007

* Violations noted are during the period from May 2007 through 2008.

Items Requiring a Response:

1. The 1991 O&M manual requires 6 staff to operate and maintain the WWTP. Due to automation at the WWTP, this number has been reduced to 5. Ohio EPA does not object to the reduction of one staff position based on automation; however, there has only been 4 staff operating and maintaining the WWTP since September 2005. What is the time-line for properly staffing the WWTP. As an alternative, an evaluation of staffing levels must be completed that includes all aspects of operations, maintenance, laboratory practices and procedures, and process/quality control. This issue remains from the previous inspection letter dated May 22, 2007. No later than January 15, 2009 provide written notice to this office regarding the actions that have been taken to resolve this issue.

2. New Carlisle reported one "WIB" as required by Part II, Item Y (Sanitary Sewer Overflow Reporting) of your NPDES permit. The WIB was due to New Carlisle's sanitary sewer being clogged with roots. What actions have been taken and/or will be taken at 501 South Main Street? For example: Is New Carlisle going to increase maintenance of this line? If so, what is the maintenance schedule? Is New Carlisle going to repair or replace (slip line etc.) the line? Will New Carlisle install a check valve on line? No later than November 19, 2008, provide written notification on the actions that have been taken to resolve this issue.
3. The 1991 O&M manual needs to be updated. This item is remaining from the previous inspection letters dated June 22, 2006 and May 22, 2007. No later than January 15, 2009, provide written notification that New Carlisle's O&M manual has been updated to reflect current operations, maintenance and staffing levels.
4. New Carlisle was required to install a final effluent flow metering device. No later than January 15, 2009 submit a Permit-to-Install application and detail plans for the installation of a flow metering device for final effluent. This issue remains from the previous inspection letters dated June 22, 2006 and May 22, 2007.
5. New Carlisle is required to obtain coverage under the Industrial General Storm Water or apply for a "No Exposure Certificate" for exclusion from the general permit. Ohio EPA could find no record that New Carlisle had applied for coverage under the general permit or obtained a "No Exposure Certificate." Immediately submit a copy of your Letter of Authorization for coverage under the general permit or provide a copy of your No Exposure Certificate. If New Carlisle is unable to provide a copy of one of these documents, then New Carlisle must apply for coverage of the general permit by submitting a Notice of Intent or New Carlisle must request an exclusion of the general permit by submitting a No Exposure Certificate. New Carlisle must determine which action they are eligible for. Additional information was provided to Mr. Durall via e-mail. No later than November 19, 2008, provide a copy of the requested documentation to resolve this issue.
6. One of the rapid sand filters is out-of-service due to an inoperable backwash pump. Other items scheduled for purchase or repair on the filter is an electronic adder and influent pump repair. No later than November 19, 2008, provide a timeline for actions that will be taken to return the filter to operational status.
7. In general, guardrails throughout the plant are designed to protect employees from falls. Corrosion tends to compromise the integrity of these guardrails. The guardrails to the sludge thickener are corroded and in need of painting for the safety of your employees. No later than November 19, 2008, provide written documentation on the actions taken to resolve this issue.

Items Not Requiring a Response:

Mr. Durall reported that the bypass has been eliminated by placing a steel plate over the pipe in April 2008. As discussed during the inspection, any bypass of treatment is a violation of Part III, Item 11 (Unauthorized Discharge). Any bypass that does occur must be reported and monitored in accordance with Part II, Item 12 (Noncompliance Notification) of your NPDES permit.

Due to one of the rapid sand filters and one of the secondary clarifiers being out-of-service and the Operations and Maintenance Manual needs to be updated, the Operation & Maintenance Area was rated as marginal.

For failure to install a flow metering device, the Flow Measurement Area was rated as marginal.

The population of New Carlisle has decreased from 6,707 in the 1980's to 5,735 in 2000.

The plant is checked daily during holidays and weekends for 2 to 3 hours. Normal working hours are from 7:00 a.m. to 7:00 p.m.

There are two pumps in the influent pump stations. Both pumps are rated at 3.3 MGD and reported as operational. Pumps are designed as either lead or lag and are manually alternated. There is a visual alarm system with an autodialer.

The influent sampler is out-of-service. Three grab samples are collected in a single container to comply with the monitoring requirement for composite samples.

The grit pumps are alternated manually.

Screens are operated every 15 minutes (3/4" bar screen).

Grit and screenings are placed in a dumpster with ultimate disposal at landfill. New Carlisle currently used Allied Waste Services.

All floor drains are diverted to the head of the plant.

The comminutor was operating. There is a bar rack adjacent to the comminutor if it becomes necessary to bypass the comminutor.

There was a buildup of grease in the splitter box. The splitter box is cleaned every couple of years.

Gassing was observed in the primary clarifiers. Bulking solids that were brown to black in color were observed on the surface. Plastic debris was observed on the weirs.

Permit # : 1PD00018*FD
NPDES #: OH0020044

The biotowers has media that is 21 feet in depth and 35 foot in diameter. When the wind increases and the temperature drops below 0 °F, the surface of the media freezes. There are three submersible pumps in the biotowers lift station. One pump is in the shop for repair.

The City is investigating the use of launder covers for the intermediate clarifier to control stringy algae.

The effluent from the RBCs was clear with a small amount of pin floc. There is approximately 100,000 sq. ft of media on one train and approximately 150,000 sq. ft on the other train.

One of the secondary clarifiers is out-of-service. Once this unit is fixed and put back-in-service, than the other clarifier will be drained for maintenance.

There was stringy algae on the weirs and duckweed on the surface of the flocculator clarifier. Weirs are cleaned once every couple of months.

The rapid sand filters are being bypassed due to a backwash pump being out-of-service.

Disinfection was occurring on the final effluent. Chlorine gas is used to disinfect and sulfur dioxide is used to dechlorinate.

The final effluent was clear and odor free. The receiving stream, Honey Creek, was similar both upstream and downstream of the outfall 1PD00018001.

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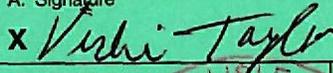
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