



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

October 29, 2008

Re: Adams County
Village of West Union
Compliance Evaluation Inspection
Ohio EPA Permit No. OPC00019*ED
NPDES Permit No. OH0028088
Correspondence (PWW)

Mayor and Council
Village of West Union
P.O. Box 578
West Union, Ohio 45693

Dear Mayor and Council:

On Thursday, October 16, 2008, Abbot Stevenson and I conducted a compliance evaluation inspection at the West Union Waste Water Treatment Plant (WWTP). Richard Potter represented West Union and assisted us during the inspection. Doug Cade (E. L. Robinson) was also present as the consultant for the village. The purpose of the inspection was to determine if the treatment plant was meeting the terms and conditions set forth in its NPDES permit.

The following were concerns that arose during the inspection.

1. At the time of the inspection, the grit removal unit was out of service. According to Mr. Potter, the grit removal unit had been inoperable for some time and the village was working with Mr. Cade to determine if an upgrade to the grit removal unit was necessary and/or feasible. Part III, Item 3, sub-item A, states the permittee shall, at all times, maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems required to achieve compliance with the permit. In your response to this letter, please indicate what steps the village plans to either return the existing grit removal unit to operation or commence with an upgrade to the existing grit removal unit. Please be aware that if the village chooses to begin work on an upgrade to the grit removal unit at the WWTP, steps must be taken to ensure adequate grit removal in the interim between now and operation of the new grit removal unit.
2. The influent flow meter had been replaced and was operational at the time of the inspection. However, after speaking with Mr. Potter, it was discovered that the new flow meter could only record flows up to 2 million gallons per day (MGD). It is known that the influent flow exceeds 2 MGD during moderately severe rainfall events. The flow meters at the WWTP should be capable of accurately recording

the full expected range of flows experienced at the WWTP. During the inspection, I indicated to Mr. Potter that the village should contact the manufacturer to recalibrate the existing flow meter to handle a wider range of flows. If that is not possible, a new flow meter may need to be purchased and installed.

3. At the time of the inspection, the effluent flow meter was still not properly calibrated. The proper calibration of this flow meter is paramount to the accurate collection of the 24-hour composite sample, as the automatic sampler is set to collect flow proportionate samples based on the effluent flow meter reading. Accurate discharge flow metering is also required to calculate pollutant loading in the discharge. Part III, Item 5 of the NPDES Permit requires samples and measurements taken to be representative of the volume and nature of the monitored flow. If the flow is not accurately monitored, the samples are inherently **not** representative discharge. The village must have the effluent flow meter properly calibrated to ensure proper effluent samples are collected. If a calibration cannot be performed, the village may need to replace the effluent flow meter with a model that is less complicated to maintain.

A copy of our inspection form is enclosed with this letter. Please submit a written response to the aforementioned comments within thirty (30) days of receipt of this letter. If you have any questions or comments, please contact me at (740) 380-5226.

Sincerely,



Patrick Hudnall
District Representative
Division of Surface Water

PH/dh

Enclosure

c: Richard Potter

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PC00019*ED	OH0028088	October 16, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
West Union WWTP 6875 S.R. 278 West Union, Ohio 45693	12:00 p.m.	September 1, 2006
	Exit Time	Permit Expiration Date
	1:30 p.m.	August 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Richard Potter, Operator	(937) 544-5217
Name, Address and Title of Responsible Official	Phone Number
Village of West Union P.O. Box 578 West Union, Ohio 45693	(937) 544-5217

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>U</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>S</u> Compliance Schedules
<u>M</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> </u> Other
<u>U</u> Collection System		

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

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

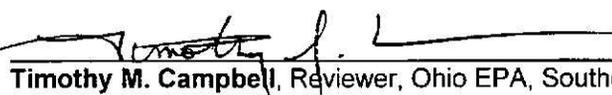
Please see attached inspection letter.



 Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

10/29/08

 Date



 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

10/30/08

 Date

E. PERMIT VERIFICATION

Inspection Observations, Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection		X		
b. Permittee is taking actions to resolve violations			X	
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in: <u>0PC00019*FD</u>	X			
e. Permittee is meeting compliance schedule	X			

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed _____	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units		X		
d. Sufficient operating staff provided: # of shifts <u>1</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: <u>III</u>	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection	X			
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

Comments: c. Grit removal unit was not operating.
 g. Grit removal unit was not operating.
 k. Severe I/I flow experienced at the WWTP.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0%</u>				
b. Any collection system overflows since last inspection (CSO <u> </u> SSO <u>1</u>)	X			
c. Regulatory agency notified of overflow (SSOs)	X			
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system		X		
g. Lift station alarm systems provided and maintained	X			
h. Are lift stations equipped with permanent standby power or equivalent		X		
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	X			
j. Any complaints received since last inspection of basement flooding		X		
k. Are any portions of the sewer system at or near capacity		X		

Comments: h. Copeland station has generator, others have no standby power. Village must rent pumps/generators if lift stations malfunction.

H. SLUDGE MANAGEMENT

	Yes	No	N/A	N/E
c. Sludge adequately disposed (Method: <u>Landfill</u>)	X			
d. If sludge is incinerated, where is ash disposed of? <u> </u>		X		
e. Is sludge disposal contracted (Name: <u>Pike Sanitation</u>)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained	X			
g.	Satisfactory calibration and maintenance of instruments and equipment	X			
h.	Adequate records maintained	X			
i. Results of latest U.S. EPA quality assurance performance sampling program:					
Date: <u> N/A </u> <u> </u> Satisfactory					
<u> </u> Marginal					
<u> </u> Unsatisfactory					

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	None	

Comments:

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		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
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: