



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

May 7, 2008

Re: Adams County
Village of West Union
Compliance Evaluation Inspection
Ohio EPA Permit No. 0PC00019*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, April 24, 2008, I conducted a compliance evaluation inspection at the West Union Waste Water Treatment Plant (WWTP). Duane Kirk represented West Union and assisted me during the inspection. 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 my inspection, the influent flow meter was not operating. Duane stated that the flow meter stopped working on April 20, 2008 and he had notified Mr. Potter of the problem. He also indicated that Mr. Potter had told him that he had arranged for the repair of the unit in the near future. The village must immediately take action to return the influent flow meter to working order.
2. Duane stated that recent high flows, due to Inflow/Infiltration (I/I), had rendered the cyclone degrit unit inoperable and resulted in a significant amount of grit to get through into the plant. If you recall, the recent rehabilitation of the digester resulted from years of poor maintenance coupled with significant amounts of grit bypassing the degrit unit and accumulating in the digester. I encourage West Union to investigate the effectiveness of the current degrit system at the WWTP, along with sources of I/I in the collection system. Better removal of grit from the influent wastewater could help prevent the recurrence of the digester problems in the future and better plant operation.
3. As mentioned in the above comment, I/I appears to be a significant issue at the West Union WWTP. The recent spike in influent flow rate, during a rain event, from ~200,000 gallons per day to ~1,880,000 gallons per day is an example of severe I/I flows experienced at the WWTP. For reference, the WWTP has a design treatment capacity of 600,000 gallons per day. The current NPDES

Permit contains a compliance schedule requiring the village to submit quarterly progress reports detailing the I/I removal efforts undertaken by the village. In compliance with this requirement, I routinely receive the progress reports from the village, however, they consistently explain that no I/I removal efforts have been undertaken during each of the respective quarters. Consistent and effective efforts to identify and remove sources of I/I from the West Union sewerage collection system must be made. Enforcement action will be recommended if there are ongoing effluent limit violations as a result of the unabated I/I.

4. The stairs leading down to the final effluent sampling station were in a state of disrepair and unsafe for WWTP staff to use. The stairs should be repaired as soon as possible to ensure the safety of your staff and adequate access to the final effluent.
5. We have received your self-monitoring reports covering the months of January 2007 to March 2008 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance and/or deficiencies are as follows:

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2007:					
001	CBOD 5 day	30D Qty	22.8	23.3	2/1/2007
001	Total Suspended Solids	7D Qty	40.9	46	2/15/2007
001	CBOD 5 day	7D Qty	34.1	43.1	2/15/2007
September 2007:					
001	Fecal Coliform	7D Conc	2000	2176	9/15/2007
December 2007:					
001	Total Suspended Solids	7D Qty	40.9	62.5	12/8/2007
January 2008:					
001	Total Suspended Solids	7D Qty	40.9	76.6	1/8/2008
February 2008:					
001	Total Suspended Solids	7D Conc	18	29.25	2/1/2008
001	Total Suspended Solids	30D Qty	27.3	48.9	2/1/2008
001	Total Suspended Solids	7D Qty	40.9	149.6	2/1/2008
March 2008:					
001	Total Suspended Solids	30D Qty	27.3	49.8	3/1/2008
001	CBOD 5 day	30D Qty	22.8	25	3/1/2008
001	Total Suspended Solids	7D Qty	40.9	97	3/15/2008
001	CBOD 5 day	7D Qty	34.1	39.2	3/15/2008

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

In your response to this letter, please provide an explanation of each of the above referenced violations as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

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	April 24, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
West Union WWTP 6875 S.R. 247 S. West Union, Ohio 45693	1:00 p.m.	September 1, 2006
	Exit Time	Permit Expiration Date
	2:00 p.m.	August 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Duane Kirk, Operator	(937) 544-3734
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council Village of West Union P.O. Box 578 West Union, Ohio 45693	(937) 544-5217

C. AREAS EVALUATED DURING INSPECTION

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Permit | <input type="checkbox"/> Flow Measurement | <input type="checkbox"/> Pretreatment |
| <input checked="" type="checkbox"/> Records/Reports | <input checked="" type="checkbox"/> Laboratory | <input type="checkbox"/> Compliance Schedules |
| <input checked="" type="checkbox"/> Operations & Maintenance | <input checked="" type="checkbox"/> Effluent/Receiving Waters | <input checked="" type="checkbox"/> Self-Monitoring Program |
| <input type="checkbox"/> M Facility Site Review | <input checked="" type="checkbox"/> Sludge Storage/Disposal | <input type="checkbox"/> Other |
| <input type="checkbox"/> U Collection System | | |

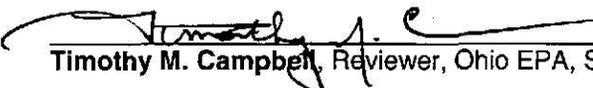
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached inspection letter.


 Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

5/8/08
 Date


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

5/8/08
 Date