



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

November 7, 2008

Re: Athens County
City of Athens
Compliance Evaluation Inspection
NPDES Permit 0PD00000*GD
Correspondence (PWW)

Mayor and Council
City of Athens
8 East Washington Street
Athens, Ohio 45701

Dear Mayor and Council:

On October 21, 2008, Tim Campbell and I conducted a Compliance Evaluation Inspection at the City of Athens wastewater treatment plant (WWTP). Mr. Jeff Arnold, Plant Supervisor, Mr. Joe Cantor represented the City of Athens and accompanied us during the inspection. The purpose of the inspection was to evaluate the status of the City's compliance with the terms and conditions set in the current National Pollutant Discharge Elimination System (NPDES) Permit.

The following observations were made during the inspection.

1. Prior to the inspection, this office had received several complaints of a strong odors alleged to be coming from the Athens WWTP. Several times prior to the inspection and during the inspection, we discussed the possible causes of the odors. Mr. Arnold thought a portion or the entire odor may be coming from the collection system running along the bike path adjacent to the WWTP. However, a strong odor was noticeable around the primary clarifiers at the WWTP during the inspection.

While the Ohio EPA understands that odors are unavoidable when providing treatment to sanitary wastewater, the odors noticed around the primary clarifiers seemed to be stronger than normal. It is possible that some minor operational changes may reduce the odor from the primary clarifiers. In order to assist Mr. Arnold and the WWTP staff with identifying what changes, if any, will reduce the odor, please consider contacting Keith Kroeger (614-863-8778) or Jon VanDommelen (614-644-2011) with our Office of Compliance Assistance. Keith and Jon provide free expert technical assistance to WWTP across the state.

2. At the time of the inspection, the scum removal troughs for the primary clarifiers were inoperable. Mr. Arnold indicated that they had been that way for some time. The 10 States Standards requires that provisions to remove scum from the

wastewater treatment process and direct it to the sludge treatment process shall be provided. Also, Part III, Item 3, sub-item A states "the permittee shall...maintain in good working order...all treatment or control facilities..." In order to comply with your NPDES Permit, the City of Athens must repair the scum removal troughs in the primary clarifiers.

3. At the time of the inspection, the weir plates in both the primary and secondary clarifiers were greatly deteriorated, causing inconsistent flow over, and, in some cases, under the weirs. Again, Part III, Item 3, sub-item A states "the permittee shall...maintain in good working order...all treatment or control facilities..." The City of Athens must replace the deteriorated weir plates in both the primary and secondary clarifiers in order to comply with the NPDES Permit.
4. At the time of the inspection, two of the four secondary clarifiers were not in operation. Mr. Arnold indicated that the two clarifiers were not operating because the wastewater flows were low enough as to only require the use of two secondary clarifiers. The 10 States Standards, Chapter 70, sets a maximum surface overflow rate of 1200 gpd/ft² and a maximum weir loading rate of 30,000gpd/lin ft for secondary clarifiers used in treatment systems such as the one operated by the City of Athens. In your response to this letter, please provide mathematical verification that these maximum design criteria are not being exceeded in the secondary clarifiers. This verification should use average flows recorded from the period(s) in question and accurate dimensions of the secondary clarifiers.

A copy of my Compliance Evaluation Inspection report is enclosed. The assistance and cooperation received during the inspection was greatly appreciated. Should you have any further questions, please contact me at (740) 380-5226.

Sincerely,



Patrick Hudnall
District Representative
Division of Surface Water

PH/dh

Enclosure

- c: Jeff Arnold, City of Athens WWTP
- c: Nick Carr, Utilities Director, City of Athens
- c: Ray Hazlett, Service-Safety Director, City of Athens

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00000*GD	OH0023388	October 21, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Athens WWTP 557 East State Street Athens, Ohio 45701	9:30 a.m.	December 1, 2002
	Exit Time	Permit Expiration Date
	11:45 a.m.	July 31, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jeff Arnold, Plant Supervisor	(740) 592-3346
Joe Cantor, Laboratory	(740) 593-3502
Scott Lambert, Sewer Supervisor	(740) 593-7636
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council City of Athens 8 East Washington Street Athens, Ohio 45701	(740) 592-3338

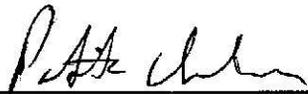
C. AREAS EVALUATED DURING INSPECTION

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

11/6/08

Date



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

11/6/08

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: _____			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: No. of shifts: <u> 3 </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 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

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		

Comments: