



State of Ohio Environmental Protection Agency

Southeast District Office

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

May 2, 2008

**Re: Athens County
City of Nelsonville
Water Treatment Plant
Correspondence (IWW)**

Mr. Joe Scherer, City Manager
City of Nelsonville
211 Lake Hope Drive
Nelsonville, Ohio 45764

Dear Mr. Scherer:

On April 29, 2008, I conducted a Compliance Evaluation Inspection (CEI) of the Nelsonville Water Treatment Plant (WTP). Bruce Stumbo accompanied me during the inspection and represented the City of Nelsonville. The purpose of the inspection was to determine if the City of Nelsonville was in compliance with the terms and conditions set forth in the National Pollutant Discharge Elimination System (NPDES) Permit.

The following are concerns which arose during the inspection.

1. A significant amount of lime sludge had accumulated in the southern lagoon. Bruce explained that the build-up of excess lime sludge was a result of the recent caustic spill in the WTP clear well. In order to contain the affected water, the discharge line from the lagoons was plugged and the caustic water temporarily stored in the lagoons. Meanwhile, lime sludge was still being applied to the lagoons, resulting in the accumulation.

Bruce stated that sludge removal has begun. Please continue with the removal until the lagoons reach a normal operating level.

2. The sludge level in the rapid sand filter backwash clarifier was visible and appeared to be higher than recommended. Once the lime sludge level has been lowered in the lagoons, sludge should be drawn out of the backwash clarifier to provide adequate settling capacity.
3. During a records review conducted prior to the inspection, it came to our attention that the City of Nelsonville has failed to submit Monthly Operating Reports, as required by the NPDES Permit, for the following periods: May 2000 to March 2003, July 2003 to December 2005, February 2006, and April 2006 to

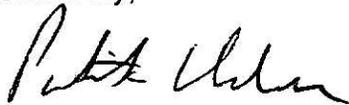
March 2008. When asked, Bruce stated that the samples were never taken for the missing reports, and could give no acceptable reason for the lack of sample collection and reporting. The City of Nelsonville must immediately begin sampling and reporting in accordance with the Nelsonville WTP NPDES Permit.

4. The records review also indicated the NPDES Permit issued to the Nelsonville WTP is going to expire on June 30, 2008. The NPDES Permit requires, under state and federal law, that a renewal application must be received at least 180 days prior to the expiration date. The City of Nelsonville must immediately prepare and submit an NPDES renewal application for the Nelsonville WTP.

In a correspondence from the Ohio EPA dated July 31, 2002 and again in a later correspondence dated February 21, 2003 the City of Nelsonville was noticed about missing MORs and NPDES renewal application. Due to the extensive history of noncompliance and previous notices issued to the City of Nelsonville, this office is recommending formal enforcement against the City of Nelsonville for NPDES Permit violations.

A copy of the inspection report is enclosed with this letter. Please respond, in writing, to the four comments above within thirty (30) days of receiving this letter. Should you have any questions, please feel free to contact me at (740) 380-5226.

Sincerely,



Patrick Hudnall
District Representative
Division of Surface Water

PH/dh

Enclosure

c: Bruce Stumbo, WTP Operator
c: Rex Haggy, DDAGW, SEDO

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIW00082	OH0041904	April 29, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Nelsonville WTP 749 Lake Hope Drive Nelsonville, Ohio 45764	10:15 AM	July 1, 2003
	Exit Time	Permit Expiration Date
	10:45 AM	June 30, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Bruce Stumbo, Operator	740-753-3405
Name, Address and Title of Responsible Official	Phone Number
Joe Scherer, City Manager City of Nelsonville 211 Lake Hope Drive Nelsonville, Ohio 45764	740-753-1314

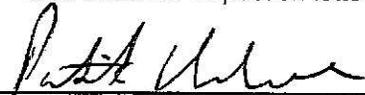
C. AREAS EVALUATED DURING INSPECTION

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

5/2/08
Date


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

5/2/08
Date