



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 9, 2008

Re: Belmont County
Barnesville WWTP
Ohio EPA Permit #0PC00001*GD
NPDES Permit #OH0024015
Correspondence (PWW/Major)

Mayor and Council
Village of Barnesville
132 N. Arch Street
Barnesville, Ohio 43713

Dear Mayor and Council Members:

On January 17, 2008, Tim Campbell, Jacob Howdyshell and I conducted a Compliance Evaluation Inspection (CEI) at the Village of Barnesville's wastewater treatment plant (WWTP). Gary Billman, WWTP Superintendent, and Roger Deal, Village Administrator, represented the village in a meeting after the plant inspection. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, federal number OH0024015, state number 0PC00001*GD. Wastewater samples were not taken. A copy of the inspection report form is attached.

Based on the inspection and file review, the facility was found to be in non-compliance with the permit on the day of the inspection, due to items listed below. The following comments/problems were noted as a result of the inspection:

1. **Self monitoring** – on the day of the inspection, the sampler was not operable. It appeared that it had not been used for quite some time and according to the operator the sampler has been out of service for at least 1 year. Failure to collect 24 hour flow proportionate samples is a violation of the permit. The village must take immediate actions to return to compliance by placing the sampler back into service or by manually collecting the samples over the 24 hour sampling period.
2. **Operation and Maintenance**
 - a. The rotors on the oxidation ditch are missing many of the paddles used to aerate the wastewater. These need to be replaced. Provide a date by when this work will be completed.

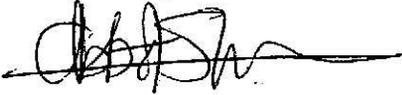
- b. At the time of the inspection, the facility had a high inventory of sludge. Barnesville has since contracted out the removal of the sludge backlog. The operator and the village must take the appropriate actions to remove sludge from the process on a regular basis.
3. **Sludge Storage/Disposal Compliance Schedule** – Barnesville is not in compliance with the pathogen reduction and vector attraction requirements of the sludge rules. Barnesville has a compliance schedule for evaluating and attaining compliance with OEPA's sludge regulations. Although Barnesville has made progress by hiring a consultant and evaluating the options, there have been on-going discussions regarding the best solution to this problem for Barnesville. Barnesville must continue to work towards a long term solution to the sludge processing problem.

Barnesville must stop land applying sludge until the sludge complies with the pathogen and vector attraction requirements of the sludge rules. As a short term solution, until a permanent solution is made, Barnesville can utilize a contractor to dewater and landfill the sludge. This would return Barnesville to compliance with the sludge regulations in the meantime. In order for Barnesville to be considered in compliance, Ohio EPA must receive a copy of the signed long term sludge hauling contract.
4. **Flow Measurement** – at the time of the inspection, the flow meter had not been calibrated in quite some time. It is recommended that this be done annually. Provide a date by when the meter will be calibrated.
5. Provide the results of your latest DMRQA laboratory quality control/quality assurance test. Was your lab rated acceptable? If not, provide an explanation.
6. The NPDES permit renewal has been drafted and will be issued draft in the near future. Please make sure that you review and comment on the draft within the 30 day comment period. One of the items of interest is that the collection system will be required to be supervised by a wastewater collection system II certified operator.

Barnesville WWTP
Page 3

Please respond to comments 1 through 6 above, in writing, within 20 days of receipt of this notice. If you have any questions, please contact me at (740) 380-5284.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

- c: Roger Deal, Village of Barnesville Administrator (w/enclosure)
- c: Gary Billman, Plant Supt., Village of Barnesville WWTP (w/enclosure)
- c: AS file

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PC00001*GD	OH0024015	January 17, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Barnesville Wastewater Treatment Plant County Road 122 and Township Road 27 Barnesville, Ohio 43713	9:30 a.m.	July 1, 2003
	Exit Time	Permit Expiration Date
	1:30 p.m.	July 1, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Gary Billman, WWTP Supt.	(740) 425-1681 or 3079
Name, Address and Title of Responsible Official	Phone Number
Mayor Tom Michelli and Council Members Village of Barnesville 132 Arch Street Barnesville, Ohio 43713	(740) 425-3444

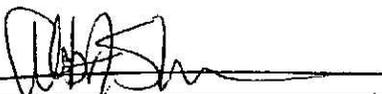
C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached letter.


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

5/9/08
Date


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

5/9/08
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>the NPDES permit</u>				
e. Permittee is meeting compliance schedule		X		

Comments: Schedule requires compliance with the sludge regulations.

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>5 (+2 hrs S&S)</u>				
e. Operator holds unexpired license of class required by permit Class: <u>II</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				
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: a. Portable, runs whole plant.
 f. Replace rotor paddles.
 h. No ability to bypass other than Imhoff tanks. No bypass.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: _____%				
b. Any collection system overflows since last inspection (CSO _____ SSO _____)				
c. Regulatory agency notified of overflow (SSOs)				
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				
g. Lift station alarm systems provided and maintained				
h. Are lift stations equipped with permanent standby power or equivalent				
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection				
j. Any complaints received since last inspection of basement flooding				
k. Are any portions of the sewer system at or near capacity				

Comments:

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: <u>land application</u>)		X		
d. If sludge is incinerated, where is ash disposed of? _____				
e. Is sludge disposal contracted (Name: <u>Agrisludge</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:

1. Barnesville's sludge does not meet the vector attraction or pathogen reduction requirements. No land application may be performed until it does. In the meantime, sludge will be landfilled.
2. Amount of sludge disposed has dropped from about 90 tons 10 years ago to 44 tons last year.
3. A complete sludge compliance inspection was conducted this day by Jacob Howdysshell, Ohio EPA Central Office. See his inspection report for details.

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				
i. Results of latest U.S. EPA quality assurance performance sampling program: Date: <u>2007</u> <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Marginal <input type="checkbox"/> Unsatisfactory					

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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

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: