



State of Ohio Environmental Protection Agency

Southeast District Office

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

June 30, 2008

Re: Belmont County
EORWA
OPQ00000*MD
Compliance Evaluation Inspection
Correspondence (PWW)

Board of Trustees
Eastern Ohio Regional Wastewater Authority
P.O. Box 508
Bridgeport, Ohio 43912

Dear Board Members:

On May 29, 2008, Ken Mettler, of Ohio EPA's Special Investigation Unit, and I conducted a Compliance Evaluation Inspection (CEI) at the Eastern Ohio Regional Wastewater Authority (EORWA) Treatment Plant (WWTP). Dave Thomas, Executive Director, and Mike Dobbs, Operations Manager and Operator in Responsible Charge, represented EORWA during the plant inspection.

The purpose of the inspection was to determine EORWA's compliance status with the terms and conditions of the NPDES permit, federal number OH0049999, state number OPQ00000*MD and the January 1997 Consent Order (CO) and October 2004 Modification. 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 compliance with the permit on the day of the inspection. EORWA is in marginal compliance with the CO due to missed deadlines.

As a result of the inspection and file review, I have the following comments:

1. On January 23, 1997, Ohio EPA and EORWA entered into a CO which was the result of an enforcement case precipitated by effluent violations, unauthorized bypasses, reporting violations, dry weather combined sewer overflows and failure to maintain equipment. On October 27, 2004, the CO was modified to adjust the expiration date by which funds from the Community Sewer Improvement Fund must be spent, revise the deadline for performing the Wet Weather Stress Test and revise the deadline for providing a Wastewater Class IV certified operator. The following is a status report of the compliance schedule contained in the Consent Order. Only outstanding issues are noted.

Item	Due Date	Date Accomplished
Implement the 9 Minimum Controls for Combined Sewer Overflows (CSOs):	03/29/99	See item 1(a)
Wet Weather Stress Test:		
initiate study	1 year after plant upgrade	See item 1(b)
complete study and submit report	6/1/08	
implement recommendations	1 year after approval of report	
Certified Operator:		
hire Class IV or technical supervisor	04/23/97	04/07/97
permanently hire full time Class IV	8/31/06	See item 1(c)

- a. Provide a status report on compliance with the 9 minimum controls for the combined sewer overflows (CSOs).
 - b. EORWA is in non-compliance with the Wet Weather Stress Test deadlines contained in the CO. Provide an update on the Wet Weather Stress Test.
 - c. EORWA has requested and been granted a downgrade in the level of certified operator required for the facility. The new requirement is for a Wastewater Class III certified operator. Ohio EPA has received notification that Jeff Vaughn, Class IV operator, is no longer the operator of record and that Mike Dobbs, a Class III operator has taken that position.
2. In addition to the compliance schedule contained in the Consent Order, the NPDES permit contains a compliance schedule requiring submission of a Long Term Control Plan by 8/1/08. Provide a status update on the submission of this report.
 3. The secondary clarifier weirs were covered with significant algae growth and need to be cleaned. It is recommended that they be cleaned more often to minimize the amount of solids discharged from the plant. When maintenance is being performed, the clarifier should be taken off-line.
 4. EORWA has provided a portable backup generator and connections for that generator at 10 of the 16 pump stations. What backup power is provided at the remaining 6 pump stations? Provide an update on this. Also, EORWA must develop a written protocol for when the portable generator will be used to operate a lift/pump station. Provide a date by when this protocol will be submitted to Ohio EPA.

5. A review of the monthly operating reports since the last inspection on 12/13/05 shows that EORWA violated the effluent limitations contained in the NPDES permit on the following occasions:

TSS: 3/06, 2/07

cBOD₅: 2/07

Oil and Grease: 8/07

However, there have been no effluent violations so far in 2008.

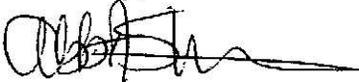
6. Provide the results of the latest DMRQA laboratory performance evaluation Study.
7. EORWA must enforce the terms and conditions of the discharge permits issued to Martins Ferry, Bridgeport, Brookside, Bellaire, and the Belmont County Sanitary Sewer District.

According to the permit requirements, EORWA should be receiving information from the permittees about SSO discharges. Since it is known that these sewer systems have SSO problems, EORWA must make it clear to the permittees that these events must be documented and reported. Has this been done? Provide a list of SSO events that have occurred in 2007.

8. Ohio EPA authorized the use of the Community Sewer Improvement Fund (CSIF) for the municipal sewer studies for Bridgeport, Brookside, Bellaire, and Martins Ferry. What is the status of the study and the report?

Please respond, in writing, within 30 days of receipt of this report, to items 1a, 1b, 2, 3, 4, 6, 7 and 8 above. If you have any questions, please contact me at your convenience.

Sincerely,



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

AS/dh

Enclosure

c: Dave Thomas, Director, EORWA
c: Mike Dobbs, Operations Manager, EORWA
c: Mark Mann, Ohio EPA, DSW, CO
c: AS file

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PQ0000*MD	OH0049999	May 29, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Eastern Ohio Regional Wastewater Authority (EORWA) Guernsey Street Bellaire, Ohio	10:30 a.m.	August 1, 2005
	Exit Time	Permit Expiration Date
	12:00 p.m.	July 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Dave Thomas, Director Mike Dobbs, Operations Manager	(740) 676-5911
Name, Address and Title of Responsible Official	Phone Number
Board of Trustees EORWA P.O. Box 502 Bridgeport, Ohio	(740) 676-5911

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>U</u> Compliance Schedules
<u>S</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>M</u> Collection System		

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

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

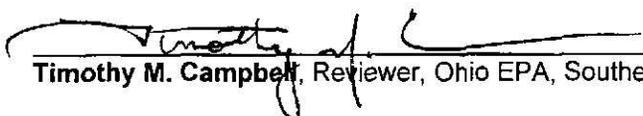
Collection System - SSO occurring at Bridgeport ballfield.
Compliance Schedule - Wet Weather Stress Test deadline was missed.



Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

6/30/08

Date



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

6/30/08

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>Consent Order (CO) & NPDES Permit</u>				
e. Permittee is meeting compliance schedule		X*		

Comments: *Permittee is not in compliance with CO schedule. See attached letter item (1).

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>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 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: *Generator is not capable of powering the entire WWTP.

**Pretreatment muffin monster is not working and will be replaced.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: 100%				
b. Any collection system overflows since last inspection (CSO <input checked="" type="checkbox"/> SSO <input checked="" type="checkbox"/>)	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: *10 of 16 lift stations can be run by a backup generator.

**Complaints have been received in Brookside.

H. SLUDGE MANAGEMENT

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

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

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: <input checked="" type="checkbox"/> ultrasonic & parshall flume <input type="checkbox"/> calculated from influent <input type="checkbox"/> weir <input type="checkbox"/> Other <input type="checkbox"/> ultrasonic & weir <input type="checkbox"/> Specify: _____	X			
b. Calibration frequency adequate (date of last calibration: 8/31/07)				
c. Secondary instruments (totalizers, recorders, etc.) properly operated and maintained				X
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured		X*		
f. Flow measuring equipment inspection frequency: _____ Daily _____ Weekly <input checked="" type="checkbox"/> Monthly _____ Other				

Comments: *Flow meter is on influent.

**Flow depth is measured manually once/month and compared to electronic depth measurement.

Part 2 - Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used	X			
Conform with 40 CFR 136.3	X			
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3, Laboratory - General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b. If alternate analytical procedures are used, proper approval has been obtained			X	
c. Analyses being performed more frequently than required by permit				X
d. If (c) is yes, are results reported in permittee's self-monitoring report				X
e. Commercial laboratory used 1. Parameters analyzed by commercial lab: <u>In house they do: cBOD, TSS, Fecal, Ammonia, pH, DO; everything else goes to lab</u> 2. Lab name: <u>Stark in Canton</u>	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: _____		_____ Satisfactory			
		_____ Marginal			
		_____ Unsatisfactory			

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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