



State of Ohio Environmental Protection Agency

Southeast District Office

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

October 21, 2009

**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 September 15, 2009, Paul Novak and Dan Gill, also of Ohio EPA's Division of Surface Water, 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, and Jeff Vaughn, engineer, 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 and to gather information for the review of the EORWA Long Term Control Plan (LTCP). Wastewater samples were not taken. A copy of the inspection report form is attached. (Note: Compliance samples were taken by the Ohio EPA water quality staff on 11/3-4/08. Those sampling results are attached to this report.)

Based on the inspection and file review, the facility was found to be in compliance with the permit and the CO on the day of the inspection.

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.
 - a. Wet Weather Stress Test - EORWA submitted the results of the wet weather stress test, done 3/26/09, on 4/9/09, and is therefore in compliance with the CO requirement. It is recommended that a follow-up wet weather stress test

be performed under more routine circumstances. As Paul Novak suggested, it would also be useful to know if blending is an option to handle more flow through the plant.

- b. Certified Operator – EORWA submitted an NPDES permit modification request to lower the certified operator classification required from a Class IV to a Class III, as supported by the new operator certification rules. On April 1, 2008, the EORWA NPDES permit was issued with a modification allowing for a Class III operator of record. Therefore, EORWA is in compliance with this milestone from the CO.
2. The NPDES permit contains a compliance schedule requiring submission of a Long Term Control Plan. The LTCP was submitted on 7/31/08. As part of the inspection, OEPA was shown parts of the service area where changes are proposed for the sewer system in the LTCP. Jeff Vaughn also made a presentation of the LTCP.
 - a. A follow-up meeting to continue discussion of the proposed controls was held on September 30, 2009. EORWA identified a series of controls, including plugging overflows, raising weirs, installing backflow preventers, downspout disconnection, stormwater redirection, local storage, rerouting of industrial discharges and construction of relief sewers to address the various sewersheds within its service area and bring their overflows into compliance with the National CSO Policy.
 - b. EORWA should move forward with raising weirs, installing backflow preventers and plugging overflows that are believed to be inactive. Also, EORWA should submit proposals with 15 and 20 year fixed-date implementation schedules, and should identify particular projects that should be given highest priority (i.e., those addressing the biggest overflows and the rerouting of industrial discharges within the collection system). Ohio EPA asked EORWA to investigate potential areas for further optimization at the WWTP. Provide a progress report on these LTCP issues to Dan Gill, OEPA DSW Central Office (copy to Abbot Stevenson, SEDO), by the end of October 2009.
3. A review of the monthly operating reports since the last inspection on 5/29/08 shows that EORWA violated the effluent limitations contained in the NPDES permit on the following occasions:

TSS: 12/08
cBOD₅: 12/08

However, there have been no effluent violations to date in 2009.
4. EORWA has requested permission to monitor in accordance with the permit only the CSOs that discharge. Provide a list of CSOs that have been shown by previous monitoring to be inactive and we will consider revising your monitoring requirements.

5. 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 2008.

Please respond, in writing, within 30 days of receipt of this report, to items 2b, 4, and 5 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: Dan Gill, 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	September 15, 2009	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	10:00 a.m.	August 1, 2005
	Exit Time	Permit Expiration Date
	3:30 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 Jeff Vaughn, Engineer	(740) 676-5911 (740) 695-7256
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>S</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>S</u> Collection System		

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

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



Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

10/20/09

Date



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

10/20/09

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			

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>	X			
e. Permittee is meeting compliance schedule	X			

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.

**Wet weather stress test done 3/26/09.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>100%</u>				
b. Any collection system overflows since last inspection (CSO <u>X</u> SSO <u>X</u>)	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.
 **Only during wet weather.

H. SLUDGE MANAGEMENT

	Yes	No	N/A	N/E
a. Sludge adequately disposed (Method: <u>Land application</u>)	X			
b. If sludge is incinerated, where is ash disposed of? _____			X	
c. Is sludge disposal contracted (Name: <u>Mid-Ohio from Cleveland</u>)	X			
d. Has amount of sludge generated changed significantly since last inspection		X		
e. Adequate sludge storage provided at plant	X			
f. Land application sites monitored and inspected per SMP	X			
g. Records kept in accordance with state and federal law	X			
h. Any complaints received in last year regarding sludge		X		
i. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

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: <u>X</u> ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _____ ultrasonic & weir _____ Specify: _____	X			
b. Calibration frequency adequate (date of last calibration: <u>9/1/09</u>)				
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 _____ X** 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			

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>	X			
2. Lab name: <u>Stark in Canton</u>				

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: <u>2008</u> <u> </u> Satisfactory <u> </u> X Marginal <u> </u> Unsatisfactory				

Comments: i. Contract lab missed copper.

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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

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?