



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

June 26, 2007

**Re:** Belmont County  
Fox Shannon WWTP  
Self-Monitoring Report Violations  
Ohio EPA Permit No. OPG00063\*CD  
NPDES Permit No. OH0107956  
Correspondence (PWW)

Belmont County Commissioners  
Belmont County Courthouse  
101 W. Main Street  
St. Clairsville, Ohio 43950

Dear Commissioners:

On April 10, 2007, Tim Campbell and I, of Ohio EPA's Division of Surface Water, performed a follow-up inspection to the compliance evaluation inspection of January 18, 2007. Mark Esposito, Dan Walls, Bill Timko, Rich Maleski and Jeff Vaughn, their consultant, represented Belmont County Sanitary Sewer District (BCSSD) during the 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 OH0107956, State Number OPG00063\*CD. Wastewater samples were not collected. A copy of the inspection report form is attached.

Based on the evaluation of the facility, the Fox-Shannon Wastewater Treatment Plant (WWTP) was found to be in **marginal compliance** with the permit on the day of the inspection due to NPDES permit requirements and effluent violations.

The following comments/problems were noted as a result of the inspection:

1. The NPDES permit is in the process of being renewed. A pre-permit inspection was performed on January 18, 2007. The permit will be issued in draft form in the near future. It contains requirements for infiltration and inflow removal from the collection system, and relocation of the composite sampling station, among other changes. Please read it carefully and comment within 30 days of receipt.
2. Ohio EPA has received at least 6 complaints over the last year from more than one source indicating that the discharge from the Fox Shannon effluent pipe was brown like chocolate milk. Since the discharge pipe is located on SR 331 and not

on the plant property it is visible to the public. Ohio EPA has only been able to substantiate a couple of these complaints, however, we do not discount the validity of the others.

We suspect that the WWTP was carrying a very high solids inventory in the plant. When the flows increase due to rainfall events, it washes solids out of the plant. Some of the solids accumulate in the effluent equalization tank, the rest is discharged to the creek.

In order to minimize this, BCSSD must do a better job of managing their sludge. The mixed liquor in the oxidation ditch needs to be reduced to just the level needed for treatment. The clarifier sludge blankets must be managed carefully. Sludge should be removed from the plant more regularly. Finally, Fox Shannon must reduce the infiltration and inflow in the collection system that is causing the plant to have high flows which washes sludge out of the plant.

3. Meetings about the excessive inflow and infiltration (I/I) in the collection system were also held on April 10, 2007, with the Union Local School Superintendent Kirk Glasgow and Maintenance Supervisor Frank Sulek, and the Village of Morristown, represented by Mayor Robert Thomas, consultant Keith Bennett, Ed Sustarsik, Esq. and others. At both meetings Mark Esposito and Ohio EPA stressed the importance of finding out where the extraneous water is coming from and developing a plan to remove it. Both facilities were informed that the Fox Shannon NPDES permit renewal will contain compliance schedules that require BCSSD to require the removal of I/I.
4. It has been determined that the composite samples taken for monitoring compliance with the NPDES permit at outfall 001 are taken at a location that does not result in representative samples. The draft NPDES permit contains a requirement to relocate the composite sampling station to a point after the equalization tank. Options that have been discussed are: tapping into the force main leaving the effluent pump station for the installation of a sampler; and installing a sampler at the effluent pipe. The samples must be flow proportioned. *You will need to submit plans for the new sampling station and flow meter.*

In addition, the draft permit contains revised descriptions of the grab sample location for outfall 001 to be taken at the effluent pipe outlet.

5. Fox Shannon has routinely violated ammonia limits over the last few years during the Jamboree in the Hills Festival, due to receipt of septage from the festival. The BCSD must devise a method to receive this waste without causing violations at the WWTP or you must stop receiving this septage. BCSD will be liable for fines up to \$10,000 per day of violation if these preventable violations occur.

Every effort must be made to comply with the effluent limits contained in the NPDES permit.

6. When was the effluent flow meter calibrated? It should be calibrated annually.

Please respond to comments 2, 5, and 6 within 20 days of receipt of this notice. If there are 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: Mark Esposito, Director, Belmont County Sanitary Sewer District  
c: AS file

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPG00063*CD	OH0107956	April 10, 2007	C	S	1

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Fox Shannon WWTP 68750 Hammond Road St. Clairsville, Ohio 43950	10:30 a.m.	August 1, 2001
	Exit Time	Permit Expiration Date
	12:30 p.m.	July 31, 2006

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Bill Timko, Chief Plant Operator	(740) 695-6669
Name, Address and Title of Responsible Official	Phone Number
Mark Esposito, Director Belmont County Sanitary Sewer District P.O. Box 457 St. Clairsville, Ohio 43950	(740) 695-3144

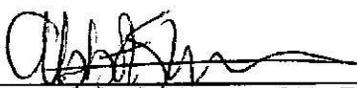
**C. AREAS EVALUATED DURING INSPECTION**

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

Operations & Maintenance: See items 2 and 5 in the attached letter.  
Collection System: See item 3 in the attached letter.  
Sludge: See item 2 in the attached letter.  
Self-monitoring: See item 4 in the attached letter.

  
 Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

6/25/07  
 Date

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

6/25/07  
 Date

OHIO ENVIRONMENTAL PROTECTION AGENCY  
TELEPHONE MEMORANDUM

WITH Dan Walls, left message DATE 4/16/07  
REPRESENTING \_\_\_\_\_ TIME \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ PHONE \_\_\_\_\_  
OEPA STAFF Abbot  
SUBJECT fox shannon wwtp

NOTES & SUMMARY

FOLLOW-UP DATE \_\_\_\_\_

They are starting to clean the EQ tank. Loading up beds, not discharging.

4/27/07 - Mark Esposito called left message - done cleaning EQ tank. Dirtier than they thought. They will clean 2X per year. They put it on the sludge beds. Washed out ran back to beds. Some sludge in pipes got discharged Otherwise no discharge. Little bit of odor at end of pipe but looks clear. Should clear up before day is over.