



State of Ohio Environmental Protection Agency

Southeast District Office

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

August 12, 2009

Re: Belmont County
City of St. Clairsville
Compliance Evaluation Inspection
Ohio EPA Permit #OPC00014*FD
Correspondence (PWW)

Mayor and Council
City of St. Clairsville
100 N. Market Street
St. Clairsville, Ohio 43950

Dear Mayor and Council:

On June 22, 2009, Tim Campbell and I conducted a compliance evaluation inspection at the City of St. Clairsville's Wastewater Treatment Plant. Josh Goodridge, Plant Superintendent, was present during the inspection.

Prior to the inspection we met with Mayor Vincenzo, Service Director Dennis Bigler, and Mr. Goodridge to discuss the condition of the sanitary sewers in the city.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, federal number OH0027294, state number OPC00014*FD. Wastewater samples were not taken. A copy of the inspection report form is attached.

Based on the meeting, the inspection and file review, the St. Clairsville's Wastewater Treatment Plant was found to be in non-compliance on the day of the inspection. The following is a summary of my comments and recommendations:

1. There have been several reported and unreported sanitary sewer overflows (SSOs) of the pump stations and the sewers, particularly the St. Clair pump station and the manhole at the head of the plant. The permittee must look for and report all SSOs in accordance with the permit, Part II, Item (Q)(1) and (2).

At a meeting held with the Mayor and Service Director prior to the inspection to discuss the inflow and infiltration problems in the city, the permittee agreed to complete smoke testing of the rest of the city within 1 year, and to correct problems discovered within 3 years. Ohio EPA expects the permittee to submit a report by August 1, 2010, listing problems found, plans for repair, and a schedule to complete the work by August 1, 2012. A manhole evaluation form is attached for your use, as necessary for the survey.

2. The NPDES permit Part II, Item (B) requires the WWTP to be staffed in accordance with the Operations and Maintenance (O&M) manual. The O&M manual for this facility requires 4 total FTEs at the WWTP or about 3 just for operations and maintenance. At the time of the inspection, there were no full time operators assigned to the plant. In addition, the operator certification rules OAC 3745-07 and the NPDES permit Part II, Item (A) require the operator in charge to be present at the WWTP 5 days a week for at least 20 hours total. Identify the staff members who are assigned to the WWTP. If you cannot provide the required staff, provide a justification.

In order to ensure proper plant operation and maintenance, it is recommended that a O&M program be established. The operator certification rules, OAC 3745-07-09 now contain record keeping requirements for maintenance, staffing hours, and plant operation. All certified operators at this facility should become familiar with the record keeping requirements and responsibilities of a certified operator contained in this rule.

3. The plant comminutor is still out of service. According to Part III, Item 3, all wastewater treatment works shall be properly operated and maintained at all times. The lack of proper preliminary treatment is evident throughout the plant because of the amount of rags present in the system everywhere. These rags cause maintenance problems throughout the plant. Provide a schedule when the comminutor, or an alternative system, will be installed.
4. As stated in the last inspection report, the two final clarifiers showed a moderate buildup of sludge and algae on the weirs and baffles. Cleaning of the weirs and baffles should be done as needed to prevent buildup of algae on the weirs and trough which may lead to solids violations. According to Part III, Item 3, the permittee shall properly maintain and operate all treatment components to assure compliance with the permit.
5. It was also observed during the inspection that there were signs of old sludge in the clarifiers. What method is used for determining the rate of sludge wasting?
6. As stated in the last inspection report, it was unknown when the effluent flow meter was last calibrated. The facility flow meters shall be calibrated at least once a year including the plant chart recorder. Provide a date when this will be done.
7. The flow meter at the St. Clair pump station is not operational. Provide a date when it will be repaired or replaced, as required by Part II, Item 3 of the NPDES permit regarding operation and maintenance.

8. On the day of the inspection, the influent sampler was not working. The NPDES permit does not require the influent samples to be taken mechanically, therefore grab samples are acceptable. However, they must be taken in accordance with Part II, Item E of the NPDES permit.
9. The effluent sampler did not have a proper thermometer and there was no temperature log. Provide a date when a proper thermometer will be provided. A temperature log shall be started upon receipt of this letter.
10. During the lab inspection with Sue Bell, it was determined that there were discrepancies from approved procedures with certain lab tests. After discussion with Ohio EPA staff, it was decided that she would obtain Quality Control/Quality Assurance samples from an approved laboratory. After running the samples, it was determined that changes in procedures were needed. It is strongly recommended that the permittee participate in the annual Quality Control/Quality Assurance sampling program recommended by Ohio EPA for minor facilities such as St. Clairsville to insure proper sampling analysis techniques are followed. We will continue to work with Sue on this issue.
11. The permittee needs to finish prior commitments to telemeter all the pump stations. Aneda Woods, Spaceview, and The Highlands are the remaining pump stations that are not yet telemetered. Provide a date when this will be completed. It is our understanding that the alarms at the plant and the pump stations on the system alarm at the water treatment plant, which is manned 24 hours a day.

Please respond to comments 1 through 11 above, in writing, within 20 days of receipt of this notice. If you have any questions, please call me at your convenience at (740) 380-5284.

Sincerely,



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

AS/dh

Enclosures

c: Josh Goodridge, Plant Superintendent, City of St. Clairsville
c: Dennis Bigler, Service Director, City of St. Clairsville
c: AS File

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PC00014*ED	OH0027294	June 22, 2009	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of St. Clairsville Wastewater Treatment Plant Legion Road Extension St. Clairsville, Ohio 43950	12:00 p.m.	July 1, 2003
	Exit Time	Permit Expiration Date
	2:00 p.m.	June 30, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Josh Goodridge, Plant Superintendent	(740) 695-0191
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council City of St. Clairsville 100 N. Market Street, P.O. Box 537 St. Clairsville, Ohio 43950	

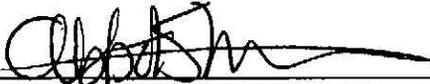
C. AREAS EVALUATED DURING INSPECTION

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

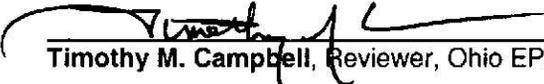
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated; N/A = Not Applicable)

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

- O&M - See attached letter items 2-9
- Collection System - See attached letter item 1 and 11
- Self-Monitoring Program - See attached letter item 10


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

8/13/09
Date


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

8/13/09
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*		

Comments: *Sanitary Sewer Overflows (SSO) like the St. Clair lift station are not permitted discharges.

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: _____			X	
e. Permittee is meeting compliance schedule			X	

Comments: *SSO at St. Clair lift station is an unauthorized discharge.

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: No. of shifts: <u> 1 </u> Days/Week: <u> 5* </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 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

Comments: *Four operators including one full time lab technician for day shift operation.
 d. The plant needs a dedicated operator to perform daily maintenance, trash in plant, weirs.
 k. plant experiences hydraulic overloads.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0</u> %				
b. Any collection system overflows since last inspection: CSO _____ SSO: _____	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: b. Manhole at head of plant discharged recently.
c. The operator is beginning to report SSO's.
g. 3 lift stations are not on scada system: Aneda Woods, Spaceview, and The Highlands.
h. St. Clairsville has operating portable generators.

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: _____)		X		
d. Has amount of sludge generated changed significantly since last inspection		X		
e. Adequate sludge storage provided at facility	X			
f. Land application sites monitored and inspected per state rules	X			
g. Records kept in accordance with state rules	X			
h. Any complaints received in last year regarding sludge		X		
i. Is sludge adequately processed (digestion, dewatering, pathogen control) in accordance with Ohio EPA rules	X			

Comments: f. and g. Jacob Howdyshell, Sludge Coordinator for Ohio EPA, inspected the facility on 9/20/07. Reference is made to his 4/25/08 inspection report.

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				

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	Clear	None	Some	Colorless	

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?