



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 26, 2008

Re: Coshocton County
Coshocton WWTP
Compliance Evaluation Inspection
Correspondence (PWW)

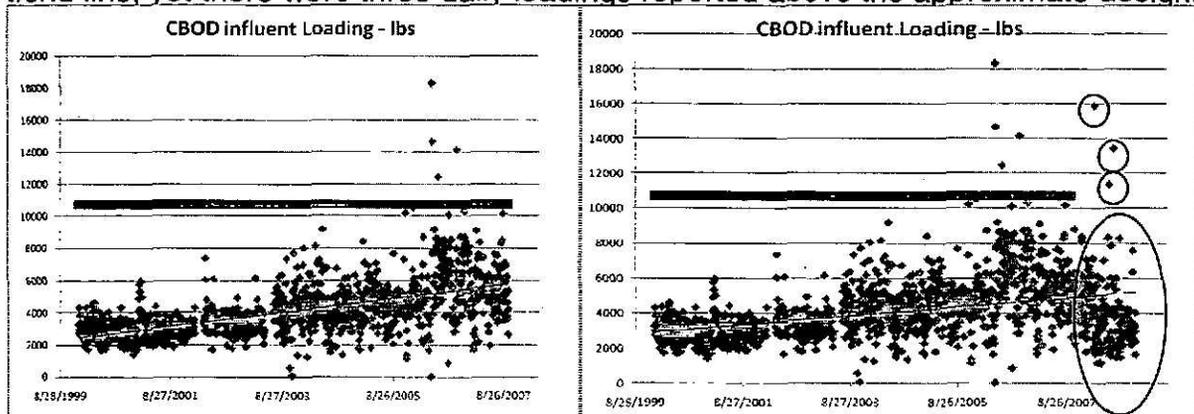
Mayor and Council
City of Coshocton
760 Chestnut Street
Coshocton, Ohio 43812

Dear Mayor and Council:

On December 18, 2008, Ohio EPA conducted a Compliance Evaluation Inspection at the City of Coshocton Wastewater Treatment Plant (WWTP). The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number OPD00004*ID and evaluate the wastewater treatment systems performance.

I reviewed the self-monitoring data from October 1, 2007, through December 1, 2008. During that period, no limit violations of the permit occurred.

To follow up from the last Inspection report, I have included the chart from the previous correspondence (left) plus a second chart showing data up through December 1, 2008, (right). The charts include data reported since January 2000 with pounds of CBOD on the y axis and dates on the x axis. The blue marks indicate the daily loading placed on the Coshocton WWTP, while the red line indicates the organic loading design capacity of the plant with the ability to treat secondary effluent limits as required by NPDES permit. I have included this data to show the current status of the demand on the plant. One can see that the bulk of the influent loadings over the past year were below the trend line, yet there were three daily loadings reported above the approximate design.



For clarity, the zero loadings in the chart indicate where a code was reported and a number value could not be correlated, so the two points indicating zero are not valid.

Items needing addressed:

1. The current permit in Part I, C. Item B requires program modification to implement changes to Ohio's Pretreatment Rules no later than six months (November 1st, 2008) from the effective date of the permit. This item is behind schedule and needs addressed to become compliant with the permit. We have been informed by both Mike Zeigler and Dave McVay that this modification is near completion.
2. The effluent meter has reportedly not been calibrated in the last few years. Flow meters are to be calibrated at a minimum frequency of once annually, if not more frequently, based on the manufacturer's recommendations. The meter needs calibration.
3. Items which still need completed with regards to the Coshocton Ethanol Lift Station (an overflow recently occurred due to pump failure):
 - a. Lag pump feature as was approved by the agency in the Permit to Install (PTI) needs addressed. At a minimum, an explanation for why this was not implemented.
 - b. An alternator for the two pumps approved in the PTI is in question. Please verify. It is our understanding that the lift station is just running off one pump. We typically like to see the pumps share duty. And the lag pump feature on top of the alternator will have the second pump kick on before an overflow incident if the first one called on fails.
 - c. The PTI application also called for a flow control valve to be operable by an operator at the pretreatment plant, which has not been addressed with the project. It was included as part of the SCADA system in the PTI plans.
 - d. The float system for pump on, pump off, alarm/lag is different from what was included in the approved PTI. At a minimum, please explain and/or modify.
 - e. The pump failure was apparently caused when the breakers to the pumps were tripped. It is believed that moisture shorted some exposed electrical conductors. Lift station applications in general are required to standup against high moisture. Properly rated NEMA enclosures shall be used for making conductor connections and located accordingly.

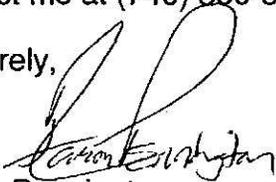
To summarize, the force main and lift station project does not appear to be fully completed in accordance with the plans approved by the agency.

4. Per Permit Item I. C. Item C. Mercury Variance Requirements – Before May 1, 2009, the city will need to review effluent mercury monitoring data and decide whether it believes the new water quality standard can be complied with or a variance requested. The city's effluent results for mercury do not show the

current ability to meet the new water quality standard; therefore, it looks like a variance will need to be requested. The variance application does involve some legwork and I recommend that the city begin as soon as possible to minimize the chance of missing the by May 1, 2009 date.

Please follow up on the above addressed items within thirty days of receipt of this letter. A copy of our inspection report is enclosed. The assistance and cooperation received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AP/jg

Enclosures

c: Dave McVay, Superintendent, Coshocton WWTP (w/enclosure)

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|-------------------|-----------------|-----------|---------------|
| 0PD00004*ID | OH0024775 | December 18, 2008 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|--|-------------|------------------------|
| Coshocton Wastewater Treatment Plant 2742 CR 271 Coshocton, Ohio 43812 | ~10:00 A.M. | May 1, 2008 |
| | Exit Time | Permit Expiration Date |
| | ~12:00 P.M. | July 31, 2012 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|--|---|
| Mike Zeigler, Pretreatment Coordinator Tom Watts, Lead Operator / Lab Tech | (740) 622-1684 (740) 622-1684, ext. 11 |
| Name, Address and Title of Responsible Official | Phone Number |
| Mayor and Council City of Coshocton 760 Chestnut Street Coshocton, OH 43812 | |

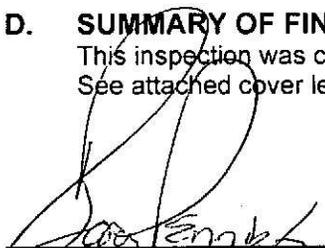
C. AREAS EVALUATED DURING INSPECTION

| | | |
|-----------------------------------|------------------------------------|----------------------------------|
| <u>S</u> Permit | <u>M</u> Flow Measurement | See <u>PCI</u> Pretreatment |
| <u>S</u> Records/Reports | <u>N</u> Laboratory | <u>M</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>N</u> Collection System | | |

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

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

This inspection was conducted alongside a Pretreatment Compliance Inspection with Fred Snell from the Agency. See attached cover letter.


Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

12-23-08
Date


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

12/29/08
Date

| Collection System | Yes | No | N/A | N/E |
|--|----------------|----|-----|-----|
| a. Percent combined system: <u>0%</u> | | | | |
| b. Any collection system overflows since last inspection (SSO <u>1</u>) | X ¹ | | | |
| 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 |

¹ CE Lift Station overflow.

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): 3/16/01 Submitted Date
06-253-PW Approval Number
 _____ Not submitted
 _____ N/A

| | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| b. Sludge Management Plan current | X | | | |
| c. Sludge adequately disposed | X | | | |
| d. If sludge is incinerated, where is ash disposed of? | | | X | |
| e. Is sludge disposal contracted? Synagro | 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 | X | | | |

| 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: Satisfactory in DMR-QA 28 close date 8-29-08 | | | | | | |

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

| Outfall | Oil Sheen | Grease | Turbidity | Visible Foam | Visible Float Solids | Color | Other |
|---------|-----------|--------|-----------|--------------|----------------------|---------------|-------|
| 001 | None | None | Slight | None | Some small flocs | Slightly dark | |
| | | | | | | | |
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