



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

April 21, 2009

Re: Jackson County
Village of Coalton WWTP
Ohio EPA Permit No. 0PA00012*ED
NPDES Permit No. OH0050776
Compliance Evaluation Inspection
Correspondence (PWW)

Mayor Frank Doenges and Council
Village of Coalton
P.O. Box 98
Coalton, Ohio 45621

Dear Mayor Doenges and Council:

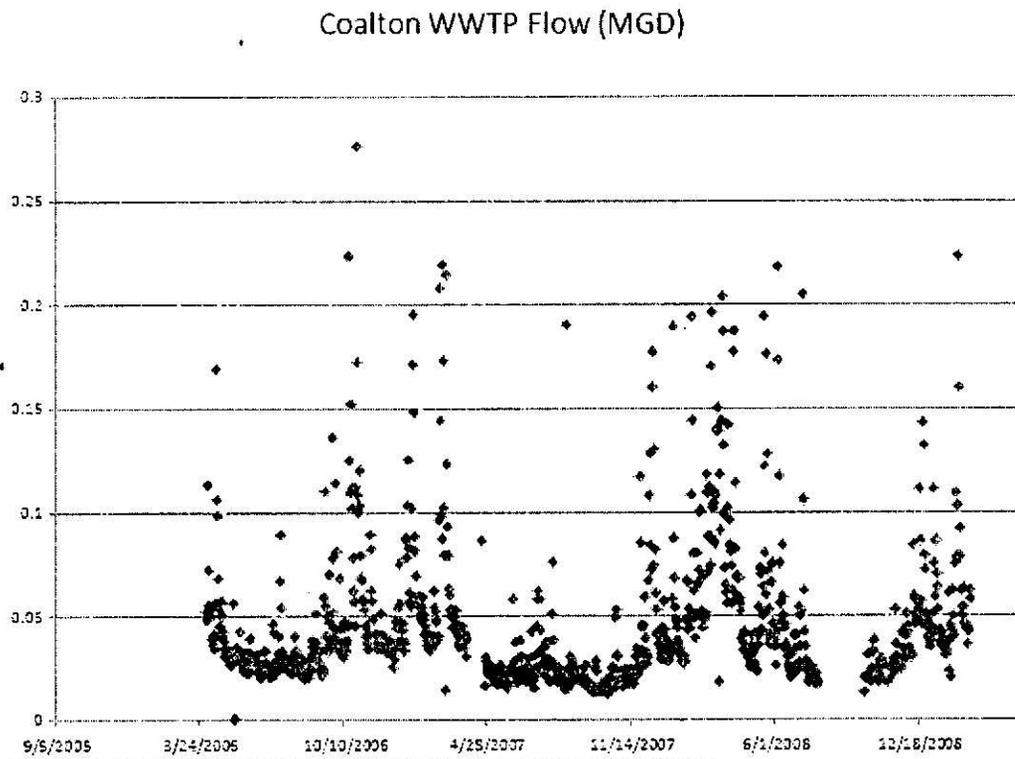
On April 15, 2009, Ohio EPA conducted a Compliance Evaluation Inspection at the village's wastewater treatment plant. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0PA00012*ED and to evaluate the wastewater treatment systems performance. Mr. Dave Carpenter represented the Village of Coalton during the inspection.

We have received self-monitoring reports covering the months of November 2008 through February 2009 for the referenced facility. Our review indicated the following violation of the conditions of your NPDES permit.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Qty	7.57	8.4784	2/8/2009

The Village is required by the permit to contact our agency when non-compliance is occurring and/or recently occurred. For reporting non-compliance, I suggest entering <http://www.epa.state.oh.us/dsw/permits/permits.html#noncompliance> into an internet browser. Once opened go to the bottom left box called Non-compliance Notification. There are two different Word documents that can be sent via e-mail. One is for reporting plant bypasses or upsets, the other is for reporting when a permit limit has been exceeded. The recommended notification for compliance with Part III .12 of the permit is to route the completed forms to my e-mail address aaron.pennington@epa.state.oh.us. A separate form for Sanitary Sewer Overflows in the collection system can be found at http://www.epa.state.oh.us/dsw/permits/ssso%205%20day%20report%20final%2008%2004_fis.pdf

The permit requires on page 6 Part I, C. that an Inflow and Infiltration Control Plan be submitted to the Ohio EPA, Southeast District by September 1, 2007. The agency is still waiting on a copy. I was notified during the inspection that smoke testing has been performed and some areas identified for lateral repairs, but no comprehensive plan has been pulled together. Please identify in your response to this letter an outline for completing an Inflow and Infiltration Control Plan. As seen in the charted data below, I&I is still a relevant issue with a design flow of 0.05MGD.



The current permit operator classification requirement for the treatment plant is not consistent with the Ohio Administrative Code OAC 3745-7-04 **Treatment works and sewerage system classification and staffing requirements**. A proposed NPDES modification addressing operator classification along with nutrient monitoring was public noticed as a draft on April 6, 2009. The modified permit, yet to be issued, with extension *FD will likely have an effective date June 1, 2009.

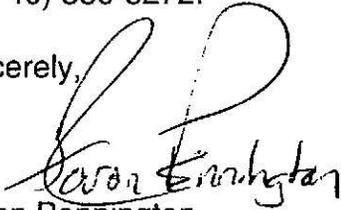
Some notable ongoing maintenance included: replacement of clarifier chains drive motor, replacement of effluent sampler, and inoperable portable generator for the Collection System Lift Station.

Mr. Carpenter during the inspection asked about what could be done to treat septage from the Village's septic tanks at the Village's WWTP. I advised against attempting to treat the septage at the existing facility. A plant this size would have to have the

septage equalized into the treatment train. Additionally, a large portion of the septage would be expected to end up in the sludge which is hauled to another POTW. So why collect and haul it twice? If designing to incorporate septage receiving as part of an upgraded WWTP, consider a sludge treatment scheme which would be applicable to Land Application regulations.

Please respond in writing within thirty days to the above highlighted comment. A copy of the 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

AMP/dh

Enclosure

c: Dave Carpenter

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PA00012*ED	OH0050776	April 15, 2009	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Coalton WWTP 69 Shook Street Coalton, Ohio 45621	9:00 a.m.	September 1, 2006
	Exit Time	Permit Expiration Date
	11:00 a.m.	August 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Dave Carpenter, Plant Operator	(740) 441-5772
Name, Address and Title of Responsible Official	Phone Number
Mayor Frank Doenges Village of Coalton P.O. Box 98 Coalton, Ohio 45621	(740) 286-6986

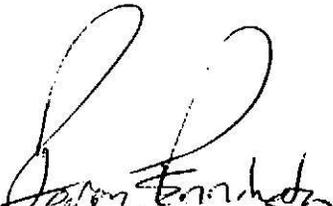
C. AREAS EVALUATED DURING INSPECTION

<u> S </u> Permit	<u> S </u> Flow Measurement	<u> N </u> Pretreatment
<u> S </u> Records/Reports	<u> N </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> U </u> Collection System		

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

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

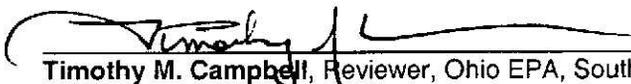
See attached cover letter.



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

4-21-09

Date



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

4/21/09

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: *The Plant has a high inflow and infiltration problem which can attribute to loading violations as pass through.

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: *The permit requires on page 6 Part I, C. a compliance schedule for an Inflow and Infiltration Control Plan to be submitted to the Ohio EPA, Southeast District by September 1, 2007. The agency is still waiting on a copy. I was notified during the inspection that smoke testing has been performed and some areas identified for lateral repairs, but no comprehensive plan has been pulled together.

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> 5 Days/Week (1 employee) </u>	X			
e. Operator holds unexpired license of class required by permit Class: <u> 1 for Class II plant </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: *An NPDES modification proposal has been sent to the Village which would modify the operator classification in the permit to a Class I.

**Clarifier chains drive motor, effluent sampler, portable generator for the Collection System Lift Station.

