



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

April 2, 2009

Re: Jackson County
City of Jackson
OPD00008*GD
Compliance Sampling Inspection
Correspondence (PWW)

Mayor Randy Heath
Council President
Memorial Building, 145 Broadway Street
Jackson, Ohio 45640

Dear Mayor and Council President/Members:

On February 9, 2009, Tim Campbell, Aaron Pennington, Joann Montgomery and I conducted a Compliance Sampling Inspection (CSI) at the City of Jackson's Wastewater Treatment Plant (WWTP). Mike Gambino, Superintendent, and Billy Miller, Chief Plant Operator, represented the city on the inspection.

The purpose of the inspection was to determine the city's compliance status with the terms and conditions of the NPDES permit, federal number OH0020834, state number OPD00008*HD, and the 2007 Consent Order. Wastewater samples were taken. Sample results will be forwarded to you later when we receive them from our lab. A copy of the inspection form is attached.

Based on the inspection and file review, the facility was found to be in marginal compliance with the permit and the consent order on the day of the inspection due to effluent violations and plant bypasses.

As a result of the inspection and file review, I have the following comments:

1. The bypass was discharging during the inspection. It does not appear that Jackson is maximizing the use of the equalization tank prior to activating the bypass. Activating the bypass must be a last resort when nothing else can be done to prevent the discharge of only partially treated sewage. During the construction upgrade, Jackson must maximize the use of all treatment units before activating the bypass.

It is strongly recommended that Jackson take advantage of the free technical assistance offered by Ohio EPA through the Compliance Assistance Unit. This unit provides a complete evaluation of your treatment process and makes recommendations on how to improve treatment. Please contact Keith Kroger at (614) 836-8778, or Jon van Dommelen at (614) 644-2011. See also: http://www.epa.state.oh.us/dsw/compl_assist/compasst.html

2. The influent flow meter was not in service because it was accidentally damaged by the contractor. Provide a date when this unit will be restored to operation.
3. The influent sampler refrigerator was not cooling the sample to the required temperature. Also, a log should be kept of the daily temperature of the samplers.
4. Pharmaceutical pills were observed in the screen room floor of the wet well. These medications could affect the microorganisms in the wastewater process. Possible sources are medical facilities such as the hospital and nursing homes, and the local jail, among others. Jackson should monitor the situation and if it continues, it is recommended that a medical facility outreach program to educate medical professionals on the proper disposal of waste pharmaceuticals should be developed.
5. One of the primary clarifiers was out of service for repairs. Since this affects the quality of the bypass, this unit should be repaired as soon as possible. Provide a date when the repairs will be completed.
6. There was a significant amount of grease on the clarifiers. It is understood that this is temporarily caused by the changes necessitated by the construction, however, some system for removal needs to be developed, and used more often. The Compliance Assistance Unit may have some suggestion on how to handle this problem.
7. The weir troughs of the final clarifiers need to be cleaned. Provide a date when this maintenance will be performed.
8. The gas leak caused by the construction project should be repaired as soon as possible. The odor was noticeable near the equalization tank/primary clarifier area.
9. The effluent sampler and sampler house need to be cleaned. Provide a date by when this will be done.
10. The effluent flow meter has not been calibrated for over a year (8/6/07). The meter should be calibrated in accordance with manufacturers recommendations or at least once a year. Provide a date when this will be accomplished.
11. In the new MBR building pump room there is a problem with the pump hoist, which has been mounted in a way to prevent proper use. This needs to be redone so that the I beam runs from one end to the other and so that the hoist can carry a pump outside to the docking area. It is suggested that the beam be lowered below the piping to allow for this.

12. It is our understanding that the city discovered a sewer plug in the York Street sewer. Provide a date when this sewer will be cleaned and the plug completely removed. Ohio EPA is concerned that the York Street sewer is undersized for the flow from Belisio's and the sewage generated by the community in this area. Provide a date when a capacity evaluation for this sewer line will be completed.
13. I have requested that Jacob Howdysshell, the district sludge coordinator, inspect this facility in the near future to evaluate your compliance with the sludge regulations. Jacob can be reached at (614) 644-2018.
14. The NPDES permit and the Consent Order contain conflicting compliance deadlines for completion of construction. It is our opinion that the Consent Order dates have primacy.

Please respond, in writing, to items 1 through 12 above, within 30 days of receipt of this notice. 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: Greg Wilson, Director of Water and Wastewater
c: Lauren Angell, AGO
c: Rachel DeMuth, CO, DSW
c: AS file

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00008*HD	OH0020834	February 9, 2009	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Jackson Wastewater Treatment Plant Wood Avenue Extension Jackson, Ohio 45701	10:00 a.m.	August 1, 2006
	Exit Time	Permit Expiration Date
	1:30 p.m.	January 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mike Gambino, Supt. Billy Miller, Chief Plant Operator	(740) 286-1137
Name, Address and Title of Responsible Official	Phone Number
Mayor Randy Heath City of Jackson 145 E. Broadway Street Jackson, Ohio 45701	(740) 286-3224

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> M </u> Operations & Maintenance	<u> U </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		

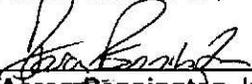
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

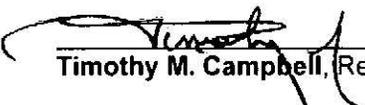
Collection System – Jackson must continue to look for and remove inflow/infiltration.
Effluent/Receiving Waters – Jackson continues to discharge partially treated sewage through the bypass.


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

4/2/09
Date


Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

4/2/09
Date


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

4/2/09
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				

Comments: *The plant is undergoing a \$15 million upgrade. New treatment will be added at that time.
 **Jackson still has a main plant bypass which must be eliminated 10/1/09.

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>Permit & CO</u>	X			
e. Permittee is meeting compliance schedule	X*			

Comments: *There is a conflict between the permit and the Consent Order deadlines for completion of construction. Permittee is meeting Consent Order compliance schedule.

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: _____				
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>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: <u>IV</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: <u>X</u> on MORS <u>X</u> 800 No.	X			
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

Comments: *During construction, Jackson has taken the trickling filters and Plant #1 aeration off line because parts of the new plant design calls for this. Also, one of the primary clarifiers was down for repairs.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: _____ %		X		
b. Any collection system overflows since last inspection: CSO _____ 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: *The city relined 90% of the storm and sanitary sewers in the downtown area.

**There may be a capacity problem with the York Street sewer.

H. SLUDGE MANAGEMENT

	Yes	No	N/A	N/E
a. Sludge adequately disposed (Method: _____)	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: *Amount of sludge

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: _____)		X*		
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: <u>X</u> Daily _____ Weekly _____ Monthly _____ Other				

Comments: *The influent flow meter was out of service.

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?

Comments: *There was an active gas leak that was detectable near the EQ tank/Primary Clarifier.