



State of Ohio Environmental Protection Agency

Southeast District Office

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

May 13, 2009

Re: Jackson County
Village of Oak Hill WWTP
Ohio EPA Permit No. OPB00055*GD
NPDES Permit No. OH0026859
Compliance Evaluation Inspection
Correspondence (PWW)

Mayor Paul McNeal and Council
Village of Oak Hill
415 N. Front Street
Oak Hill, Ohio 45656

Dear Mayor McNeal 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 OPB00055*GD and to evaluate the wastewater treatment systems performance. Mr. Dave Carpenter represented the Village during the inspection.

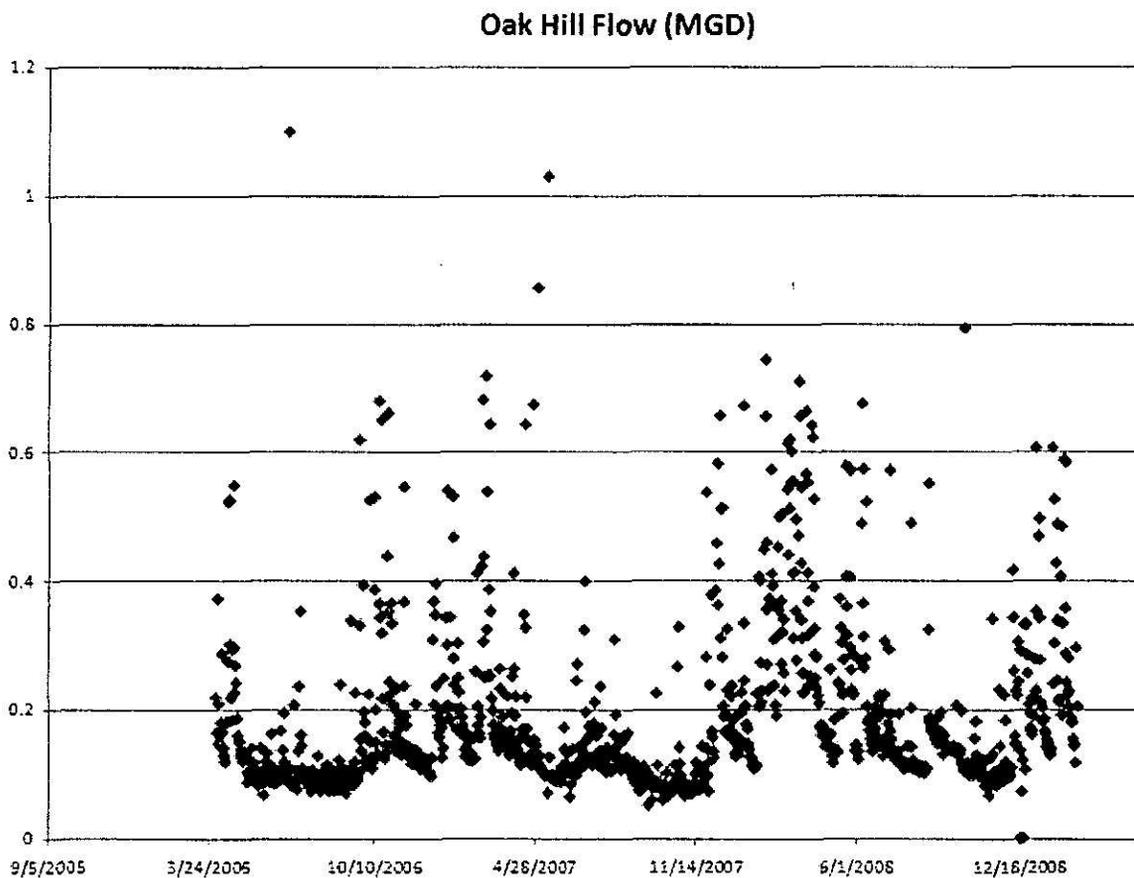
We have received self-monitoring reports covering the months of October 2008 through February 2009 for the referenced facility. Our review indicated the following violation of the conditions of your NPDES permit.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	1.51	10/14/2008
581	01148	Selenium, Total In Slu	1D Conc	100	290.	12/4/2008
001	00400	pH	1D Conc	6.5	6.4	1/7/2009
001	00400	pH	1D Conc	6.5	6.1	2/2/2009
001	00400	pH	1D Conc	6.5	6.1	2/3/2009
001	00400	pH	1D Conc	6.5	6.4	2/4/2009

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/sso%20%20day%20report%20final%2008%2004_fis.pdf

The permit requires on page 10 Part I, C. that an Inflow and Infiltration Control Plan to be submitted to the Ohio EPA, Southeast District by October 1, 2007. The Village hired Jones & Henry Engineers. A copy of the plan had been sent to the Village; the agency is still waiting on a copy. Please identify in your response to this letter a timeframe for completing the submission of the Inflow and Infiltration Control Plan. As seen in the charted data below, I&I is a relevant issue with a design flow of 0.3MGD.



Some notable ongoing maintenance included: Pump motor replacements, Blower replacement, and replacing a buried conductor.

During the inspection, a plant bypass was described to have occurred on 12-24-08. The influent pumps had failed due to a blown fuse/conductor short. The influent headworks jumped the grit channel and also overflowed the sludge basins, entering through the supernatant return.

It was raining the day of the inspection and the effluent visually appeared clear. The Village's influent is typically characteristic of a weak wastewater. The North basin has some noticeable diffuser issues with spotty distribution, and appeared dark with a heavy scum layer typical to overoxidized sludge meaning time to waste sludge, and/or scum control issues, and/or high Oil & Grease in the influent. It may be a combination of all three at the Village's WWTP.



Below is a picture of one of the clarifiers with symptoms of the same three items contributing to the dark, heavy scum layer in the aeration basin.



I strongly encourage visiting all the local users with oil and grease interceptors to inspect their maintenance practices. Another approach dealing with the condition of the treatment plant is to investigate adding scum removal controls, perhaps diverting the draw off from the clarifiers to the sludge basins.

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			

*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		

*The permit requires on page 10 Part I, C a compliance schedule that an Inflow and Infiltration Control Plan be submitted to the Ohio EPA, Southeast District by October 1, 2007. The Village hired Jones & Henry Engineers. A copy of the plan had been sent to the Village; the agency is still waiting on a copy. Flows contributed to a bypass event on 12/24/08 in connection with pump failures.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator: <u>X</u> Started every Wed.	X			
b. Adequate alarm system available for power or equipment failures (Omni-site)	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: 5 Days/Week: (1 employee)	X			
e. Operator holds unexpired license of class required by permit Class: I for Class II plant		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>called SEDO</u>	X			
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

*Operator is reportedly scheduled to take Class II test in upcoming month(s).

**RAS Pump, Influent Pump(s), Blower, and had a short in some buried conductors.

***Plant experienced a bypass event on 12/24/08.

Part 2 – Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate				X
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used				X
Conform with 40 CFR 136.3				X
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Part 3 – Laboratory, General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)				X
b. If alternate analytical procedures are used, proper approval has been obtained				X
c. Analyses being performed more frequently than required by permit	X*			
d. If (c) is yes, are results reported in permittee's self-monitoring report			X	
e. Commercial laboratory used:				
1. Parameters analyzed by commercial lab: <u>TSS, BOD, NH3, Fecals, Sludge, etc.</u>	X			
2. Lab name: <u>Stantec</u>				

*Ammonia is taken much more frequent to determine when operations need to fluctuate for sufficient air and wasting. These tests are performed by Dave and the testing procedure may not satisfy 40 CFR 136.3. Stantec data is submitted with the DMR.

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: _____ N/A _____ Satisfactory _____ Marginal _____ Unsatisfactory				

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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