



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 29, 2008

Re: Scioto County
West Portsmouth WWTP
Briarcliff Complex WWTP
Scaff-Starrett Subdiv. WWTP
Compliance Inspections
Correspondence (PWW)

Scioto County Commissioners
602 Seventh Street
Portsmouth, Ohio 45662

Dear Commissioners:

On April 16, 2008, I conducted inspections of Scioto County's West Portsmouth (OPH00010*ED), Briarcliff Complex (OPG00060*CD), and Scaff-Starrett Subdivision (OPG00046*DD) wastewater treatment plants. These inspections were performed to evaluate compliance with the Ohio Revised Code Chapter 6111 and the NPDES permits listed above. Mr. Phillip Arthur accompanied me through the West Portsmouth WWTP, and Mr. Wayne Mills accompanied me through the Briarcliff and Scaff-Starrett Subdivision WWTPs. Following are comments and violations noted for each plant:

West Portsmouth (OPH00010*ED):

The following violations and maintenance issues were noted during the inspection, and need to be addressed in a written response to this letter:

1. The headworks continues to overflow, despite a request to correct the problem in a July 28, 2006 letter. In that letter, the following violation was cited:

"The headworks screen area showed signs of recent overflows/bypasses. Debris indicative of raw wastewater was apparent on the concrete and in the grass on the slope toward the sand filters. Any such overflow constitutes a bypass and must be reported as such. Scioto County must ensure that bypasses do not occur in the future. Modifications may need to be made at this particular point in the plant, including modification of the drain to prevent plugging or the creation of a concrete or earthen berm around the screen area. Please provide, within 30 days of the date of this letter, a compliance schedule for the elimination of plant bypasses."

Observations made during the April 16, 2008 inspection indicate that this situation has not been corrected and, in fact, remains unchanged. As stated in the July 28, 2006 letter, Scioto County must report all SSOs and develop a

suitable permanent correction for this overflow point. Please provide, within 30 days of this letter, a description of measures that Scioto County will implement and a schedule for implementation, not to exceed six months.

Also, within 30 days, please provide written documentation of the cause(s) of the overflow(s), quantity of sewage that overflowed, and measures taken to eliminate the overflow(s) for all of the SSO events. Failure to report future SSO events will result in escalated enforcement action.

2. For the period beginning January 1, 2007 and ending February 29, 2008, multiple effluent limit violations for ammonia and residual chlorine were reported. For September and October 2007, 32 violations of the residual chlorine limit were reported. Please provide a written description and justification for all numeric NPDES permit violations reported for the period beginning January 1, 2007 and ending February 29, 2008.

Regarding the residual chlorine exceedances, Scioto County might consider an alternative disinfection process for the West Portsmouth WWTP in order to eliminate violations of the NPDES permit. Such alternatives could include ultraviolet or ozone systems. Please provide details of strategies or equipment modifications that will be utilized to eliminate the residual chlorine violations within 30 days of the date of this letter.

Regarding the reported ammonia limit violations, Scioto County must take action to eliminate ammonia violations during colder periods of the year. Scioto County must provide details of steps to be taken in order to eliminate these violations in the future. Please provide these details and a compliance schedule within 30 days of the date of this letter.

3. As noted during the July 2007 inspection, outflow weirs from the clarifier to the polishing pond are overgrown with algae. Scioto County must develop an acceptable maintenance schedule for this and other plant components susceptible to failure or frequent maintenance issues. Please provide details of modifications that will be made to the West Portsmouth WWTP's maintenance schedule.

Briarcliff Complex (OPG00060*CD):

The Briarcliff Complex WWTP is showing signs of deterioration, and the plant will need replacement or substantial repair in the near future.

1. The wall separating the sludge holding tank and the aeration tank is rusted through, allowing solids to enter the aeration tank. This appears to have been repaired several times in the past. Please provide a schedule for plant replacement or permanent tank repair.

2. One of the sand filters' concrete walls is deteriorated and leaking, creating a bypass of both the sand filters and chlorination system. The bypass must be eliminated immediately by replacing or rehabilitating the sand filter.

The following violations must be addressed:

1. For the period beginning January 2007 and ending March 2008, multiple violations were reported, including pH, fecal coliform, ammonia, and TSS. Please provide a detailed description of factors contributing to these violations and measures that Scioto County has taken or will take to prevent future violations.
2. As noted above, deteriorated walls on the sand filter are allowing a bypass of the sand filters and chlorination system. This is a violation of NPDES permit OPG00060*CD, Part III, Item 11. Please provide a report detailing the cause of the violation, duration of the violation, quantity of sewage bypassed, and measures that have been taken to prevent this violation from occurring in the future. Failure to immediately correct this situation will result in escalated enforcement action. Note that bypasses must be reported as required by the permit.

Scaff-Starrett Subdivision (OPG00046*DD):

The Scaff-Starrett WWTP is suffering from the effects of age as all of the other package plants under the jurisdiction of Scioto County are.

1. The plant is showing signs of deterioration to the metal tanks, though it appears that no perforation has occurred yet.
2. The interior walls of the sand filters are leaking, causing an innerconnection between filters. This condition makes it difficult to conduct required maintenance. The sand filters will require reconstruction in order to correct this problem.

The following violations must be addressed in a written response:

1. The NPDES permit for Scaff-Starrett WWTP expired May 31, 2007. Ohio EPA has no record of a renewal application being submitted. Failure to submit the application is a violation of the permit and subjects you to significant monetary penalties. Within 30 days of the date of this letter, Scioto County must submit the required renewal application for this WWTP.

2. Several ammonia, coliform, and residual chlorine violations were reported for the period beginning January 1, 2007 and ending March 31, 2008. Please provide a detailed description of factors contributing to these violations and measures that Scioto County has taken or will take to prevent future violations, within 30 days of the date of this letter.

Please provide documentation as requested for the above violations and comments. If you have any questions, please contact me at (740) 380-5447.

Sincerely,



Michael Yandrich
District Representative
Division of Surface Water

MY/dh

Enclosures

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|----------------|-----------------|-----------|---------------|
| OPG00046*DD | OH0076384 | April 16, 2008 | C | S | 1 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| Scaff-Starrett Subdivision WWTP Intersection Route 348 & 104 Portsmouth, Ohio 45662 | 12:00 p.m. | June 1, 2002 |
| | Exit Time | Permit Expiration Date |
| | 12:15 p.m. | May 31, 2007 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|-----------------|
| Wayne Mills | (740) 574-2045 |
| Name, Address and Title of Responsible Official | Phone Number |
| Scioto County Commissioners | (740) 355-8233 |

C. AREAS EVALUATED DURING INSPECTION

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

Expired permit; no renewal received. See attached inspection letter.



 Michael Yandrich, Inspector, Ohio EPA, Southeast District Office

4-29-08

 Date



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

4/29/08

 Date