



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

March 22, 2010

**Re:** Scioto County  
City of Portsmouth  
Compliance Inspection  
Correspondence (PWW)

Mayor and Council  
City of Portsmouth  
732 Second Street, P.O. Box 1304  
Portsmouth, Ohio 45662

Mayor and Council Members:

On February 17, 2010, Scott Foster and I conducted a compliance inspection at the City of Portsmouth's Lawson Run WWTP. Mr. Ernie Stickler, Tommy Stewart, and Jeff Peck represented the city and accompanied us through the plant and lab as we evaluated the Lawson Run wastewater treatment plant's compliance with the Ohio Water Pollution Control Act, Ohio Revised Code (ORC) Chapter 6111 and NPDES permit #OPD00013\*LD. During the inspection, we also reviewed deficiencies identified during the last inspection in November 2008.

As a result of observations made during the inspection, the following violations were noted:

1. **Operator Certification requirements, NPDES Permit OPD00013\*LD, Part II, A, 2 and 3:** The NPDES permit and Ohio Administrative Code (OAC) rule 3745-7-04 classify this treatment works as a Class IV facility, with minimum staffing requirements by the operator of 40 hours and five days/week.

The previous Operator of Record for the facility obtained an exemption to operate this plant with a Class III license beginning in August 2009. Prior to that time and following his termination, the Lawson Run WWTP has been out of compliance with these requirements. The lack of citation of this violation was an oversight during previous inspections.

It has been noted that the City of Portsmouth has made attempts to hire the required Class IV operator through postings at OTCO's web site. The City should aggressively continue to pursue the hiring of a Class IV operator for this plant. Continued violations may result in penalties of up to \$10,000 per violation per day.

2. **Sanitary Sewer Overflows (SSOs):** SSOs continue to be reported and observed at the Munns Run pump station. Part II, Item F of Portsmouth's NPDES

permit specifically prohibits all SSOs. Mr. Jeff Peck provided us with some information at the time of our inspection indicating that manhole relining and sewer replacement was scheduled in the near future to eliminate this illegal SSO. The City of Portsmouth must continue to make progress toward the elimination of inflow and infiltration causing this violation. Please provide a schedule indicating when work will be completed to eliminate this SSO. Continuing SSOs are subject to escalated enforcement action, including penalties of up to \$10,000 per violation per day.

3. **Back-up power supply:** In the past, the Portsmouth WWTP has been equipped with a dual-feed power supply. Recently, as discussed during the inspection, Portsmouth's power supplier disconnected the redundant power supply, leaving the plant with only one power feed. Without this dual feed system or a suitable back-up generator, the Portsmouth WWTP is in violation of NPDES permit OPD00013\*LD Part III, Item A.

It is imperative that the Portsmouth Lawson Run WWTP be supplied with adequate back-up power to allow continued operation during power outages. Please provide a schedule for restoring this secondary power supply.

In addition, the city must have equipment (generators and/or pumps) to operate all of the pump stations during a power outage.

4. **Sampling:** Portsmouth's NPDES permit, Part II, Item I, requires that composite sampling be performed on a flow-proportionate basis. Based on observations and on conversation with the plant's operators, composite effluent sampling is not being performed appropriately. Apparently, this capability has not been available over several years due to equipment/software failure.

The city of Portsmouth must repair all composite samplers to collect samples on a flow-proportionate basis. Please provide documentation that this capability has been restored at the plant.

The following items should be addressed as appropriate:

5. Lab thermometers were noted to be out of calibration by at least one year. Additionally, many of the lab chemicals utilized for testing procedures were expired. Please ensure that all lab chemicals used are not expired and that all lab equipment is calibrated as required by the manufacturer or at least once per year.

Also, Portsmouth should provide back-up test meters for all critical/permit required testing.

6. The plant's influent chart recorder was inoperable at the time of the inspection. The City of Portsmouth should repair or replace this recorder as soon as possible.

7. The concrete structure surrounding the influent chamber has suffered a great deal of erosion from combined sewer overflows. It appears that this structure may be compromised as the chamber continues to overflow during wet weather. It is recommended that Portsmouth immediately repair or rebuild this structure to prevent its failure.
8. The influent chamber coarse bar screen typically plugs with debris during high flows. Plant personnel then have to wait for water levels to subside before they can clean this bar screen. In operating the plant this way, the influent chamber level is not brought down as quickly as possible, making a subsequent overflow from additional rainfall more likely. It is recommended that Portsmouth design and install a system that will allow this bar screen to be cleaned and maintained even when influent chamber water levels are high.
9. As mentioned in the attached inspection report, the trickling filter joints continue to leak. Though past repairs have improved this situation, permanent repairs should be completed as soon as possible. It is my understating that this particular item is to be addressed in the coming year as part of a larger plant rehabilitation and improvement project.

Please provide documentation addressing all of the above violations within 30 days of the date of this letter. Failure by the City of Portsmouth to operate its wastewater treatment facility in accordance with approved permit OPD00013\*LD and all applicable laws and rules may result in substantial monetary penalties of up to \$10,000 per violation per day.

If you have any questions, please contact me at 740-380-5447.

Sincerely,

  
Michael Yandrich, P.E.  
District Representative  
Division of Surface Water

MY/jg

# NPDES Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00013*LD	OH0027197	February 17, 2010	C	S	1

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Portsmouth Wastewater Treatment Plant - Lawson Run 2040 Charles Street Portsmouth, Ohio 45662	10:30 AM	August 1, 2009
	Exit Time	Permit Expiration Date
	2:00 p.m.	January 31, 2014

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Ernie Stickler Tommy Stewart	(740) 353-0241
Name, Address and Title of Responsible Official	Phone Number
Jeff Peck, Director, Waste Water Division	

## C. AREAS EVALUATED DURING INSPECTION

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

S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated

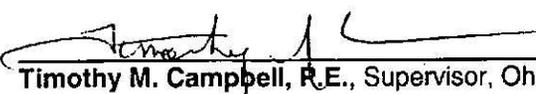
## D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See the attached inspection letter and report.

- Combined sewer overflows have been reported since the last inspection. Additional work following acceptance of the LTCP should partially address this issue. Further reductions/elimination should be pursued.
- Trickling filter joints are in need of repair, repairs made appear to have greatly reduced the amount of leakage. This filter, along with other plant operations, are scheduled for repairs and improvements in the coming year.
- At the time of the inspection, the City had failed to submit December 2009 and January 2010 e-DMRs.
- No back-up power source available at the plant.

  
Michael Yandrich, Inspector, Ohio EPA, Southeast District Office

5-22-10  
Date

  
Timothy M. Campbell, R.E., Supervisor, Ohio EPA, Southeast District Office

5/22/10  
Date

**E. PERMIT VERIFICATION**

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	X			
b. Correct name & location of receiving waters				
c. Product(s) & production rates conform with permit application (industries)			X	
d. Flows & 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 & location of discharge points are as described in permit	X			

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

**Comments:** Compliance schedule in permit to develop a LTCP for city's CSOs. LTCP was required to be completed by September 1, 2006; draft submitted September 19, 2006. USEPA is currently working with the City to resolve outstanding issues.

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: _____ 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>3</u> Days/Week: <u>7</u>	X			
e. Operator holds unexpired license of class required by permit. Class: <u>IV</u>		X		
f. Routine & preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection	X			
h. Operation & maintenance manual provided & maintained	X			
i. Any plant bypasses since last inspection	X			
j. Regulatory agency notified of bypasses: _____ on MORS <u>X</u> 800 No.	X			
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

**Comments:** Continuing bypass/CSOs during several rainfall events per month. Alarms provided for wet well level, influent pump, influent level, bar screen, grit chamber, chlorine, secondary level, sludge level, blower operation. No standby power available. No ORC meeting minimum staffing requirements.

Collection System	YES	NO	N/A	N/E
a. Percent combined system: <u>50</u> %	X			
b. Any collection system overflows since last inspection: CSO <u>X</u> SSO: <u>    </u>	X			
c. Regulatory agency notified of overflow (SSOs)	X			
d. CSO O&M plan provided and implemented				X
e. DSOs 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:** Munns Run continuing to experience SSOs at the Munns Run Left Station due to I/I.

## H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: <u>Landfill</u>	X			
b. If sludge is incinerated, where is ash disposed of?				
c. Is sludge disposal contracted? Name: <u>Pike Sanitation</u>	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)	X			

**Comments:** Sludge Management Plan Submitted Date: 11/16/89  
ATAD system has been completed and is currently in service. Sludge generation volumes significantly reduced with ATAD use.

## 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>    </u> ultrasonic & parshall flume <u>    </u> calculated from influent <u>    </u> weir <u>    </u> other <u>X</u> ultrasonic & weir      specify: <u>    </u>				
b. Calibration frequency adequate. Date of last calibration: <u>Unknown</u>		X		
c. Secondary instruments (totalizers, recorders, etc.) properly operated & 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 <u>    </u> Monthly <u>    </u> Weekly <u>    </u> Other				



**K. MULTIMEDIA OBSERVATIONS**

Collection System	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?