



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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www.epa.state.oh.us

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

September 30, 2010

Re: Tuscarawas County
Kerr Allotment WWTP
Compliance Evaluation Inspection
Correspondence (PWW)

Tuscarawas County Commissioners
125 East High Avenue
New Philadelphia, Ohio 44663

Dear Commissioners:

On September 22, 2010, I conducted a compliance evaluation inspection at the Kerr Allotment Wastewater Treatment Plant. The purpose of the inspection was to determine compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number OPG00031*ED and to evaluate wastewater treatment plant performance. The facility was found to be in non-compliance. Mr. Justin Angel, Mr. Eric Maurer, Mr. David Festi, and Mr. Scott McCreery were present during the evaluation.

As a result of my inspection, I have the following comments:

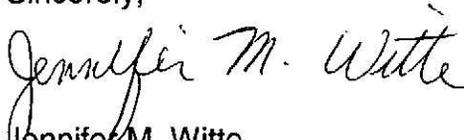
- The grease/trash trap is cleaned out every six months and hauled to the Village of Strasburg for disposal.
- The grates on the aeration tanks are rotting, developing holes and becoming unsafe. These grates need to be replaced to ensure operator safety.
- The mixed liquor in the aeration tanks was brown to gray in color. In addition, there was a slight septic odor. Sludge is wasted when the spins yield five percent. I understand last week the spins yielded three percent.
- Sludge is wasted from aeration basin two and is hauled to the Wilkshire Hills WWTP for disposal.
- There was a significant amount of sludge and scum on the water surface at the influent baffle in the clarifier. In addition, there was a moderate amount of sludge and scum on the water surface in the main portion of the clarifier.

- The surface skimmer in the clarifier has rotted, fallen off and no longer used. As a result the sludge and scum on the surface of the clarifier cannot be returned to the head of the plant for treatment. It will be necessary to replace the surface skimmer. In addition, staff should manually remove the material on the water surface in the clarifier until the skimmer can be replaced. Sludge from the clarifier is returned to aeration basin one.
- The baffles in the clarifier are corroding and developing hairline cracks. In addition, the concrete in the clarifier walls is pitting.
- The flow meter was last calibrated November 3, 2009. I understand the flow meters are scheduled to be recalibrated on November 4, 2010.
- At the time of my inspection, the ultraviolet disinfection was in operation. Disinfection is required May 1 through October 31 each calendar year. I understand the UV bulbs are removed during the winter and are stored at the Wilkshire Hills WWTP. The final effluent is aerated prior to discharging to the receiving stream. The chlorine residual monitoring will be removed from the permit during the renewal process.
- At the time of my inspection, the final effluent discharging to the receiving stream was gray in color. I understand the drain on the UV bulbs was pulled and flushed the morning of my inspection. When the drain on the bulbs is cleaned, it will be necessary to return the wastewater back to the head of the plant rather than discharging it to the receiving stream.
- Please be aware Part III, Item 3(A) of the permit states, "At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."
- The stream bank continues to erode towards the wastewater treatment plant. In addition, there is evidence that the wastewater treatment tanks are shifting and separating from each other.
- A review of the monthly operating data reveals during wet weather periods flows to the plant increase from 3000-4000 gallons per day to 7000-20,000 gallons per day. I understand the sewers in this area cannot be videoed due to the size of the sewers. I recommend the sewer district conduct smoke testing in this area to determine if there are downspouts, sump pumps, footer drains, etc. connected to the collection system. It may be necessary to hire an independent firm to locate the sources of inflow and infiltration in the collection system.

- A review of your permit reveals an annual Sanitary Sewer Overflow Report is to be submitted by March 31 of each calendar year. Please be advised that an annual report was to be submitted for 2007, 2008 and 2009. To date we have not received these reports. We will expect them without further delay. I have enclosed the appropriate form for your use.
- The NPDES permit for the facility expires on March 31, 2011. A renewal application is due no later than October 2, 2010. Please be aware Ohio Administrative Code 3745-33-03(B) states "If a permit renewal application is submitted at least one hundred eighty days prior to the expiration date of the existing permit, and the director does not issue a new permit before the expiration date, the conditions of the expired permit shall continue in force until the director acts on the permit application."
- Please be aware the new permit will require the sewer district to meet E. coli limits (126 #/100 ml for 30-day average and 284 #/100ml for 7-day average) rather than fecal coliform limits. The permit renewal will include one monitoring season for E.coli, however, the sewer will district will be required to continue meeting fecal coliform limits during that season.
- At the time of my inspection, the outfall sign was in place in accordance with OAC 3745-33-08 (12)(a-d) which became effective on December 1, 2006. The renewal permit will include language to maintain this sign.

The sewer district must continue to make immediate efforts to return the facility to compliance. Marginal and unsatisfactory ratings were given due to the issues mentioned in this letter. A copy of our completed inspection report is enclosed. Please submit a written response to the aforementioned comments within thirty (30) days of receipt of this letter. The assistance and cooperation received during the inspection are appreciated. If you have any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte
Chemical Engineer – Environmental Specialist II
Division of Surface Water

JMW/dh

Enclosure

- c: Charles Regula, Sanitary Engineer, Tuscarawas County Metropolitan Sewer District
- c: Ed Wilson, Superintendent, Tuscarawas County Metropolitan Sewer District

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PG00031*ED	OH0048437	Sept. 22, 2010	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Kerr Allotment WWTP County Road 69 Goshen Township, Ohio 44663	10:15 am	April 1, 2006
	Exit Time	Permit Expiration Date
	11:15 am	March 31, 2011

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Justin Angel Eric Maurer David Festi Scott McCreery	(330) 874-3262
Name, Address, & Title of Responsible Official	Phone Number
Tuscarawas County Commissioners 125 East High Avenue New Philadelphia, Ohio 44663	(330) 365-3240

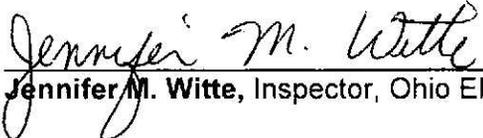
C. AREAS EVALUATED DURING INSPECTION

<u>M</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>M</u> Records/Reports	<u>S</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>U</u> Operations & Maintenance	<u>U</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>M</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; N/A = Not Applicable)

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

See attached letter.



 Jennifer M. Witte, Inspector, Ohio EPA, Southeast District Office

9/30/10

 Date

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

 Date