



State of Ohio Environmental Protection Agency

Southeast District Office

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

May 20, 2009

Re: Tuscarawas County
Mineral City WWTP
Compliance Evaluation Inspection
Correspondence (PWW)

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

Dear Commissioners:

On May 6, 2008, I conducted a compliance evaluation inspection at the Mineral City 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 0PB00053*ED, to evaluate wastewater treatment plant performance and to prepare for your permit renewal. The facility was found to be in marginal compliance. Mr. Jack Shalosky was present during the evaluation. Our inspection findings are summarized below.

As a result of the inspection, I have three (3) main issues that deserve the Commissioner's immediate attention.

- Staffing of the Mineral City WWTP
- Sludge handling at the Mineral City WWTP;
- Operational controls at the Mineral City WWTP.

Staffing of the Mineral City WWTP:

1. The renewal permit which became effective on March 1, 2009 changes the plant classification from a Class II facility to a Class I facility. Ohio Administrative Code (OAC) 3745-7-04(C) states, "The operator of record of a Class I facility shall at a minimum, be physically present at the treatment works and fulfill the time requirements of 3 days per week for a minimum of 1.5 hours per week." The staffing requirement of three days per week for a minimum of 1.5 hours per week is currently not being met at the Mineral City plant. As a result preventative preventative operation and maintenance cannot be accomplished at this facility. Be advised 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..."

2. Please be advised Ohio Administrative Code 3745-7-04(B)(1)(a) states "Each sewerage system that is tributary to a class I treatment works shall be classified as a class I sewerage system." Please be aware there are no licensed operators currently on the sewer crew. Please inform this office how the sewer district intends to handle the staffing issue. Please review OAC 3745-7-04(C) and Part III, Item 3(A) of the permit as set forth in Item 1 above.
3. Ohio Administrative Code 3745-7-09 outlines the recordkeeping requirements and responsibilities of a certified operator. A review of the operator log books indicates all of the requirements are not being completed. At the time of my inspection, the operator stated this was not being met due to inadequate staffing. Please explain how OAC 3745-7-09 is currently being addressed. In addition, laboratory testing for each county operated wastewater treatment plant is completed at the Wilkshire Hills facility. No laboratory testing can be considered for the minimum staffing at the Mineral City plant as outlined in OAC 3745-7-04(C) since testing is completed at the Wilkshire Hills plant.

Sludge handling at the Mineral City WWTP:

1. Sludge removed from the plant is hauled to the Sandyville wastewater treatment plant for disposal. During times of inadequate staffing or inclement weather, excess sludge is stored in the wastewater treatment system rather than being removed. At the time of my inspection, the mixed liquor suspended solids (MLSS) content was over 4,400 mg/l. The operator stated the MLSS is normally kept at 1,300 mg/l.
2. Please be aware that Ohio Administrative Code 3745-40-04 (T) states: "Facility storage of sewage sludge shall be provided by the permittee such that there shall be no adverse effects from sewage sludge handling at the permittee's treatment works. Facility storage of sewage sludge shall consist of one hundred twenty days sewage sludge storage for the design capacity of the treatment works. Facility storage of sewage sludge may consist of any combination of additional volume in sludge stabilization units (digesters), separate tanks, sewage sludge treatment lagoons, drying beds, dewatered sewage sludge storage pad areas, or other means to store either liquid or dewatered sewage sludge..."

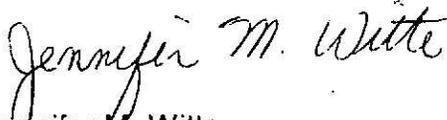
Until adequate sludge handling facilities can be installed, it will be necessary to haul sludge from the Mineral City plant to another local wastewater treatment plant for treatment and disposal. The sewer district may also consider hiring an independent firm to press the sludge and have it hauled to a landfill for disposal. Please inform this office how the sewer district plans to handle the sludge problems and comply with OAC 3745-40-04(T).

Operational controls at the Mineral City WWTP:

- Flow meters must be calibrated annually by a certified technician. At the time of my inspection, I was informed the flow meters had not been calibrated since July 2005. The flow meter must be calibrated by an independent firm without further delay.
- The stream bank around your outfall has eroded significantly and should be inspected to determine what work needs to be completed in order to ensure operator safety.
- At the time of my inspection, upgrades to the Mineral City WWTP were under construction. Improvements include grit removal, preliminary screening and new clarifiers. At the completion of this project, it will be imperative for the sewer district to have adequate preventative operation and maintenance completed at the plant.
- New sewer lines have been extended to areas not currently being served. In addition, some of the existing lines have been replaced and some have been relined to address inflow and infiltration problems in the collection system.
- I understand there have been some grease problems at the wastewater treatment plant. Currently, grease traps are not inspected nor are there enforcement programs within the village. It will be necessary for the sewer district to set-up a program to control grease entering the wastewater treatment plant. I recommend the sewer district contact the Tuscarawas County Health Department regarding the bakery and restaurant located in the village limits.
- An updated Operation and Maintenance Manual must be submitted at the completion of construction. Please review the letter from the Division of Environmental and Financial Assistance dated October 4, 2007.
- The average annual residential sewer rate in the state of Ohio for 2007 was \$466. A review of your average annual residential sewer rate for 2007 reveals the residents were charged \$374. This is a substantial difference in rates, which does not allow the county to budget for improvements that are currently needed or will be needed in the future. I strongly encourage the county to reevaluate their sewer rates. For additional comparisons, please see the 2007 Sewer and Water Rate Survey at the following link: http://www.epa.state.oh.us/ofa/rate_survey.html.

A copy of our completed inspection report is enclosed. Please submit a written response to the aforementioned comments within **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: Tuscarawas County Health Department

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPB00053*ED	OH0021504	May 6, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Mineral City WWTP Lindentree Road Mineral City, Ohio	1:30 p.m.	November 1, 2000
	Exit Time	Permit Expiration Date
	2:30 p.m.	October 31, 2005

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jack Shalosky, Operator	(330) 874-3262
Name, Address and 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>S</u> Permit	<u>M</u> Flow Measurement	-- Pretreatment
<u>M</u> Records/Reports	<u>S</u> Laboratory	-- 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>U</u> Sludge Storage/Disposal	-- Other
<u>M</u> Collection System		

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

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

See attached letter

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

5/21/09
Date

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

5/22/09
Date

F. GUIDE – VISUAL OBSERVATION – UNIT PROCESS

OMB No. 158-R0035

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	M	Plant upgrades under construction
	Buildings	M	Plant upgrades under construction
	Potable Water Supply Prot.	S	Village supplied
	Safety Features	M	Plant upgrades under construction; new railings will be installed
	Bypasses	--	
	Stormwater Overflows	--	
	Alternate Power Source	OUT	Generator – operates one blower
Preliminary	Maintenance of Collection Systems	S	New sewer lines extended to areas, lines relined and replaced
	Pump Station	S	
	Ventilation	S	
	Bar Screen	IN	Coarse; rags needed to be removed
	Disposal of Screenings	S	Landfilled
	Comminutor	IN	1 unit; not operating properly
	Grit Chamber	OUT	1 unit; new unit being installed
	Disposal of Grit	OUT	Landfilled
Primary	Settling Tanks	--	
	Scum Removal	--	
	Sludge Removal	--	
	Effluent	--	
Sludge Disposal	Digesters	--	
	Temperature and pH	--	
	Gas Production	--	
	Heating Equipment	--	
	Sludge Pumps	--	
	Drying Beds	OUT	Removed during upgrades
	Vacuum Filter	--	
	Disposal of Sludge	U	Taken to Sandyville WWTP
Other	Flow Meter and Recorder	U	Has not been calibrated since July 2005
	Records	S	
	Lab Controls	S	
	Chemical Treatment	S	
Secondary Tertiary (list items as required)	Blowers	IN	3 units
	Influent Sampler	U	Time proportioned; thermometer in place
	Effluent Sampler	S	Flow proportioned; thermometer in place
	Clarifiers	IN	Substantial amount of pin floc; baffles being installed in 2 units
	Aeration Tanks	IN	2 units
Disinfection	Effluent	S	Visually clear
	Disinfection System	S	UV disinfection – cleaned with acid 1/month
	Effective Dosage	--	
	Contact Time	S	
	Contact Tank	--	
	Dechlorination	--	