



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

September 18, 2008

**Re:** Tuscarawas County  
City of New Philadelphia WWTP  
Compliance Evaluation Inspection  
Correspondence (PWW)

Mayor and Council  
City of New Philadelphia  
150 East High Avenue  
New Philadelphia, Ohio 44663

Dear Mayor and Council:

On March 18, 2008, I conducted a compliance evaluation inspection at the New Philadelphia 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 OPD00012\*ND and to evaluate wastewater treatment plant performance. The wastewater treatment plant was found to be in substantial compliance with the permit. Mr. Jim Dinger, Mr. Aaron Hixenbaugh, Mr. Bill Seibold and Mr. Mike Scolati were present during the evaluation.

The final effluent discharging to the Tuscarawas River was visually clear. No effluent samples were collected. At the time of my inspection, all treatment units, except for the muffin monster, two (2) raw sewage pumps and UV disinfection, were in operation. As a result of the inspection, I have the following comments.

1. As stated in previous inspection letters, I remain concerned that there are no stairs or landing available for employees to access the grease removal equipment. Employees have to use the traveling scraper to complete daily operation and maintenance activities on this equipment. This is a safety issue that needs to be addressed by the city. In a letter dated January 4, 2006, it was stated "at this time no money has been budgeted towards this project." Please inform this office when this project will become a priority for the city. In addition, I understand the operators need to ensure that no ice or snow accumulates on the walls of the grit/grease removal. If half an inch of precipitation accumulates on the walls the traveling conveyor cannot operate. I recommend the city investigate roofing this area to ensure proper operation of the equipment.
2. The muffin monster has been out of service for some time now. I understand the city has an estimate of \$18,000 to fix the treatment unit. It will be necessary for the city to repair this unit and place it back into operation. Please inform this office when the repairs to this unit will be completed. Please be aware that Part III, Item 3(A) of your 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 terms and conditions of this permit... This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit."

3. The wastewater treatment plant continues to receive excess flows (an additional 1 MG to 2 MG during rainfall events), because the sewer system is impacted by inflow/infiltration (I/I). At the time of my inspection, there were high flows entering the head works of the plant. It is important for the city to continue looking for problems in the collection and remedying these problems as they are located. Excess flows result in unnecessary treatment costs and excess wear and tear on treatment equipment.
4. Mr. Bill Seibold's letter dated January 9, 2006 stated the sewer connection in the manhole at 1375 Terrace Road N.W. was to be rechecked during a heavy rain event to see if the connection was storm water or sanitary sewage. There is no documentation in my file stating if a decision was ever reached. Please inform this office on the status of this connection.
5. Mr. Seibold's January 9, 2006 letter states that the four (4) septic systems in Section 23 and twenty-three (23) septic systems in Section 26 were not a priority in 2005. However, the City Service Director was going to work with the City Law Director and formulate a plan of action for the first quarter of 2006. No additional information has been provided to this office regarding these septic systems. Please inform this office what steps have been taken by the city.
6. In my inspection letter dated December 1, 2005, I stated on page two (2) that problem six (6) in Section 7 was at one point buried under four feet of soil due to on-going construction, but would be taken care of when construction was completed. Has this problem been taken care of to date?
7. I was informed in September 2004 and January 2006 that the city was going to begin enforcing their sewer use ordinance to check for foundation drains connected to the sanitary sewer system in the Schoenbrunn Estates area. Has the city ever followed through with their inflow/infiltration work in this area? To date no addition information has been provided on this subject.
8. In a letter dated September 13, 2001, I informed the city that they had not constructed a roof over the concrete containment pad at the city's general service garage located at 1234 Commercial Avenue, S.E. as required by the November 10, 1999 Permit to Install (PTI) approval. In this letter, I requested the city submit a schedule of compliance indicating when the roof would be installed

and the bypass sewer and valve would be eliminated. I received a letter dated June 25, 2001 from your consultant Civil Design Associates, Inc. recommending the city work with Ohio EPA to resolve the outstanding issue. A review of your file reveals there is no closure on this issue. Mr. Seibold's January 9, 2006 letter stated the drain on the containment pad would be cemented shut, and that photo documentation would be provided when the project was completed. To date no photos have been submitted. Please inform this office on the status of this project.

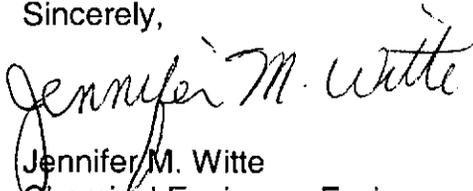
9. There have been a few fecal coliform, oil and grease and pH violations since the last inspection. In addition, US EPA DMR-QA Study 25 and 26 reported five parameters as not acceptable and five parameters to be checked for error. Part III, Item 3(A) of your permit states,

“...Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures...”

10. Please inform this office how the restaurant grease trap inspection program has been going? How many sewer users have been connected to the sewer line along Stone Creek Road? How many sewer users still need to be connected to the sewer line along Stone Creek Road?
11. Your NPDES permit has been recently modified to reclassify the plant from a Class IV facility to a Class III facility. Please be reminded that the minimum staffing requirements at the plant must be met no later than September 1, 2008. In addition, log books must be maintained in accordance with Ohio Administrative Code 3745-7-09.
12. Part II, Item X of your newly modified NPDES permit requires that a sign be placed at outfall 001 on the Tuscarawas River no later than November 1, 2008.
13. Please provide a copy of your U.S. EPA quality assurance performance sampling results for Study 27 and Study 28.
14. The average annual residential sewer rate in the state of Ohio for 2006 was \$442. A review of your average annual residential sewer rate for 2006 reveals the city charged \$294. This is a substantial difference in rates, which does not allow the city to budget for improvements that are currently needed or will be needed in the future. I strongly encourage the city to reevaluate their sewer rates. For additional comparisons, please see the 2006 Sewer and Water Rate Survey at the following link: [http://www.epa.state.oh.us/ofa/rate\\_survey.html](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 regarding this letter, please contact me at (740) 380-5206.

Sincerely,



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

JMW/dh

Enclosure

- c: Aaron Hixenbaugh, Superintendent, New Philadelphia WWTP
- c: Jim Ullis, New Philadelphia Health Department

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00012*ND	OH0026727	March 18, 2008	C	S	1

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
New Philadelphia WWTP 1422 Delaware Drive New Philadelphia, Ohio 44663	10:30 a.m.	August 1, 2005
	Exit Time	Permit Expiration Date
	1:30 p.m.	January 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Aaron Hixenbaugh, Superintendent Jim Dinger, Superintendent Bill Seibold, Assistant Superintendent Mike Scolati, Assistant Superintendent	(330) 339-3573
Name, Address and Title of Responsible Official	Phone Number
Aaron Hixenbaugh, Superintendent 150 East High Avenue New Philadelphia, Ohio 44663	(330) 339-3573

**C. AREAS EVALUATED DURING INSPECTION**

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

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

9/23/08  
Date

9/24/08  
Date

**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			

Comments:

**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>	X			
e. Permittee is meeting compliance schedule	X			

Comments:

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> 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: # of shifts <u>3</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: <u>III</u>	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: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

Comments: (c) The muffin monster is out of service  
 (e) Jim Dinger retired March 28, 2008. The permit was reclassified from a Class IV to a Class III facility.  
 (h) A new operation and maintenance manual has been submitted.  
 (k) Flows to WWTP increase during wet weather events. Flows increase an additional 1.5-2.0 MGD.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: 0%				
b. Any collection system overflows since last inspection (CSO ____ SSO ____)		X		
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs 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:** (f) Portable pumps only used to bypass between manholes, not to waterways.  
(g) Lift stations are equipped with lights and are monitored with the new SCADA system.  
(h) Honey Valley is the only pump station that is equipped with a permanent standby generator. Portable pumps and a portable generator can be used in emergencies.  
(i) I/I is a major problem. The city needs to continue investigating sources of I/I.  
(k) During heavy rainfall events, portions of the sewer are overloaded. The city has relined the sewer in Shel Mar Estates and has relined the sewer line from the mall to the WWTP.

## H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): 12/02/02 Submitted Date  
\_\_\_\_ Approval Number  
\_\_\_\_ Not submitted  
\_\_\_\_ N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current	X			
c. Sludge adequately disposed (Method: <u>Landfill</u> )	X			
d. If sludge is incinerated, where is ash disposed of? _____			X	
e. Is sludge disposal contracted (Name: <u>Agri-Sludge*</u> )	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

**Comments:** \*Agri-Sludge land applies sludge, if needed, for the city.





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	S	
	Buildings	S	
	Potable Water Supply Prot.	S	CITY
	Safety Features	S	
	Bypasses	--	
	Stormwater Overflows	--	
	Alternate Power Source	OUT	GENERATOR; RAN ONCE PER WEEK
Preliminary	Maintenance of Collection Systems	M	THERE ARE MANY SOURCES OF INFLOW/INFILTRATION
	Pump Station	IN	17 UNITS
	Ventilation	S	
	Coarse Screen/Fine Screen	IN	2 NEW UNITS; ONE COARSE AND ONE FINE
	Disposal of Screenings	S	LANDFILLED
	Channel Monster	OUT	1 UNIT – FAILED
	Grit Chamber	IN	1 UNIT; DEFECTS HAVE BEEN WORKED OUT
	Disposal of Grit/Grease	S	LANDFILLED; COLLECTED IN WHEEL BARRELS
	Raw Sewage Pumps	IN	4 UNITS (2200 GPM); TWO OUT FOR REPAIR
	Grease Removal	IN	1 UNIT; DEFECTS HAVE BEEN WORKED OUT
Primary	Settling Tanks	IN	3 UNITS; 2 OFF-LINE BECAUSE OF I/I DILUTION
	Scum Removal	S	TO DIGESTER
	Sludge Removal	S	SLUDGE IS DRAWN OFF EVERY 9-12 MIN. PER HOUR; FLOW PROPORTIONED
	Effluent	S	LIGHT GRAY
	Sludge Pumps	OUT	2 UNITS
Sludge Disposal	Digesters	IN	3 AEROBIC UNITS OPERATED IN SERIES
	Sludge Pumps	IN	
	Vacuum Filter	--	
	Disposal of Sludge	S	LANDFILLED
	Sludge Press	OUT	1 UNIT; USED 3-4 DAYS EVERY 2 WEEKS
	Septage Receiving	IN	RECEIVE 1-2 TRUCKS PER WEEK; GREASE TRAPS HAULED TO CANTON
	Waste Tank (Sludge)	IN	1 UNIT
Other	Flow Meter and Recorder	U	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	S	
Secondary Tertiary (list items as required)	Aeration Tanks	IN	4 UNITS; (3 UNITS IN SERVICE); FINE AIR; ONE BEING USED FOR SLUDGE
	Secondary Clarifiers	IN	3 UNITS; SLUDGE & SCUM ON SURFACE (1 UNIT OUT OF SERVICE)
	Blowers	IN	11 UNITS
	Manhole at Outfall	U	FIX OR ELIMINATE UNIT
Disinfection	Effluent	S	VISUALLY CLEAR / NO THERMOMETER
	Ultraviolet Disinfection	OUT	1 UNIT
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
	Dechlorination	--	