



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
Sandyville-East Sparta 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 Sandyville-East Sparta 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 0PJ00007*GD, to evaluate wastewater treatment plant performance and to prepare for your permit renewal. The facility was found to be in non-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 Sandyville-East Sparta WWTP
- Sludge handling at the Sandyville-East Sparta WWTP
- Operational controls at the Sandyville-East Sparta WWTP

Staffing of the Sandyville-East Sparta WWTP:

1. The renewal permit which became effective on March 1, 2009 includes the new certified operator language. Ohio Administrative Code (OAC) 3745-7-04(C) states, "The operator of record of a Class II facility shall at a minimum, be physically present at the treatment works and fulfill the time requirements of 5 days per week for a minimum of 20 hours per week." The staffing requirement of five days per week for a minimum of 20 hours per week is currently not being met at the Sandyville-East Sparta plant. As a result, preventative operation and maintenance cannot be accomplished at this facility. Be advised that 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 II, III, or IV treatment works shall be classified as a class II 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 Sandyville-East Sparta plant as outlined in OAC 3745-7-04(C) since testing is completed at the Wilkshire Hills plant.

Sludge handling at the Sandyville-East Sparta WWTP:

1. Sludge removed from this facility is land applied. During times of inadequate staffing or inclement weather, excess sludge is stored in the wastewater treatment system for extended periods of time (6-18 months at times) rather than being removed. At the time of my inspection, the mixed liquor suspended solids (MLSS) content in the system was 4,500 mg/l. The operator stated the MLSS is normally kept at 1,300 mg/l.
2. At the time of my inspection, one of the aeration tanks was off-line and was being used for sludge storage. 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 Sandyville-East Sparta 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 OAC3745-40-04(T).

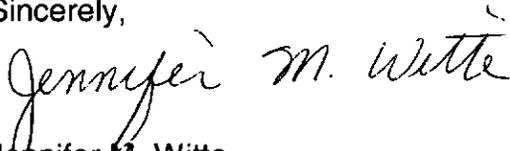
Operational controls at the Sandyville-East Sparta WWTP:

- The generator supplies electricity to the main building, but not to the wastewater treatment equipment. Please be aware Part III, Item 3A of the permit states "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." In addition, 'The Recommended Standards for Wastewater Facilities', Section 56.11 states "All plants shall be provided with an alternate source of electric power or pumping capability to allow continuity of operation during power failures." Please inform this office how the sewer district plans to provide an alternate power source to this facility.
- 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 January 2006. The flow meters must be calibrated by an independent firm without further delay.
- At the time of my inspection the refrigeration unit in the influent composite sampler was not in operation. Samples were not being collected in accordance with 40 CFR 136.3 which requires samples to be kept at 4°C during sample collection. Please be aware Part III, Item 3A of the permit states "Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures."
- At the time of my inspection, the clarifier weirs needed to be cleaned. I was informed this process is usually completed weekly. In addition, new baffles need to be installed in the clarifiers.
- At the time of my inspection, there was a significant quantity of scum on the surface of the clarifiers. The scum tube is in need of repair, since it no longer operates as designed. The return activated sludge and scum should be combined and returned to the oxidation ditches for treatment.
- One of the blowers was tripped the day before the inspection. At the time of the inspection, the blower was not in operation.
- The windows in the operations building are rotting and need to be replaced. Please inform this office how you intend to address the above issues and comply with the terms of the NPDES permit.
- A review of the 2008 flow data reveals there are issues with inflow/infiltration in the collection system. It is important for the sewer district to look for problems in the collection system and remedy the problems as they are located. I have enclosed four (4) graphs showing how rainfall affects the flows at the wastewater treatment plant for your review. Please inform this office how the sewer district plans to address this issue.

- On February 5, 2008, there was a break in one of the force mains. Approximately 200,000 to 250,000 gallons of sewage was bypassed from the collection system. Part III, Item 1 of the permit defines a bypass as the intentional diversion of waste streams from any portion of the treatment facility. Bypassing or diverting of wastewater from the treatment works is prohibited unless it meets the criteria in Part III, Items 11 and 12 of the permit. Please review these sections of your permit.
- It will be necessary to install steps leading to the receiving stream. In addition, it will be necessary to remove the poison ivy growing on the fence.
- 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 Eng., Tuscarawas Co. Metropolitan Sewer Dist.
c: Tuscarawas County Health Department

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PJ00007*GD	OH0048615	May 6, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Sandyville-East Sparta WWTP County Road 82 Sandy Township, Ohio	12:15 p.m.	May 1, 2003
	Exit Time	Permit Expiration Date
	1:15 p.m.	April 30, 2008

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

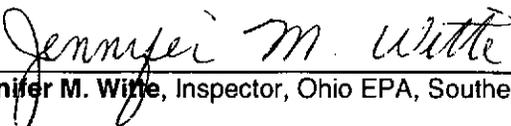
C. AREAS EVALUATED DURING INSPECTION

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



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

5/21/09

Date



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	Tree fell on fence; allows access to intruders
	Buildings	M	Windows need replaced
	Potable Water Supply Prot.	S	
	Safety Features	U	Tree fell on fence; allows access to intruders
	Bypasses	M	
	Stormwater Overflows	--	
	Alternate Power Source	U	Generator only provides power to building not equipment
Preliminary	Maintenance of Collection Systems	U	Inflow/Infiltration problems; grit problems
	Pump Station	IN	2 units have problems with grit
	Ventilation	S	
	Bar Screen	--	
	Disposal of Screenings	--	
	Comminutor	--	
	Grit Chamber	--	
	Disposal of Grit	--	
Primary	Settling Tanks	--	
	Scum Removal	--	
	Sludge Removal	--	
	Effluent	--	
Sludge Disposal	Digesters	IN	1 unit; full and needed to be cleaned out
	Temperature and pH	--	
	Gas Production	--	
	Heating Equipment	--	
	Sludge Pumps	S	
	Drying Beds	--	
	Vacuum Filter	--	
	Disposal of Sludge	U	Excessive solids being stored in facility
Other	Flow Meter and Recorder	U	Last calibration was January 2006
	Records	M	
	Lab Controls	M	Not icing influent samples
	Chemical Treatment	S	
Secondary Tertiary (list items as required)	Oxidation Ditches	IN	2 units; 1 unit being used for sludge storage
	Influent Sampler	U	Time proportioned; refrigeration unit failed
	Blower	IN	2 units; 1 unit went off-line and has not been repaired
	Final Clarifiers	IN	2 units
Disinfection	Effluent	S	
	Disinfection System	IN	Chlorine visually clear; need steps to outfall
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	IN	2 units; 1 unit off-line; unit has needed cleaned for 1 year
	Dechlorination	IN	Sulfur dioxide