



State of Ohio Environmental Protection Agency

Southeast District Office

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

May 19, 2009

Re: Tuscarawas County
Wilkshire Hills 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 Wilkshire Hills 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 0PJ00008*FD, to evaluate wastewater treatment plant performance and to prepare for your permit renewal. The facility was found to be in non-compliance. Mr. Charles Regula and Mr. Jack Shalosky were 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 Wilkshire Hills WWTP;
- Sludge handling at the Wilkshire Hills WWTP;
- Operational controls at the Wilkshire Hills WWTP.

Staffing of the Wilkshire Hills WWTP:

1. The renewal permit which became effective on August 1, 2008 changes the plant classification from a Class III facility to a Class II facility. 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." Part II, Item A(4)(a) requires the minimum staffing requirements shall be met no later than August 1, 2009. The staffing requirement of five days per week for a minimum of 20 hours per week is currently not being met at the Wilkshire Hills 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." Part II, Item A(4)(a) of the NPDES permit requires the minimum staffing requirements be met no later than August 1, 2009. 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 (OAC) 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. The only laboratory testing that can be considered for the minimum staffing requirements outlined in OAC 3745-7-04(C) at this facility is for testing for the Wilkshire Hills permit. Minimum staffing for testing at the other three (3) facilities may only be considered if the testing is conducted at the actual treatment facility.

Sludge handling at the Wilkshire Hills WWTP:

1. At the time of my inspection, sludge was observed in the unnamed tributary of the Tuscarawas River and as far downstream as we walked. Please be advised that this is a violation of Part III, Item 2A of the permit.

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 rather than being removed. At the time of my inspection, the mixed liquor suspended solids (MLSS) content in the system was 5,500 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..."

3. Until adequate sludge handling facilities can be installed, it will be necessary to haul sludge from the Wilkshire Hills 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).

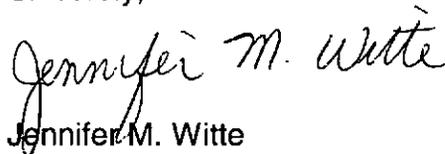
Operational controls at the Wilkshire Hills WWTP:

- Flow meters must be calibrated annually by a certified technician. At the time of my inspection, I was informed the influent flow meter had not been calibrated since July 2005. The flow meter **must** be calibrated by an independent firm without further delay.
- At the time of my inspection, I was informed there is no longer an effluent flow meter. 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..." An effluent flow meter is needed in order to calculate the loading limits in your NPDES permit. The sewer district must take action to immediately replace the effluent flow meter.
- There currently is no influent composite sampler. Part II, Item E states "Composite samples shall be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the sewage flow rate at the time of sampling. Such samples shall be collected at such times and locations, and in such a fashion, as to be representative of the facility's overall performance." It will be necessary for the sewer district to purchase an influent composite sampler to comply with this requirement of the permit. In addition, this new unit needs to be hooked up to the influent flow meter in order to collect samples in accordance with the permit.
- The effluent composite sampler collects flow proportioned samples using the influent flow meter rather than the effluent flow meter. It will be necessary to replace or repair the effluent flow meter and connect it to the effluent sampler to comply with the permit conditions. Part III, Item 3A 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..."
- At the time of my inspection, the clarifier weirs needed to be cleaned. I was informed this process is usually completed weekly.

- A harness wire has been installed on the clarifiers. In addition, a new rubber sweep on the rake arm needs to be installed on the north clarifier. Lastly, the two (2) old clarifiers need to be cleaned out. There is sludge being stored in the bottom of these units. I understand the sewer district has considered converting these two tanks into sludge digesters.
- The controllers in the dialer system which are located in the electrical panel for the raw pumps at the head of the plant are having problems restarting. Please inform this office how the sewer district plans to address this problem.
- The building housing the blowers is rotting. The roof needs repair and the siding needs to be addressed. In addition, the door for the chlorine building needs to be replaced. 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.
- 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.

The sewer district must take 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 **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
OPJ00008*FD	OH0076261	May 6, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Wilkshire Hills WWTP 9962 Wilkshire Blvd. Bolivar, Ohio	10:30 a.m.	May 1, 2003
	Exit Time	Permit Expiration Date
	11:30 a.m.	April 30, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Charles Regula 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>U</u> Flow Measurement	<u>--</u> Pretreatment
<u>M</u> Records/Reports	<u>M</u> Laboratory	<u>--</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>U</u> Sludge Storage/Disposal	<u>--</u> 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-R0025

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	County supplied
	Safety Features	S	
	Bypasses	--	
	Stormwater Overflows	--	
	Alternate Power Source	OUT	Generator; loaded every Wednesday; maint. Completed in 2007
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	S	
	Ventilation	S	
	Coarse Bar Screen	IN	1 unit; replaced in 2007
	Disposal of Screenings	S	Landfilled
	Comminutor	--	
	Grit Chamber	--	
	Disposal of Grit	--	
	Fine Screens	IN	3 units
Primary	Settling Tanks	--	
	Scum Removal	--	
	Sludge Removal	--	
	Effluent	--	
	Raw Pump Station	IN	2 units
	Ventilation	S	Forced air
Sludge Disposal	Digesters	IN	2 units
	Temperature and pH	--	
	Gas Production	--	
	Heating Equipment	--	
	Sludge Pumps	S	
	Drying Beds	--	
	Vacuum Filter	--	
	Disposal of Sludge	U	Excessive storage of solids in the system
Other	Flow Meter and Recorder	IN	Influent parshall flume; last calibrated July 2005
	Records	S	
	Lab Controls	S	
	Chemical Treatment	S	
Secondary Tertiary (list items as required)	Influent Sampler	U	One needs to be purchased & connected to flow meter
	Effluent Sampler	U	Using influent flow meter
	Oxidation Ditches	IN	2 units; dark gray in color; operated in series
	Final Clarifiers	IN	2 units; parallel operation; MLSS 5500 mg/l
	Blowers	IN	3 units; building is rotting & needs repair
Disinfection	Effluent	S	Visually clear; sludge deposits in stream bed
	Disinfection System	IN	Liquid chlorine
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	IN	
	Dechlorination	IN	Sulfur Dioxide