OhioEPA
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

May 14, 2009

Re: Washington County
Washington County Commissioners
Wastewater Treatment Plants
Compliance Evaluation Inspections
Correspondence (PWW)

Ms. Cora Marshall, Commissioner
Washington County Commissioners
Putnam Street
Marietta, Ohio 45750

Dear Ms. Marshall:

On March 30, 2009, Compliance Evaluation Inspections (CEI) were conducted at the Washington County Commissioners' owned wastewater treatment plants. The plants inspected were Riverview, Stacy Meadowcrest, Devola and Deerfield Estates. The purpose of the inspections was to determine the County's compliance with its National Pollutant Discharge Elimination System (NPDES) Permits for each of these facilities. Present for the inspections were Lila Follett and Cora Marshall representing Washington County Commissioners and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected during the inspection. A copy of my inspection report for each plant is attached. A summary of my comments for each of the inspections are below.

Riverview

1. Two of the sand filters at the facility are not usable due to the hill side eroding away. The other two sand filters need to be kept in operable condition to account for these filters being out of service.

2. At the time of the inspection, the equalization tank pump was out of service. The County needs to repair this pump as soon as possible to help prevent any more bypasses from occurring during periods of high flow. Please inform this office when the pump is put back into service.

3. The flow meter at the facility needs to be looked at for possible replacement. Accurate flow rates cannot be determined with the current flow meter and set-up.

4. The County is currently looking at options of possibly eliminating this treatment plant by connecting it to the Vincent-Barlow force main.

5. The County has reported effluent violations for this plant including Total Suspend Solids, CBOD and Nitrogen Ammonia in 2009.

Stacy Meadowcrest

1. The sand filter beds were all ponded with water. The sand filter beds need to be cleaned or the sand replaced to prevent ponding of the water and possible need to use the bypass around the filter beds or overflowing the walls.

2. The County has reported effluent violations for the following parameters in the last year:

   - Nitrogen Ammonia – March, April, June, December, 2008, January and February, 2009
   - Chlorine Residual – May, June and July, 2008
   - Dissolved Oxygen – June, July and December, 2008
   - Total Suspended Solids – December, 2008

Devola

1. The County is bypassing the sand filters due to ponding occurring on the beds. The sand in the filter beds needs to be replaced. The NPDES Permit requires that all treatment units be used in the treatment process. Please update this office when the sand in the filters will replaced and put back into operation. As required by Part III of the NPDES Permit, Ohio EPA needs to be notified when the sand filters are bypassed.

2. The pump alternator for the pumps to split the flow at the plant went out of service the day of the inspection. The County was preparing to order a replacement at the time of the inspection. Please inform this office when the pump alternator was placed by in service.

Deerfield

1. A blower was out of service at the time of the inspection. The County needs to either replace or repair the blower as soon as possible. Please inform this office when the blower has been repaired or replaced.

2. An accurate flow rate at the treatment plant cannot be determined due to a leak either around the sand filter beds or chlorine contact tank. The County needs to determine where the wastewater is leaking out and fix this problem and also be able to determine an accurate effluent flow rate. Please inform this office when the leaking around the sand filters and/or the chlorine contact tank is fixed and an accurate effluent flow rate can be determined.

Comments Applicable to All Plants

1. As inferred above, bypassing of the sand filters (or any other treatment process) is prohibited unless the criteria in Part III, Section 11 of the permits are satisfied. Unanticipated bypasses must be reported as required in Section 12 (A) of the permits.

2. As noted above, accurate effluent flow rates are needed all plants. Flow meters need to be calibrated at a minimum 1/year. Part III of the NPDES Permit requires to the County to properly maintain all equipment at the treatment plants, including flow meters.

3. The County is currently working on reducing inflow/infiltration (I/I) into its collection system. Riverview has been smoked tested, and video has been used in other parts of the collection systems. The County needs to continue working on the removal of inflow/infiltration (I/I) into the collection system. The elimination of I/I will also allow for better operation of the treatment plants to help address the effluent violations. Please update this office on the I/I removal work currently being completed.

4. The County needs to maintain an adequate amount of staffing to be able to perform regular operation and maintenance at its wastewater treatment plants. The County needs at least three people to properly perform confined space entry work.

5. The County is currently working with City of Belpre and City of Marietta to determine if current treatment plants can be taken off line and connected to those City's collection system. Ohio EPA encourages the regionalization of wastewater treatment. However, the County will still have to maintain its collection system with a licensed operator due to the Operator Certification Requirements.

6. The County needs to investigate the possibility of purchasing portable back-up generators and/or pumps to be used at its lift stations due to power outages or pump failures. This equipment will help prevent illegal bypasses or overflows from occurring.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

In conclusion, Washington County Commissioners appeared to be in marginal compliance at all of its plants due to the above noted comments.

Please respond to the above comments in writing to this office within 30 days of receipt of this letter.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,

Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosures

c: Lila Follett, Washington County

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PG00057*CD	OH0099481	March 30, 2009	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Washington County Commissioners Stacy Meadowcrest Wastewater Treatment Plant Teri Lane Belpre Township, Ohio	9:50 a.m.	February 1, 2007
	Exit Time	**Permit Expiration Date**
	10:15 a.m.	January 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Lila Follett, Operator	(740) 376-7073
Name, Address and Title of Responsible Official	**Phone Number**
Washington County Commissioners 223 Putnam Street Marietta, Ohio 45750	(740) 373-6623

C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached report

Stephen Wells, Inspector, Ohio EPA, Southeast District Office — Date: 5/15/09

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office — Date: 5/15/09