



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

May 1, 2008

Re: Washington County
White Oak Sewer Association
Compliance Evaluation Inspection
Correspondence (PWW)

Mr. Jean Yost
White Oak Sewer Association
P.O. Box 5
Barlow, Ohio 45712

Dear Mr. Yost:

On April 7, 2008, a Compliance Evaluation Inspection (CEI) was conducted at White Oak Sewer Association's wastewater treatment plant. The purpose of the inspection was to determine White Oak's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Jean Yost representing White Oak and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were taken as part of the inspection. A copy of my inspection is attached.

As a result of my inspection, I have the following comments:

1. White Oak is not submitting Monthly Operating Reports (MORs) for the plant. White Oak is required to submit MORs with the analytical results from the sampling requirements as per NPDES Permit. White Oak needs to start submitting MORs immediately for the plant or formal enforcement action will be recommended.
2. White Oak does not have a certified operator responsible for the operation of the treatment plant. White Oak's NPDES Permit requires at least a Class I Operator for the facility. A certified operator must be hired immediately. Please inform this office when a Class I Operator is hired.
3. White Oak has failed to submit a renewal NPDES Permit Application for the facility. The NPDES Permit Application needed to be submitted 180 days before the expiration date. A copy of the necessary application forms were given to Mr. Yost during the inspection. A complete application must be submitted to this office by May 30, 2008 or formal enforcement action will be recommended.

4. The sand filters at the facility need to be cleaned. There is vegetation growth in the beds. All vegetation needs to be removed from the beds. Please inform this office when this is completed.
5. With the above listed problems, White Oak needs to start discussions on connecting to the Washington County Commissioners collection system. White Oak's Permit to Install #06-2464 states on page 3, paragraph 9:

"The treatment works shall be abandoned and the sanitary sewers connected to the public sanitary sewerage system whenever such system becomes available"

Connection to the County's collection system would address Comments #1 through #4 above. I am aware that in the past there has been some discussions about this occurring. The cost of for White Oak to connect to the County's system and charge for service will be between White Oak and Washington County Commissioners.

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, White Oak Sewer Association was in non-compliance with its NPDES Permit at the time of the inspection. White Oak will need to address the above comments immediately or connect to the County's collection system to address its violations of the NPDES Permit.

Please respond to above comments in writing to this office within 20 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

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PX00007*BD	OH0099775	April 7, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
White Oak Sewer Association State Route 339 Barlow, Ohio 45712	10:30 a.m.	August 1, 2003
	Exit Time	Permit Expiration Date
	11:15 a.m.	July 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jean Yost	(740) 678-8060
Name, Address and Title of Responsible Official	Phone Number
Jean Yost White Oak Sewer Association 6207 State Route 550 Barlow, Ohio 45712	(740) 678-8060

C. AREAS EVALUATED DURING INSPECTION

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

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

*Could not evaluate due to MORs not being completed.

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

See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

5/1/08

Date



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

5/1/08

Date