



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 28, 2008

Re: Lawrence County
Union-Rome Sewer
Compliance Evaluation Inspection
Correspondence (PWW)

Lawrence County Commissioners
1 Veteran's Square
Courthouse
Ironton, Ohio 45638

Dear County Commissioners:

On April 23, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the Union-Rome Sewer District's wastewater treatment plant. The purpose of the inspection was to determine Union-Rome's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Lisa Pine and Gary Criswell representing Union-Rome and Stephen Wells representing Ohio EPA, Southeast District Office, Division of Surface Water. No wastewater samples were collected as part of the inspection. A copy of my inspection report is attached.

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

1. The new MBR wastewater treatment plant is under construction. The MBR plant will replace the existing trickling filter plant and allow for expanded flow of 2.2 MGD. Construction is expected to be completed within approximately the next 18 months. Please keep this office informed on the progress of the construction.
2. For the months of August, September, October and November, 2007 and January, 2008, the facility has had NPDES Permit effluent violations for toxicity. The new plant under construction should address these effluent violations.
3. The back-up generator at the plant was being repaired at the time of the inspection. The generator would not switch back to regular power. The plant used portable pumps to pump the influent into the plant while the power was out during this time, however the rest of the plant did not have power for approximately 24 hours. The loss of power in the plant for 24 hours caused heavy foaming to occur on the effluent of the plant. Visible foam was observed on the final effluent being discharged into the Ohio River. Please inform this office when the foam on the effluent has been eliminated.

4. Union-Rome needs to continue working on removing the inflow/infiltration (I/I) from its collection system. Please update this office on the status of the I/I removal.

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, the Lawrence County Commissioners' Union Rome Sewer District wastewater treatment appeared to be in marginal compliance with its NPDES Permit at the time of the inspection. The marginal compliance was due to the visible foam on the discharge and Union-Rome starting construction to address the NPDES Permit effluent violations.

Please respond to the above comments #1, 3 and 4 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

c: Tim Porter, Union-Rome Sewer District
c: Lisa Pine, Union-Rome Sewer District

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PK00002*ED	OH0094684	April 23, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Union-Rome Sewer District Wastewater Treatment Plant 1117 Rear 3 rd Avenue Chesapeake, Ohio 45619	9:15 a.m.	August 1, 2003
	Exit Time	Permit Expiration Date
	11:00 a.m.	July 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Tim Porter, Administrator	(740) 867-8700
Name, Address and Title of Responsible Official	Phone Number
Lawrence County Commissioners 1 Veteran's Square Courthouse Ironton, Ohio 45638	(740) 533-4300

C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

5/25/08

Date



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

5/28/08

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>				
e. Permittee is meeting compliance schedule		X*		

Comments: *Union-Rome is currently constructing new wastewater treatment plant to return to compliance with the schedule in NPDES Permit.

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>7</u> Days/Week _____	X			
e. Operator holds unexpired license of class required by permit Class: <u>IV</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:

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:

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): Oct. 1991 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>Big Run Landfill</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:

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement		Yes	No	N/A	N/E
a.	Primary flow measuring device properly operated & maintained. Type of device: <input checked="" type="checkbox"/> ultrasonic & parshall flume <input type="checkbox"/> calculated from influent <input type="checkbox"/> weir <input type="checkbox"/> Other <input type="checkbox"/> ultrasonic & weir <input type="checkbox"/> Specify: _____	X			
b.	Calibration frequency adequate (date of last calibration: <u>1/year</u>)	X			
c.	Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d.	Flow measurement equipment adequate to handle expected ranges of flows	X			
e.	Actual flow discharged is measured	X			
f.	Flow measuring equipment inspection frequency: <input checked="" type="checkbox"/> Daily <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Other				

Comments:

Part 2 - Sampling		Yes	No	N/A	N/E
a.	Sampling location(s) are as specified by permit	X			
b.	Parameters and sampling frequency agree with permit	X			
c.	Permittee uses required sampling method	X			
d.	Sample collection procedures are adequate	X			
i.	Samples refrigerated during compositing	X			
ii.	Proper preservation techniques used				
	Conform with 40 CFR 136.3				X
e.	Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f.	Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3, Laboratory - General		Yes	No	N/A	N/E
a.	EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b.	If alternate analytical procedures are used, proper approval has been obtained			X	
c.	Analyses being performed more frequently than required by permit		X		
d.	If (c) is yes, are results reported in permittee's self-monitoring report			X	
e.	Commercial laboratory used 1. Parameters analyzed by commercial lab: <u>COD, CBOD, Nitrites, Oil & Grease, Cyanide, Metals, Beloassay</u> 2. Lab name: <u>MASI</u>	X			

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance		Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained				X
g.	Satisfactory calibration and maintenance of instruments and equipment				X
h.	Adequate records maintained	X			
i. Results of latest U.S. EPA quality assurance performance sampling program:					
Date: _____		_____ Satisfactory			
		_____ Marginal			
		_____ Unsatisfactory			

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	Slight	Yes	None	Murky	

Comments:

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments: