



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

January 26, 2009

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

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

Dear County Commissioners:

On December 18, 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 Tim Porter representing Union-Rome; and Tim Campbell 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 plant is currently under construction. The tentative completion date at the time of the inspection was approximately October, 2009. The completion of the new plant is expected to address Union-Rome's compliance with the toxicity limits in the NPDES Permit. Please keep this office informed on the status of the new plant.
2. On January 7, 2009, this office was informed that the equalization (EQ) tank in Proctorville was bypassing. According to Mr. Porter, the discharge line appeared to have broken allowing for the bypass to occur. A portable pump was brought in on January 12, 2009 to help eliminate the bypass.

Union-Rome needs to look at the purchase of a portable pump to prevent this bypass from occurring in the future. The bypass is a violation of the NPDES Permit for an unpermitted discharge. Union-Rome needs to clean-up any solids accumulated on the ground in the area of the bypass and lime the area to help minimize any odors. Please send a follow-up letter outlining the approximate number of gallons spilled and the steps that will be taken to prevent this bypass from occurring in the future.

3. During the construction of the new plant, Union-Rome has had some NPDES effluent limitation violations for Total Residual Chlorine (TRC). Union-Rome needs to take the necessary steps to prevent these effluent limitation violations from occurring.
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 chlorine effluent limitations and Union-Rome starting construction to address the NPDES Permit effluent violations.

Please respond to the 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

c: Tim Porter, Union-Rome Sewer District

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPK00002*ED	OH0094684	December 18, 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	9:30 a.m.	August 1, 2003
	Exit Time	Permit Expiration Date
	11:30 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)

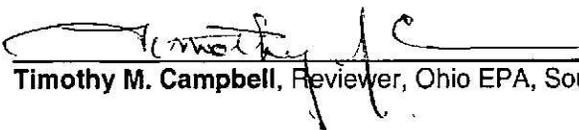
See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

1/26/09

Date



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

1/26/09

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	1		
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: 1. Equalization tank discharge may be broken causing bypass from tank.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: 0%				
b. Any collection system overflows since last inspection (CSO ____ SSO <u>X</u>)	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: Equalization basin overflowed. See inspection letter, comment #2.

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:

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: <u>2008</u> <input checked="" type="checkbox"/> Satisfactory					
<input type="checkbox"/> Marginal					
<input type="checkbox"/> Unsatisfactory					

Comments: DMR QA Lot # 141963 - TSS rated "Not Acceptable".

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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