



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-3501 FAX: (740) 385-6490
www.epa.state.oh.us

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

September 11, 2009

**Re: Meigs County
Pomeroy WWTP
Compliance Inspection
NPDES Permit No. 0PB00032*HD
Correspondence (PWW)**

Mayor and Council
Village of Pomeroy
320 East Main Street
P.O. Box 666
Pomeroy, Ohio 45769

Mayor and Council:

On July 29, 2009, I conducted an inspection of Pomeroy's wastewater treatment plant located at 500 Spring Valley Lane. This inspection was conducted in order to determine the plant's compliance status with NPDES Permit 0PB00032*HD and Ohio Revised Code Chapter 6111. Tim Campbell, Ohio EPA enforcement supervisor, accompanied me. Mr. John Anderson, treatment plant operator, represented the village during the inspection.

During the inspection, plant operation and maintenance, collection system operation and maintenance, laboratory procedures, and sludge management procedures were reviewed, among other items. Below is a list of violations noted during the inspection and subsequent record review:

Plant staffing requirements

1. Part II.A.3 of Pomeroy's current NPDES permit requires that the operator maintain records documenting the time spent performing the plant day-to-day operations. Pomeroy's operator was not recording this information. The plant is required to be staffed five days per week, for a minimum of 20 hours. Please provide at least three weeks of this required documentation within 30 days of the date of this letter.

Pomeroy must ensure that appropriate staffing records are maintained on-site as required by NPDES permit 0PB00032*HD.

Plant and Collection system operation and maintenance

2. Mr. Anderson indicated that he uses the mixed liquor suspended solids method to control the waste activated sludge process. However, he had no records documenting this as required by Ohio Administrative Code Chapter 3745-07.

As required by Part III.3.A of the NPDES permit, to operate the plant as efficiently as possible, Mr. Anderson must adopt an acceptable method of controlling the sludge wasting process and keep records to document it. There are four acceptable methods identified in *Operation of Municipal Wastewater Treatment Plants* by the Water Environment Federation.

3. Pomeroy operates a combined collection system which discharges mixed storm water and untreated sewage during certain precipitation events, called combined sewer overflows (CSOs). Pomeroy's NPDES permit requires that CSOs be monitored and occurrences and overflow volumes be reported.

When questioned about the methodology for identifying and observing CSOs, Mr. Anderson stated that he simply looks at the pipe. He also indicated that the discharge for CSOs is usually submerged, and that he often cannot see anything. Consequently, Mr. Anderson's overflow detection method is insufficient.

Pomeroy must immediately install devices in all CSO discharge structures that can be used to accurately determine if CSOs are occurring. At a minimum, the devices must provide visible and audible alarms that will remain active for the duration of the CSO event. Ideally, the device should have telemetric capabilities so that the CSO can be identified and recorded through the plant's computer system. Within 30 days of the date of this letter, please submit documentation that this equipment has been installed and is functioning properly. All equipment must be maintained and in proper working order until such a time that the Village's long term control plan has been fully implemented and CSOs no longer occur.

In order to completely assess the village's compliance status with National Combined Sewer Overflow Policy, Ohio EPA will be conducting an inspection of the collection system in the near future.

4. Currently, the Village of Pomeroy does not possess a means to provide standby power to the plant during power failure or other emergency situations. Standby power capabilities are required by Pomeroy's NPDES permit, Part III. Please provide a description of the Village of Pomeroy's plans and funding sources to provide back-up power capabilities at the waste water treatment plant.

Sludge management

5. Pomeroy's NPDES permit 0PB00032*HD requires that "the permittee...maintain the appropriate records on site to verify that the requirements of Pathogen Reduction and Vector Attraction Reduction have been met."

At the time of the inspection, records of sludge treatment, including records of the time sludge was kept in the digester was not available. There were also no records of land application site inspections.

Please provide documentation that appropriate records indicating that the requirements of pathogen reduction and vector attraction are being met. This documentation should be submitted within 30 days of the date of this letter.

In order to completely assess the village's compliance status with all applicable sludge regulations, Ohio EPA will be conducting an audit of the sludge program in the near future.

Self-monitoring equipment

6. Annual calibration of the effluent flow meter is necessary to meet the requirements of the Village of Pomeroy's NPDES permit. It was noted that the last calibration of the flow meter was January 15, 2007. The meter must be calibrated immediately, if it has not been done since the day of my inspection.

Sampling

7. NPDES permit 0PB00032*HD, Part III, 6 requires that sampling records include certain minimum items, including:
 - a. Exact place and date of sampling;
 - b. Person who performed the sampling;
 - c. Date the analyses were performed on the samples;
 - d. Person who performed the analyses;
 - e. The analytical techniques or methods used; and
 - f. The results of all analyses and measurements.

During the inspection, it was noted that sampling records do not include items a) through e). Within 30 days of the date of this letter, please provide copies of three weeks of bench sheets which include all of the above information. Pomeroy's operator must continue to record all required information and ensure that it is available for review during the next inspection.

8. Composite samplers are being used to sample both the influent and effluent at the plant. Composite samples are required to be under refrigeration (maintained at a temperature of 4 degrees Celsius) and temperature monitored and recorded. Composite sample refrigerator temperatures were not being monitored or recorded at the time of the inspection.

Please provide at least three weeks' worth of composite sampler refrigerator temperature monitoring records within 30 days of this letter. Also, please ensure that readings are taken and recorded in the future.

9. Part III, 5 of the permit requires the test procedures for the analysis of pollutants conform to regulation 40 CFR 136. Several of Mr. Anderson's testing procedures do not comply with this regulation; they are as follows:
 - a. Fecal Coliform - Mr. Anderson stated that samples for fecal coliform are pulled using the composite sampler. The sampler can contaminate the sample since it is not sterilized.

- b. 5-Day Carbonaceous Biochemical Oxygen Demand (cBOD5) – Mr. Anderson collects cBOD5 samples after the chlorination treatment process. He analyzes the samples without seeding them with a sufficient microbial population.
- c. Mercury – Mr. Anderson was not familiar with or using the rigorous sample collection procedures required by EPA Method 1631.

The village must take immediate action to ensure that all samples are collected and analyzed in accordance with regulation 40 CFR 136. The village could utilize the services of a contract laboratory for this purpose.

We are requesting that the Ohio EPA Division of Environmental Services conduct a laboratory audit to completely assess your compliance with regulation 40 CFR 136.

Laboratory procedures

- 10. Part III, 3.A. of NPDES permit 0PB00032*HD provides requirements for "facility operation and quality control", including the requirement for proper operation and maintenance of laboratory controls and quality assurance procedures. It was noted during the inspection that the laboratory's analytical balance has not been calibrated in approximately 10 years.

Please provide records of analytical balance calibration, as well as maintenance records for any other critical equipment utilized by the lab.

The village must take immediate action to return the facility to compliance with the terms and conditions of the NPDES permit.

Please respond to this letter by November 11, 2009. If you have any questions, please feel free to contact me at (740) 380-5447.

Sincerely,



Michael Yandrich
District Representative
Division of Surface Water

MY/mlm

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OH0021725	0PB00032*HD	July 29, 2009	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Pomeroy Wastewater Treatment Plant 500 Spring Valley Lane Pomeroy, Ohio 45769	12:00 PM	June 1, 2009
	Exit Time	Permit Expiration Date
	2:00 PM	May 31, 2014

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
John Anderson, Village Administrator	740-992-2166
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council, Village of Pomeroy	

C. AREAS EVALUATED DURING INSPECTION

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

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated; N/A = Not Applicable)

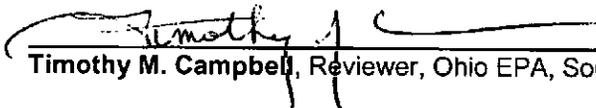
D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)



Mike Yandrich, Inspector, Ohio EPA, Southeast District Office

9-11-09

Date



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

9/11/09

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: Village experiences illegal sanitary sewer overflows from the Naylor's Run lift station.

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 Part IC</u>	X			
e. Permittee is meeting compliance schedule	X			

Comments: *No significant violations reported.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator: _____ 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: No. of shifts: <u>1</u> Days/Week: <u>5</u>		X		
e. Operator holds unexpired license of class required by permit Class: <u>III</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 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: No plant bypasses since last inspection, according to interview with John Anderson. Village must provide standby power. Adequate records of plant staffing times not maintained by operator. See letter.

--	--	--	--	--	--	--	--

Comments: Outfall submerged at time of observation.

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:

L. SAMPLING PROCEDURES (FOR CSI'S)

- Grab samples obtained
- Composite obtained
- Compositing frequency: _____ Preservation: _____
- Flow proportioned sample obtained
- Automatic sampler used
- Sample split with permittee
- Chain of custody employed
- Sample obtained from facility sampling device
- Sample refrigerated during compositing: Yes No
- Sample representative of volume and nature of discharge: _____

Comments: