Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 15, 2011

Re: Meigs County
Rutland WWTP
NPDES permit 0PA00052*FD
Reconnaissance Inspection
Correspondence (PWW)

Mayor and Council
Village of Rutland WWTP
P.O. Box 420
Rutland, Ohio 45775

Dear Mayor and Council:

On May 18, 2010, Tim Campbell and I conducted a reconnaissance inspection of the Village of Rutland's wastewater treatment plant located on Davis Road in Rutland, Ohio. Ray Dewitt and Dave Davis were present representing the wastewater treatment plant. The purpose of the inspection was to determine the Village of Rutland's compliance with the Ohio Water Pollution Control Act, Ohio Revised Code Chapter 6111, and NPDES permit 0PA00052*FD. The results of the inspection are as follows:

Operation and Maintenance:

1. The record keeping methods need to be improved in the laboratory and maintenance shop.

   a. Ohio Administrative Code (OAC) Chapter 3745-07-04 operator rules require operation time both in the plant and sewage collection system be documented. The certified operator is required to be on staff 3 days a week for 1.5 hours.

   b. Part III, Item 6 of the NPDES permit requires that each measurement or sample taken include a record of the exact place and date of sampling; the person(s) who performed the sampling or measurements; the date the analyses were performed; the person(s) who performed the analyses; the analytical techniques or methods used and the results.

   c. The District needs to purchase log books and provide staff with the correct software to keep track of the lab equipment, pump problems, pump purchases, etc. This is a small investment that will pay off with efficacy.

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2195 Front Street
Logan, OH 43138-8637

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d. The District has taken steps to come into compliance with their permit for the reporting of overflows. Continue to track and report as required in Part II, D and E of your permit.

2. The plant must be maintained at all times in good working order. The District is in violation of Part III, Item 3, of the permit.

   a. The flow splitter box is corroding and not working effectively. It needs replaced.

   b. The trash trap is not sufficient for the amount of waste coming into the plant. The effluent from the school appears to be overloading the trash trap. Either a larger trash trap or a separate trash trap located by the school prior to the pump station or at the plant is needed.

   c. The chlorination and dechlorination tank is extremely difficult to operate. Anything that prevents the operators from having to enter the tank would make it safer and easier to operate.

3. Inflow and Infiltration (I/I) appears to be a problem in the system, after reviewing the monthly operating reports. Eliminating the inflow and infiltration is often the cheapest way to make the plant operate more effectively.

Collection System:

1. The District operates approximately 250 individual grinder pump stations. There are constant problems. A combination of problems appears not to allow much time for preventative measures. The sewage system must be maintained at all times in good working order. The District is in violation of Part III, Item 3, of the permit.

   a. Investigate replacing the pumps with pumps from a different manufacturer.

   b. Items inside many of the pump stations are in various stages of disrepair. These include but are not limited to parts that are corroded including rails for the pumps, electrical boxes inside the pump station that are exposed, gasket failure, valve failure, etc.

   c. The management of the grinder pump stations needs improved because of the amount of money and time it is costing the operators. The District needs to investigate with other sewer districts with similar grinder pump stations. There is at least one sewer district in Ohio, the Buckeye Lake Wastewater Treatment Plant, that also operates a significant number of grinder pump stations. You can contact them at (740) 928-3397.

d. It may be cost effective to eliminate some of the pump stations in favor of a gravity sewer in some areas. I suggested contracting with an engineering consultant to do a preliminary study.

2. It appears the plant has inflow and infiltration problems. There are problems with inflow into the pump stations as many sit in low spots in the yards and many homes still get flooded in certain areas. It is also unknown if the any downspouts or sump pumps contribute to the problem.

   a. Waterproof lids and risers may help keep out the flow for some of the pump stations.

   b. The District must come up with a plan to protect the pumps and minimize the amount of sewage being dumped into the floodwaters when homes become flooded.

   c. The District should verify, if it has not been done already, that there are no clean water connections to the collections system. If there has been such an investigation please provide me with the most recent documentation.

3. Grease is a problem in a few commercial businesses that serve food. This can be fixed by an external grease trap. The district has the right to require those whose waste streams that are above domestic strength to require a pretreatment device that would reduce these waste streams into the sewage system. See attached information on oil/grease separators.

Sludge Handling:

1. The wastewater treatment plant's sludge holding tank was holding a thick amount of sludge. Apparently the sludge drying beds do not do operate effectively enough to facilitate drying.

2. The District's sludge management plan was submitted over five years ago. Per our new sludge rules in Ohio Administrative Code (OAC) 3745-40-03, that plan will expire one year after the effective date of the rule, July 1, 2011.

3. It appears the District may not be applying the sludge as required by OAC 3745-42-04. Please review these rules with the certified operator. Please also note these change on July 1, 2011 as well. The District must follow up with Jacob Howdyshell, at (614) 644-2018, to figure out if the proper disposal method is being followed.

4. Please note that many sewage districts have elected not to land apply because of the disposal requirements. It is usually cheaper to landfill or transfer to another wastewater treatment plant.

Flow Measurement:

1. The flow measurement equipment is broken; it needs replaced comply with the monitoring requirements in Part III, Item 3B.

Self-Monitoring Program:

1. As mentioned above, the lab was not in acceptable order. For the lab work to be considered accurate it must conform with the testing procedures in 40 CFR 136.3 per Part III, Item 5 of your NPDES permit. Below is a list of some of the issues noted with the sampling and lab procedures.

    a. Buffer solutions should not be seven years out of date. New solutions need to be purchased.

    b. It was unknown when desiccant was last changed and it was white, hence expired. Replace the desiccant at the required time per the methods in 40 CFR 136.

    c. Chlorine samples must be tested within fifteen minutes of having the sample collected. Having the contract lab do chlorine is not acceptable because it violates the hold time; hence the chlorine would have all dissipated prior to being tested at your contract lab. There are testing kits available to test chlorine which are relatively simple. It would also be admissible to have the contract lab test the chlorine on-site, if possible.

    d. The samples for ammonia need to be refrigerated while waiting for pickup by the contract lab. It also should have the proper amount of preservative added when the sample is taken. No refrigeration is available on site. I suggest either buying a refrigerator, having the contract lab take the sample, or doing the test on-site. Also you must dispose of the preservative properly.

    e. Manuals for all the equipment need to be available on site.

    f. Equipment needs to be calibrated appropriately. These calibrations must be documented.

    g. You should have a hard copy of all applicable standard operating procedures for each parameter that you sample for your permit in the lab.

I have attached copies of the inspection report. Many areas were given marginal or unsatisfactory ratings due to the issues mentioned above. Within 30 days of receipt of this letter please call to schedule a meeting to discuss the condition of the wastewater treatment plant. In this meeting we will address each of the preceding comments/recommendations. Please call me if you have any questions at (740) 380-5266.

Sincerely,

Cynthia Yandrich
District Representative
Division of Surface Water

CY/dh

Enclosure

c: Dan Gill, DEFA, CO

NPDES
Reconnaissance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PA00052*FD	OH0050130	May 11, 2010	R	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Rutland WWTP Davis Road, Rutland Meigs County, Ohio	11:00 a.m.	February 1, 2010
	Exit Time	**Permit Expiration Date**
	1:30 p.m.	January 31, 2015

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Dave Davis, Operator	740-742-2121
Name, Address and Title of Responsible Official	**Phone Number**
Mr. Lowell , Mayor P.O. Box 420 Rutland, Ohio 45775	740-742-3136

C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached letter.

Cynthia Yandrich

Cynthia Yandrich, Inspector, Ohio EPA, Southeast District Office — Date: 6-15-11

Timothy M. Campbell

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office — Date: 6-15-11