



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 19, 2011

Joe Riley, Treatment Plant Coordinator
Southeastern Correctional Institute
5900 B.I.S. Rd.
Lancaster, OH 43130

**Re: Southeastern Correctional Institute
NPDES Permit 4PP00011/ OH0101630
Compliance Evaluation Inspection
Fairfield County
Notice of Violation**

Dear Mr. Riley:

On December 12, 2011, a Compliance Evaluation Inspection was conducted at the Southeastern Correctional Institute WWTP. Present for the inspection were Ned Mathias, SEOC WWTP operator and Kelly Thiel and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

- The facility continues to be in significant non-compliance for failing to submit plans and initiate construction of WWTP upgrades as required in Part I, C – Schedule of Compliance of the NPDES permit. Submission of upgrade plans should have occurred by September 2010 and are now 15 months overdue.
- The facility is in a severe state of deterioration although the WWTP operator(s) have been able to achieve a modicum of compliance despite the dilapidated condition of the plant and little in the way of resources to operate it. The infrastructure must be upgraded to avoid the inevitable breakdown of the facility.
- The effluent flow meter has not been properly calibrated since 2009. This must be done by an outside contractor on an annual basis.
- The operator(s) must initial all logbook entries.
- Please provide me with a response (in writing) to this inspection letter by January 12, 2012.

Joe Riley, Treatment Plant Coordinator
Southeastern Correctional Institute
Page 2

Since the facility is in significant non-compliance, an approvable permit to install (PTI) must be submitted by March 16, 2012. Failure to submit the PTI may result in escalated enforcement action which could include a monetary penalty.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Vandermeer", with a long horizontal flourish extending to the right.

Paul L. Vandermeer
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

ec: Paul Vandermeer

PLV/nsm SEOC

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PP00011	OH0101630	CEI	S	II
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
12/12/2011	9:30 AM	10:30 AM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Southeastern Correctional Institute	9/1/2009
	Permit Expiration Date
	8/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Ned Mathias, WWTP operator	(740) 653-4324
Name and Title of Responsible Official	Phone Number
Joe Riley, Treatment Plant Coordinator	(740) 653-4324

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Compliance schedule items significantly overdue
U	Operations & Maintenance	Operators somehow make due with subpar resources and maintenance.
U	Facility Site Review	Crumbling infrastructure
N	Collection System	
U	Flow Measurement	No record of calibration since 2009
S	Receiving Waters	
S	Laboratory	Operator will fill out General Lab Criteria form and submit a copy to inspector in 30 days

Comments:

Signatures			
	12/14/11		12/14/11
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

Compliance Data for Southeastern Correctional Institute between 12/1/2010 to 12/1/2011

Summary

Permit Effluent Limit Violations: 13
 Permit Effluent Code Violations: 1
 Permit Effluent Frequency Violations: * 0
 Compliance Schedule Violations: 2

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	001	Copper, Total Recovera	30D Conc	24	60.	12/1/2010
December 2010	001	Copper, Total Recovera	30D Qty	0.036	.05112	12/1/2010
December 2010	001	Copper, Total Recovera	1D Conc	34	60.	12/20/2010
March 2011	001	CBOD 5 day	7D Conc	15	25.5	3/1/2011
March 2011	001	Copper, Total Recovera	30D Conc	24	25.	3/1/2011
April 2011	001	pH	1D Conc	9	9.2	4/3/2011
April 2011	001	pH	1D Conc	9	9.1	4/4/2011
April 2011	001	pH	1D Conc	9	9.3	4/5/2011
April 2011	001	pH	1D Conc	9	9.3	4/7/2011
April 2011	001	pH	1D Conc	9	9.3	4/8/2011
April 2011	001	pH	1D Conc	9	9.4	4/9/2011
June 2011	001	Copper, Total Recovera	30D Conc	24	31.	6/1/2011
August 2011	001	Copper, Total Recovera	30D Conc	24	33.	8/1/2011

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
June 2011	801	Fecal Coliform	AK	6/9/2011

Missing Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
March 2011		3099	Construction	Begin Construction
September 2011		4599	Construction	End Construction

SECTION D: PERMIT VERIFICATION

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters Y
- (c) Products and production rates conform with permit application Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process added since last inspection N
- (g) Notification given to State of new, different or increased discharges NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments: Corrected mailing address in inspection report.

SECTION E: COMPLIANCE

- (a) Any significant violations since the last inspection Y*
- (b) Permittee is taking actions to resolve violations N*
- (c) Permittee has a compliance schedule Y*
- (d) Permittee is meeting compliance schedule N*

Comments: *Permittee is in significant non-compliance with construction schedule. A PTI was to have been submitted by 9/1/2010 for WWTP improvements. This has not occurred. Construction was to have commenced by February 2011 and been completed by August 2011. To date construction has not occurred. Violations of permit limits for pH and copper are being addressed. Violations for pH were caused by a faulty meter which has been replaced with a new unit. Since this occurred, no more violations for pH have been recorded. Copper violations are being addressed by adding orthophosphate to the potable water system. This should ensure that copper will not leach from water supply lines.

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? Automatic backup diesel generator.
- (b) Adequate alarm system available for power or equipment failures Y
- (c) All treatment units in service other than backup units Y
- (d) Wastewater Treatment Works classification II
- (e) Operator of Record holds unexpired license of class required by Permit Y
Class held: II
- (f) Copy of certificate of Operator of Record displayed on-site N*
- (g) Minimum operator staffing requirements fulfilled Y
- (h) Routine and preventative maintenance scheduled and performed Y
- (i) Any major equipment breakdown since last inspection N
- (j) Operation and maintenance manual provided and maintained Y
- (k) Any plant bypasses since last inspection N
- (l) Regulatory agency notified of bypasses NA
By MOR and/or Spill Hotline (1-800-282-9378)

(m) Any hydraulic or organic overloads since last inspection N

Comments: *Operator of record shall display copy of certificate as soon as possible.

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book: *hard bound book*
- c) Log book(s) kept onsite in an area protected from weather Y
- d) Log book contains the following:
 - i) Identification of treatment works Y
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 Y
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) Y
 - iv) Laboratory results (unless documented on bench sheets) Y
 - v) Identification of person making log entries N*
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments: *Operator must initial log entries.

SECTION H: COLLECTION SYSTEM

- a) Percent combined system: *
- b) Any collection system overflows since last inspection N
CSO SSO
- c) Regulatory agency notified of overflows NA
- d) CSO O&M plan provided and implemented. NA
- e) CSOs monitored and reported in accordance with permit NA
- f) Portable pumps are used to relieve system NA
- g) Lift station alarms provided and maintained Y
- h) Lift stations equipped with permanent standby power or equivalent Y
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection. N
- j) Any complaints received since last inspection of basement flooding N
- k) Are any portions of the sewer system at or near capacity N
- l) Are operations changed during high-flow events? N

Comments: *Collection system has some very minor influences from adjacent storm drains, but not really a combined sewer system.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP)
Submitted Date: 9/9/2005 Approval #: 23-0069
- b) Sludge management plan current..... Y
- c) Sludge adequately disposed..... Y
Method: Land application on prison farm
- d) If sludge is incinerated, where is ash disposed of..... NA
- e) Is sludge disposal contracted..... NA
Name:
- f) Has amount of sludge generated changed significantly..... N
- g) Adequate sludge storage provided at plant..... Y
- h) Land application sites monitored and inspection per SMP..... Y
- i) Records kept in accordance with State and Federal law Y
- j) Any complaints received last year regarding sludge..... N
- k) Is sludge adequately processed (digestion, pathogen control) Y

Comments:

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained..... Y
Type of device: Totalizer chart Device location: Effluent discharge
- b) Calibration frequency adequate N*
Date of last calibration: 12/18/09
- c) Secondary instruments operated and maintained Y
- d) Flow measurements equipment adequate to handle full range of flows.... Y
- e) Actual flow discharged is measured..... Y
- f) Flow measuring equipment inspection frequency Daily
- g) Sampling location(s) are as specified by permit..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)..... Y**

Comments: *Flow measuring device must be calibrated within 30 days of the receipt of this letter. **Chart flow records were not available for review and presumably misfiled. Operator should ensure that these are available for inspection on request.

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) Y
- b) If alternate procedures are used, are they properly approved? Y
- c) Analysis performed more frequently NA
 If yes, are results recorded in permittee's report? NA
- d) Commercial laboratory used:
 Name: MASI laboratories
 Parameters analyzed: CBOD₅, TSS, NH₃, metals, bacteria
- e) Quality assurance manual provided and maintained Y
- f) Calibration and maintenance of instruments is satisfactory? Y
- g) Results of last U.S. EPA quality assurance NA
 Date:

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	No	No	No	No	No	Clear	

Comments:

SECTION M. MULTIMEDIA OBSERVATIONS

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories NA
- b) Do you notice staining or discoloration of soils, pavement or floors NA
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation NA
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks NA
- e) Do you notice any unusual odors or strong chemical smells NA
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities NA

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

- 1) What is the cause of the condition?
- 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: