



**Environmental  
Protection Agency**

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

Re: **Notice of Violation**  
Hardin County  
Kenton WWTP  
NPDES Permit

March 14, 2012

Mr. Mike Heilman  
Kenton WWTP Superintendent  
230 Gilmore Road  
Kenton, Ohio 43326

Dear Mr. Heilman:

On March 6, 2012 a compliance inspection was conducted at the City of Kenton Wastewater Treatment Plant. You were present and provided information on operation and maintenance of the plant. The inspection included a tour of the plant and review of the storm water basin overflow. During our visit, all major treatment units were in service. The final effluent discharging to the Scioto River was clear with no noticeable odor.

A review of the discharge monitoring reports (DMRs) from November 2011 to February 2012 shows there have been numerous permit limit violations. The specific instances of non-compliance are enclosed on a separate sheet. Further review of your self-monitoring reports for the previous six months, ending in January 2012, indicates that you are in significant non-compliance (SNC) with the effluent limitations contained in your NPDES permit. The specific instances of SNC are enclosed on a separate sheet. It is noted that the violations are loading violations that have resulted from excessive flows to the plant during precipitation events. The city should undertake efforts to reduce the amount of storm water that enters the collection system. These efforts should include but are not limited to sewer separation, and downspout and footer drain removal inspection/enforcement.

Our completed inspection report is enclosed. If you have any questions, please contact me at (419) 373-3053.

Sincerely,

Ryan Gierhart  
Division of Surface Water

/jlm

Enclosures

pc: Mayor and Council

ec: Inspection Tracking

Get New Data								
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PD00020*KD	November 2011	001	00530	Total Suspended Solids	30D Qty	109	186.758	11/1/2011
2PD00020*KD	November 2011	001	00530	Total Suspended Solids	7D Qty	164	340.047	11/15/2011
2PD00020*KD	December 2011	001	00530	Total Suspended Solids	7D Qty	164	310.434	12/1/2011
2PD00020*KD	December 2011	001	00530	Total Suspended Solids	30D Qty	109	137.209	12/1/2011
2PD00020*LD	January 2012	001	00530	Total Suspended Solids	7D Qty	164	250.408	1/22/2012

Get New  
Data

Get Detail  
for Selected  
Permit

### Facilities in Significant Non-Compliance \*\*

Period: Aug-11 Jan-12

County	Permit #	Facility Name	Major	Station Code	Param Code	Parameter Name	Max % Exceed	# Months Signif Exceed (1)**	# Months Exceed (2)**
Hardin	2PD00020	Kenton WWTP	M	1	00530	Total Suspended Solids	211.6	6	6



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PD00020	OH0025925	3/06/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Kenton Wastewater Treatment Plant 230 Gilmore Road Kenton, Ohio 43326	1:00 pm	March 1, 2009
	Exit Time	Permit Expiration Date
	4:15 pm	July 31, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Mike Heilman, WWTP Superintendent	419-674-4303	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council City of Kenton 111 West Franklin Street, P. O. Box 220 Kenton, Ohio 43326	419-674-4850	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Final effluent discharge to the Scioto River was clear with no noticeable odor.</p> <p>CBOD test was reviewed in lab. It was recommended that the calculations and seeding procedure be included in the SOP. Facility was doing a good job tracking calibration of equipment and keeping records.</p> <p>Facility is starting to work on the compliance schedule for the bypassing no feasible alternatives analysis and is looking to reduce/eliminate inflow/infiltration in system.</p>	
Inspector	Reviewer
 Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
3-6-12 Date	3/9/12 Date

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described  
in permit..... Y
- (f) Storm water discharges properly permitted..... N/E

**Section F: Compliance**

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES permit
- (f) Permittee is in compliance with schedule..... N/E
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

**Comments/Status:**

Loading violations for TSS were noted in November, December, and January.

Violations appear to be resulting from bypassing of eq basin. Facility looking at reducing I&I and completing compliance schedule.

The first mile stone in the compliance schedule (comprehensive analysis report) is due January 1, 2013.

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed ..... Y
  - i. What does the back-up power source operate.....

Entire plant

ii. How often is the generator tested under load.....

Once a month

(b) Which components have an alarm system available for power or equipment failures.....

All major treatment components have alarms.

- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... Y  
 Computer Program
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... Y
- (h) Any plant upsets since last inspection..... N

Section G: Operation & Maintenance con't

**Record Keeping/Operator of Record:**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... Y
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hardbound book

- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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 operator and maintenance activities

- (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
- iv. Laboratory results (unless documented on bench sheets)... Y
- v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

**Comments/Status:**

Log book: Timesheets are used to keep track of arrival and departure time at plant. Lab results kept on bench sheets.

**Section G: Operation & Maintenance con't**

**Collection System:**

- (a) Are there pump stations in the collection system..... Y
  - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....8
  - ii. How many pump stations have telemetered alarms.....0
  - iii. How many pump stations have operable alarms.....8
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N/A
- (d) CSOs in the collection system....if so, what is the LCTP status..... N
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... N
- (g) RDII Program established and active..... N/E
- (h) Any WIB complaint received since last inspection..... N/E
- (i) Is there a WIB response plan..... N/E
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

**Comments/Status:**

It is known that several storm water catch basins are still tied into the sanitary system. Looking at evaluation removal of these storm water connections from the sanitary system.

Section H: Sludge Management

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (a) Method of Sludge Disposal...  Land Application  
 Haul to Another NPDES Permittee  
 Haul to a Mixed Solid Waste Landfill

\*if one of the selected methods is land application, complete applicable charts.

- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/E
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/E

**Comments/Status:**

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**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):  

Parshall flume with ultrasonic level
- (b) Flow meter calibrated annually ..... Y  
(Date of last calibration: 7/22/2011)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

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**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y  
(see GLC page)
- (d) 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

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**Section I: Self-Monitoring Program (con't)**

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable:
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance

- Preservation
- Interferences
  - Apparatus and Materials
  - Reagents
  - Corrective Action
  - Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. N/A
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y  
(see score from GLC page)
- (h) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: phosphorus, oil & grease, nitrate/nitrite, strontium, mercury, copper, zinc, lead, cadmium, nickel, chromium, hex. Chromium, TDS, sludge metals, sludge TKN, sludge phosphorus, sludge fecal coliform  
Lab name:, Alloway

*Discharge Monitoring Report Quality Assurance (DMRQA)*

- (a) Participation in latest USEPA quality assurance performance sampling..... N/E  
Date:
- (b) Were any parameters "Unsatisfactory"..... N/E
- (c) Reasons for "Unsatisfactory" parameters.....

**Comments/Status:**

CBOD test was reviewed in lab. It was recommended that the calculations and seeding procedure be included in the SOP. Facility was doing a good job tracking calibration of equipment and keeping records.

**Section J: Effluent/Receiving Water Observations**

Outfall # 2PD00016001

Outfall Description: Outfall observed was clear, colorless with no noticeable odor

Receiving Stream: Scioto River

Receiving Stream Description: Stream appeared clear with steady flow.

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**Section K: Multimedia Observations**

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

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

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	Break Tank
	Safety Features	S	Fence Surrounding Plant
	Bypasses	--	
	Storm Water Overflows	OUT	Equalization Tank
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	--	
	Pump Station	IN	4 pumps 2 (6mg) Variable Speed Pumps, 2 (12mg) standard pumps
	Ventilation	S	
	Bar Screen	OUT	On comminutor bypass
	Disposal of Screenings	S	Land filled
	Comminutor	IN	Muffin Monster / Auger with fine screening
	Grit Chamber	IN	2 Aerated Tanks/gray effluent
	Disposal of Grit	S	Land filled
	Screen Basket	IN	Cleaned Weekly
Sludge Disposal	Digesters	IN	2 Units - Aerobic
	Temperature and pH	--	
	Gas Production	--	
	Heating Equipment	--	
	Sludge Pumps	IN	2 Screw Pumps( sludge wasting form final clarifiers), 2 Positive Displacement Pumps (send sludge to belt press from digesters)
	Belt Filter Press	IN	Operated couple days a week, polymer added
	Disposal of Sludge	S	Land Applied
Sludge Thickener	IN	1 Unit	
Other	Flow Meter and Recorder	IN	Pulsar Ultrasonic, parshall flume
	Records	S	
	Lab Controls	S	
	Chemical Treatment	--	
Secondary - Tertiary	Oxidation Ditch	IN	Medium brown color, 3 rings outside/in operation
	Final Clarifier	IN	2 Units
	Post Aeration	IN	
Disinfection	Effluent	S	Clear
	Disinfection System(UV)	OUT	Ultraviolet - Summer only