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

April 20, 2012

Re: Meigs County
Pomeroy WWTP
Compliance Evaluation Inspection
NPDES Permit 0PB00032
OH0021725
Correspondence (PWW)

Mr. Paul Hellman, City Administration
Village of Pomeroy
P.O. Box 666
Pomeroy, Ohio 45769

Dear Mr. Hellman:

On March 27, 2012, I performed a compliance evaluation inspection of the sewage treatment lagoons serving the Village of Pomeroy. You accompanied me and represented the Village of Pomeroy during the inspection. The purpose of the inspection was to determine if the wastewater treatment plant was meeting the terms and conditions set forth in its NPDES permit.

As a result of the inspection and review of our files, I have the following comments:

1. Part II, Item (A) of the permit states, "The permittee shall maintain the records required by of 3745-7-09 OAC including records of daily visits to the treatment facility at least 5 days per week by the permittee…these records shall be accessible onsite for twenty-four hour inspection, records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years"

   At the time of the inspection, no log book was found to be accessible. You must begin tracking time at the plant for the certified operator. The Village responded that they would provide this in 2009, this needs to be taken care of immediately.

2. Part II, Item (F) of the permit states "The entire wastewater treatment system including the collection system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. The permittee is required to implement the minimum control measures identified by U.S.E.P.A. for CSOs that are applicable to its system..."

   The permit requires proper operation and maintenance of the collection system and an operational plan. The operational plan must include a description of CSO maintenance; a log book documenting work; and

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properly trained staff. This section also requires a pollution prevention program that includes street sweeping, litter control awareness, and an oil recycling program. At the time of the inspection, no operation and maintenance manual or pollution prevention plan has been implemented. The village does not own a street sweeper and also does not have a jetter truck to clean out the sewer. The village should make sure it has the proper equipment and trained personal to carry out the nine minimum controls until the CSOs are eliminated. Please respond in writing to what will be completed and when.

3. Part III, Item 3(A) of the permit states: "All wastewater treatment works shall be operated in a manner consistent with the following: A) At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit."

   There are numerous operation and maintenance problems that need to be addressed by the village. Below is a summary of the items of concern:

   - **As you are aware, the Nylers Run Pump Station is in disrepair. The sewer district is currently renting equipment to pump sewage to the plant. I understand when construction begins the pump station will be one of the first priorities. This pump station has been having problems for years and needs to be repaired immediately.**

   - **Almost all of the violations in the last two years are due to chlorine pump failure. Even though there has not been a wastewater effluent violation since June 2011, I recommend you evaluate replacing the disinfection system.**

   - **An inspection of the pump stations reveals there are corrosion issues. I understand the 4th Street and Naylor's Run pump stations will be replaced with the upcoming construction.**

     - **The pump station located by the McDonald's at West Main Street appears to be having the most corrosion issues. In addition, there appears to be a grease issue in the pump station. I recommend the village prepare and implement a grease ordinance to ensure restaurant owners implement best management practices. I have enclosed an example ordinance. Please contact Fred Snell our pretreatment coordinator at (740) 380-5423 if you would like to pursue this matter.**

- **I recommend the village begin evaluating the other pump stations that are experiencing corrosion issues to determine what preventative measures the village can implement to address the problems. Without preventative measures being taken, the remaining pump stations will have to be replaced sooner than previously planned.**

- **As you are aware, the influent screen is no longer operational; at least one of the valves in the aeration tanks has failed while the remaining valves in the aeration basin are corroded badly; there is sludge in the weirs; and scum in the chlorine contact tank. At the time of the inspection, the final effluent was clear and in compliance with permit limits. Please be aware that the plant is in need of repair. I recommend you schedule a meeting with your contractors to finalize the construction schedule in order to return the facility to compliance with the permit.**

- **The village needs to develop an Operation and Maintenance (O&M) manual for the wastewater treatment plant. The manual should include standard operating procedures in the lab and better record keeping with log books. Please be sure adequate staffing is allocated for the nine minimum controls and combined sewer overflow maintenance.**

Please respond to my comments in writing within fifteen days of receipt of this letter. Should you have any questions, please feel free to contact me at (740) 380-5266.

Sincerely,

Cynthia Yandrich
District Representative
Division of Surface Water

CY/dh

Enclosure

c: Dan Gill, CO, DEFA

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PB00032*HD	OH0021725	March 27, 2012	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Pomeroy WWTP 500 Spring Valley Lane Pomeroy, Ohio, Meigs County	12:30 p.m	June 1, 2009
	Exit Time	**Permit Expiration Date**
	5:00 p.m.	May 31, 2014

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Paul Hellman, Administrator	(740) 992-2166
Name, Address, & Title of Responsible Official	**Phone Number**
Paul Hellman, Administrator 320 E Main Street P.O. Box 660 Pomeroy, ohio 45769	(740) 992-2166

C. AREAS EVALUATED DURING INSPECTION

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

See attached letter.

Cynthia Yandrich — 4-20-12

Cynthia Yandrich, Inspector, Ohio EPA, Southeast District Office — Date

Jennifer M. Witte — 4/20/12

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	☒	☐	☐	☐
b. Correct name & location of receiving waters	☒	☐	☐	☐
c. Product(s) & production rates conform with permit application (industries)	☐	☐	☒	☐
d. Flows & loadings conform with NPDES permit	☒	☐	☐	☐
e. Treatment processes are as described in permit application/briefing memo	☒	☐	☐	☐
f. New treatment process(es) added since last inspection	☐	☒	☐	☐
g. Notification given to state of new, different, or increased discharges	☐	☐	☒	☐
h. All discharges are permitted	☒	☐	☐	☐
i. Number & location of discharge points are as described in permit	☒	☐	☐	☐

Comments: CSO community.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	YES	NO	N/A	N/E
a. Any significant violations since the last inspection	☒	☐	☐	☐
b. Permittee is taking actions to resolve violations	☒	☐	☐	☐
c. Permittee has compliance schedule	☒	☐	☐	☐
d. Compliance schedule contained in: 0PB00032	☒	☐	☐	☐
e. Permittee is meeting compliance schedule	☒	☐	☐	☐

Comments: Violations have been chlorine and fecal violations, mostly chlorine.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: ☐ Dual Feed: ☐	☐	☒	☐	☐
b. Adequate alarm system available for power or equipment failures	☐	☐	☒	☐
c. All treatment units in service other than backup units	☒	☐	☐	☐
d. Sufficient operating staff provided: # of shifts: 1 Days/Week: 5	☒	☐	☐	☐
e. Operator holds unexpired license of class required by permit. Class: III	☒	☐	☐	☐
f. Copy of certificate of Operator of Record displayed on-site	☐	☒	☐	☐
g. Minimum operator staffing requirements fulfilled (OAC 3745-7)	☐	☐	☒	☐
h. Routine & preventive maintenance schedule/performed on time	☒	☐	☐	☐
i. Any major equipment breakdown since last inspection	☒	☐	☐	☐
j. Operation & maintenance manual provided & maintained	☐	☒	☐	☐
k. Any plant bypasses since last inspection	☐	☒	☐	☐
l. Regulatory agency notified of bypasses: On MORS: ☐ 800 No.: ☐	☐	☐	☒	☐
m. Any hydraulic and/or organic overloads experienced since last inspection	☐	☒	☐	☐

Comments: Pomeroy needs to improve its log books and need to develop a operation and maintenance manual. Parts of the wastewater treatment plant and sewer system are falling apart and need replaced.

Record Keeping	YES	NO	N/A	N/E
a. Log book provided	☐	☒	☐	☐
b. Log book kept on-site	☐	☒	☐	☐
c. Log book contains the following:	☐	☐	☐	☐
1. Identification of treatment works	☐	☒	☐	☐
2. Date/Time of arrival/departure of ORC	☐	☒	☐	☐
3. Daily record of operation and maintenance activities	☐	☒	☐	☐
4. Laboratory results (unless documented on bench sheets)	☐	☒	☐	☐
5. Identification of person making log entries	☐	☒	☐	☐
d. Is the ORC submitting written notification to Ohio EPA and permittee when a collection system overflow, treatment plant bypass or effluent limit violation has occurred.	☒	☐	☐	☐

Comments: A log book needs to be kept on site. Good at reporting collection system overflow and effluent violations.

Collection System	YES	NO	N/A	N/E
a. Percent combined system. Percent: 35-50%	☒	☐	☐	☐
b. Any collection system overflows since last inspection: CSO: ☒ SSO: ☒	☒	☐	☐	☐
c. Regulatory agency notified of overflow (SSOs)	☒	☐	☐	☐
d. CSO O&M plan provided and implemented	☐	☒	☐	☐
e. CSOs monitored and reported in accordance with permit	☒	☐	☐	☐
f. Portable pumps used to relieve system	☒	☐	☐	☐
g. Lift station alarm systems provided and maintained	☒	☐	☐	☐
h. Are lift stations equipped with permanent standby power or equivalent	☐	☒	☐	☐
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	☐	☐	☒	☐
j. Any complaints received since last inspection of basement flooding	☐	☒	☐	☐
k. Are any portions of the sewer system at or near capacity	☐	☐	☐	☒

Comments: Still do not have the equipment to implement nine minimum controls. Pump stations need to be fixed to have standby power. Some of the lift stations will be replaced with telemetry and to accomidate portable genreator.

H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: landfill	☒	☐	☐	☐
b. If sludge is incinerated, where is ash disposed of? _____	☐	☐	☒	☐
c. Is sludge disposal contracted? Name: Waste Management	☒	☐	☐	☐
d. Has amount of sludge generated changed significantly since last inspection	☐	☒	☐	☐
e. Adequate sludge storage provided at facility	☐	☒	☐	☐
f. Land application sites monitored and inspected per state rules	☐	☐	☒	☐
g. Records kept in accordance with state rules	☐	☐	☒	☐
h. Any complaints received in last year regarding sludge	☐	☐	☒	☐
i. Is sludge adequately processed (digestion, dewatering, pathogen control) in accordance with Ohio EPA rules	☐	☐	☒	☐

Comments: Holding a lot of sludge in sludge holding. Will be getting a sludge press during this years construction.

I. SELF-MONITORING PROGRAM

Part 1 – Flow Measurement	YES	NO	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: ☐ Ultrasonic & parshall flume ☐ Calculated from influent ☐ Weir ☐ Other ☒ Ultrasonic & weir specify: _____	☒	☐	☐	☐
b. Calibration frequency adequate. Date of last calibration: 11/23/11	☒	☐	☐	☐
c. Secondary instruments (totalizers, recorders, etc.) properly operated and maintained	☒	☐	☐	☐
d. Flow measurement equipment adequate to handle expected ranges of flows	☒	☐	☐	☐
e. Actual flow discharged is measured	☒	☐	☐	☐
f. Flow measuring equipment inspection frequency: ☒ Daily ☐ Monthly ☐ Weekly ☐ Other				

Comments:

Part 2 - Sampling	YES	NO	N/A	N/E
a. Sampling location(s) are as specified by permit	☒	☐	☐	☐
b. Parameters and sampling frequency agree with permit	☒	☐	☐	☐
c. Permittee uses required sampling method	☒	☐	☐	☐
d. Sample collection procedures are adequate	☒	☐	☐	☐
i. Samples refrigerated during compositing	☒	☐	☐	☐
ii. Proper preservation techniques used	☒	☐	☐	☐
Conform with 40 CFR 136.3	☒	☐	☐	☐
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, & maintenance records)	☐	☒	☐	☐
f. Adequate records maintained of sampling date, time, exact location, etc.	☐	☒	☐	☐

Comments: Need to work on documenting work, it is apparent they are calibrating but nothing is noted in bench sheets. Need to keep better benchsheets with pen, with operator's intials, include calibrations, etc.

Part 3 – Laboratory, General	YES	NO	N/A	N/E
a. Written Standard Operating Procedures (SOPs) for all analysis performed on-site	☐	☒	☐	☐
b. EPA approved analytical testing procedures used (40 CFR 136.3)	☐	☐	☒	☐
c. If alternate analytical procedures are used, proper approval has been obtained	☐	☐	☒	☐
d. Analysis being performed more frequently than required by permit	☐	☒	☐	☐
e. If (c) is yes, are results reported in permittee's self-monitoring report	☐	☐	☒	☐
f. Commercial laboratory used: 1. Parameters analyzed by commercial lab: CBOD, Oil and Grease, Nitrogen Ammonia, Nitrite plus Nitrate, Phosphorus, Nickel, Zinc, Cadmium, Lead, Chromium, Copper, Fecal Coliform, Mercury Low Level 2. Lab name: MASI				

Comments: Lab Manuals were not available for all the equipment. As part of updating the O & M manual you should outline procedures for the minor lab work that is done. Good chain of command information.

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E
a. Quality assurance manual provided and maintained	☐	☒	☐	☐
b. Satisfactory calibration and maintenance of instruments and equipment	☐	☐	☐	☒
c. Adequate records maintained	☐	☒	☐	☐
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: N/A ☐ Satisfactory ☐ Marginal ☐ Unsatisfactory				

Comments: Keep track of the calibration of the equipment used. Document the work better.

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	--	--	--	--	--	--	

Comments: Ohio River is outfall, hard to see from bank.

K. MULTIMEDIA OBSERVATIONS

Collection System	YES	NO	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories	☐	☒	☐	☐
b. Do you notice staining or discoloration of soils, pavement, or floors	☐	☒	☐	☐
c. Do you notice distressed (unhealthy, discolored, dead) vegetation	☐	☒	☐	☐
d. Do you see unidentified dark smoke or dustclouds coming from sources	☐	☒	☐	☐
e. Do you notice any unusual odors or strong chemical smells	☐	☒	☐	☐
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities	☐	☒	☐	☐

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:

923.28 FAT, OIL AND GREASE CONTROL.

(a) The purpose of the City of Zanesville, Ohio's Fat, Oil and Grease program is to education and monitor Food Service Establishments on proper fat, oil and grease management. This includes best management practices and other approved strategies to aid in the prevention of fats, oils and greases accumulating in the municipal wastewater system that may cause sanitary sewer blockages and obstructions.

(b) Definitions.

(1) "Fats, Oils and Greases" or "FOG" means organic polar compounds derived from animal and/or plant sources that contain multiple carbon chain triglyceride molecules. These substances are detectable and measurable using analytical test procedures established in 40CFR 126, as may be amended from time to time. All are sometimes referred to herein as "grease" or "greases" or "FOG".

(2) "Food Service Establishments" or "FSE" means an establishment which has as one of its primary purposes the activity of preparing, manufacturing, processing and serving or otherwise making available for consumption, foodstuffs, such as restaurants, caterers, commercial kitchens at facilities such as schools, hospitals, nursing homes, prisons, correction facility, or other similar institutes, or any other facility that discharges FOG at a level above the effluent limits set forth in Section 923.11(c) of the Codified Ordinances of the City of Zanesville. An FSE does not include a personal residence or a home based daycare which serves meals to less than 5 unrelated individuals each day.

(3) "Grease interceptor" means a device for separating waterborne greases and grease complexes from wastewater and retaining such greases and grease complexes prior to the wastewater exiting the interceptor and entering the sanitary sewer collection and treatment system. Grease interceptors also serve to collect solids that settle, generated by and from activities that subject FSE's to this section, prior to the water exiting the interceptor and entering the sanitary sewer collection and treatment system. Grease traps and interceptors are sometimes referred to herein as "grease interceptors".

(c) Grease Interceptor Installation for New Establishments. All Food Service Establishments that begin doing business after the effective date of this section shall install an appropriate grease interceptor as determined by a qualified professional engineer and as approved by the Zanesville Muskingum County Health Department Plumbing Inspector and the Zanesville Public Service Director during the plan review process prior to installation.

(d) Existing Establishments. All Food Service Establishments in business prior to the effective date of this section, which have grease interceptors already installed, whether inside or outside of the establishment, must meet the provisions set forth in Section 923.11(c) of the Codified Ordinances of the City of Zanesville, and if it is determined that they are failing to do so or if they renovate the plumbing in their establishment they must then install an appropriate grease interceptor as determined by a qualified professional engineer and as approved by the Zanesville Muskingum County Health Department Plumbing Inspector and the Zanesville Public Service Director during the plan review process prior to installation.

(e) Grease Interceptor Inspections and Maintenance Monitoring. Grease interceptor monitoring shall be completed during Food Service Establishment Inspections performed by the Zanesville Muskingum County Health Department Plumbing Inspector and Zanesville Public Service Director. Section 923.08 of the City of Zanesville's Sewer Use Regulations provides for special interceptors and their maintenance. The use of enzymes and other biological agents is prohibited unless approved by the City of Zanesville's Director of Public Service.

(f) Maintenance. Food Service Establishments shall perform adequate maintenance on grease interceptors to maintain optimal performance as determined by the Zanesville Muskingum County Health Department Plumbing Inspector and Zanesville Public Service Director. FSE's shall keep up-to-date maintenance records including hauling manifests, inspection logs and repair logs. These records shall be retained for a minimum of 3 years and shall be made available to Zanesville Muskingum County Health Department sanitarians and Zanesville Public Service Director upon request.

(g) Enforcement. Enforcement shall be per the City of Zanesville's Sewer Use Regulations 923.99 Penalty. The City of Zanesville may take enforcement action against any Food Service Establishment for failure to comply with Sewer Use Regulations 923.08, 923.11 or 923.28.

(h) Exemptions. The Zanesville Public Service Director shall have the authority to grant exemptions to the requirements set forth in this section if the Director believes that a strict compliance would place an undue burden upon the FSE and the Director believes that the integrity of the City's sewer system will not be adversely affected by the exemption.

(Ord. 09-72. Passed 8-10-09.)