



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

October 29, 2012

Michael B. Nixon, Superintendent
Upper Hocking WPCF
104 East Main Street
Lancaster, OH 43130

**Re: Upper Hocking WPCF
NPDES Permit 4PD00102/ OH0136603
Compliance Evaluation Inspection
Fairfield County**

Dear Mr. Nixon:

On October 23, 2012, a Compliance Evaluation Inspection was conducted at the Upper Hocking WPCF. Present for the inspection were Mike Nixon, Paul Mentz, and Lowell Clugston representing the City of Lancaster 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. Please see the contents of the enclosed report for details concerning the inspection.

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

Paul L. Vandermeer
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Paul L. Vandermeer

PLV/nsm Lancaster Upper Hocking

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4FD00102	OH0136603	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
10/23/2012	9:00 am	11:45 am	No	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Upper Hocking WPCF 1442 Campground Road Lancaster, OH	11/1/2012
	Permit Expiration Date
	10/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Paul Menz, Plant Manager Lowell Clugston, Operator	(740) 687-6664
Name and Title of Responsible Official	Phone Number
Michael B. Nixon, Superintendent	(740) 687-6664

SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S*	NPDES Compliance	AB code
S	Operations & Maintenance	
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
S	Receiving Waters	
S	Laboratory	D.O. and pH meters calibrated regularly as needed.

Comments: *AB codes were due to samples lost by the contract laboratory. There was not time to resample prior to the next sampling period. The City now analyzes ammonia samples for Upper Hocking WWTP at the Lawrence Street WWTP to avoid a recurrence of the situation.

Signatures

	10/24/12		10/24/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

Compliance Data for Upper Hocking WPCF between 11/1/2011 to 10/1/2012

Summary

Permit Effluent Limit Violations: 0
 Permit Effluent Code Violations: 8
 Permit Effluent Frequency Violations: 0
 Compliance Schedule Violations: 0

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/24/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/24/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/24/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/24/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/25/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/25/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/25/2012
January 2012	001	Nitrogen, Ammonia (NH3)	AB	1/25/2012

Flow Data for Upper Hocking WPCF between 11/1/2011 and 10/1/2012

	Date	Flows (MGD)
Ten Highest Flows	12/6/2011	5.121
	11/29/2011	5.116
	11/28/2011	4.786
	11/30/2011	4.164
	12/7/2011	4.056
	12/23/2011	4.037
	1/27/2012	3.599
	11/23/2011	3.531
	12/5/2011	3.489
	1/23/2012	3.356
Average Flow Rate		1.481

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 Y
- (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: **Ultraviolet disinfection is available for use, however the membrane-based treatment system adequately removes bacteria and so the UV system is not activated unless testing results show elevated concentrations of bacteria in the effluent.*

SECTION E: COMPLIANCE

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

Comments: **A-code violations were not serious or in the realm of control by the City. The City has taken measures to ensure that samples are not lost by analyzing ammonia samples at their own lab located at the Lawrence Street WWTP.*

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? *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 III
- (e) Operators of Record holds unexpired license of class required by Permit Y
Class held: III or IV
- (f) Copy of certificate of Operators of Record displayed on-site Y
- (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: **Equalization basin available for service, but not in use at the time of the inspection. ^Routine and preventative maintenance are managed by a computerized system of work orders with follow-up by management.*

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book E*
- 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 Y*
- 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? ... NA

Comments: **Log book consists of a time card and clock along with a separate sheet documenting calibration of sensors and record of operation. Repairs and maintenance are tracked with work orders as noted in Section F above.*

SECTION H: COLLECTION SYSTEM

- a) Percent combined system: 0%
- 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 N
- 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? Y^

Comments: *#4 pump stations were inspected; Lancaster Industrial Park, Upper Hocking, YMCA, and Wheeling Street. All pump stations looked to be well maintained and functioning properly. All pump stations are inspected on a daily basis (each has a log sheet) and repairs/maintenance performed as needed. *Collection system*

improvement and repair work ongoing. ^The equalization basin is brought into operation during significant precipitation events.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge adequately disposed..... Y
 Method: *Landfill (Tunnel Hill Landfill, Perry County)*
- b) If sludge is incinerated, where is ash disposed of..... NA
- c) Is sludge disposal contracted..... Y
 Name: *Big "O" Refuse*
- d) Has amount of sludge generated changed significantly..... N
- e) Adequate sludge storage provided at plant..... Y
- f) Records kept in accordance with State and Federal law Y
- g) Any complaints received last year regarding sludge..... N
- h) Is sludge adequately processed (digestion, pathogen control) Y*

Comments: **A cannibal system is in operation for sludge management and significantly reduces the volume of sludge destined for disposal. Sludge disposal generally occurs only 1 to 3 times per year.*

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained..... Y
 Type of device: *Magmeter* Device location: *Filtrate pump*
- b) Calibration frequency adequate NE*
 Date of last calibration: *NE**
- c) Secondary instruments operated and maintained..... NA
- 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: **The City shall provide the factory specifications outlining the need (or not) for calibration of the unit by November 30, 2012.*

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? NA
- c) Analysis performed more frequency N
 If yes, are results recorded in permittee's report? Y
- d) Commercial laboratory used: Y

Name: *Test America (metals); Enviroscience (bioassay)*

- e) Quality assurance manual provided and maintained NA
- f) Calibration and maintenance of instruments is satisfactory? Y

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	None	None	None	None	None	Clear	

Comments:

SECTION M: 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?

Comments: