



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

December 17, 2012

Re: Tuscarawas County
Baltic WWTP
Compliance Inspection
OPB00067, OH0047783
Correspondence (PWW)

Mayor and Council
Village of Baltic
P.O. Box 320
Baltic, Ohio 43804-0320

Dear Mayor and Council:

On December 5, 2012, I conducted a Compliance Evaluation Inspection (CEI) of the Village of Baltic wastewater treatment plant. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES Permit Number OPB00067*HD. Plant Superintendent Tim Griffith, Village Employee Richard Honaker and myself were present during the inspection.

As a result of the inspection, I have the following comments:

1. A review of the facility's discharge monitoring reports (DMRs) from January 2011 to October 2012 showed two violations, both of which were violations of total phosphorus (see attached data).
2. During the review of the DMR data, I noted two exceptionally high flow values. One was at the final outfall on January 20, 2010 with a reported flow of 87 MGD. The other was at the influent station on March 28, 2012 with a reported flow of 92 MGD. Mr. Griffith indicated during the inspection that these were likely entered in error. Please review your records and if they were entered incorrectly, please submit revised eDMR reports with the corrected information.
3. Two of the three oxidation ditches were in operation during my inspection. The third was down for cleaning and to rebuild the gear box. The weirs in the clarifiers of the two operating ditches had sludge and trash accumulated in them. The weirs should be cleaned on a regular basis. Heavy vegetation was noted growing out of one aerator. The vegetation needs to be removed.
4. Testing is performed by Coshocton Environmental for all parameters except for pH, dissolved oxygen and temperature. Two of the three pH buffer solutions used by the facility to calibrate the pH meter were expired. These need to be replaced

immediately with unexpired buffer solutions. I would recommend purchasing the buffer solutions in smaller quantities (100ml to 500ml) so that less is wasted when it expires.

5. Baltic is currently hauling dried sludge to the Kimble Sanitary Landfill on a routine basis. Your NPDES permit only includes a provision for disposal of sludge at a landfill in emergency situations only and therefore does not contain a table in Part I for the reporting of sludge taken to a landfill. For all future disposals, report the sludge weight disposed at the landfill under Table 581 under Sludge Fee Weight (parameter code 51129) and Sludge Weight (parameter code 70316). For all other parameters under the 581 table, use the AH code and note that the sludge was disposed at a landfill. When your permit is renewed we will include station 588 for the reporting of sludge disposed at a landfill.
6. A portion of the collection system was inspected during the summer of 2012 by camera. Seven homes were identified as having clean water connections (footer drains, downspouts, sump pumps, etc.). Please provide a schedule of when these connections will be eliminated. Also, please provide a map of the sewage collection system to this office.
7. A new SCADA system has been installed at the plant which will provide alerts to the operator for high levels at the influent pumps and the effluent filters and when there is a power outage at the plant. The system is not yet operable. Please inform this office when the system will go online.
8. The name of the treatment works needs to be included in the operator log book for the facility. Additionally, the arrival time for the operator was noted in the log book, however, the departure time was not included for most entries. Please include departure time so that you have a record of the amount of the time the operator spent onsite.
9. Mr. Griffith indicated that the village has enacted in ordinance for a sewage replacement fund. It is funded by a \$0.50/1000 gallon surcharge on users' sewage bill. Ohio EPA encourages the village to take all precautions necessary to ensure this fund remains dedicated to wastewater plant upgrades or replacement costs and is not used for other village expenses. Please provide to this office a copy of the Village Ordinances that pertain to wastewater.

Please address and provide a response to items #2, 3, 4, 6, 7, 8 and 9 within thirty (30) days upon receipt of this letter.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Attached is a copy of the inspection report. If you have any questions about my inspection, please feel free to contact me by phone (740-380-5418) or email (tim.fulks@epa.state.oh.us).

Sincerely,



Timothy A. Fulks
District Representative
Division of Surface Water

TF/dh

Enclosure

c: Mr. Tim Griffith, Superintendent, Village of Baltic



State of Ohio Environmental Protection Agency
Southeast District Office

Municipal NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
0PB00067*HD	OH0047783	December 5, 2012	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Baltic WWTP 1812 County Road 575 Baltic, Ohio 43804	12:15 p.m.	November 1, 2012
	Exit Time	Permit Expiration Date
	3:30 p.m.	October 31, 2017
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Tim Griffith, Superintendent Richard Honaker, Village Employee	(330) 897-1035	
Name, Address, and Title of Responsible Official	Phone Number	
Mayor and Council 102 West Main Street Baltic, Ohio 43804	(330) 897-4464	

Section C: Areas Evaluated During Inspection

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

Section D: Summary of Findings (attach additional sheets if necessary)

Records/Reports: Exceptionally high flow values submitted in the DMRs for the influent/effluent stations needs to be reviewed for accuracy. The operator log book needs to include the name of the treatment works and also departure times for the operator.

Operations & Maintenance: Weirs in the clarifiers need to be cleaned and excessive vegetation growing out of the aerator disks needs to be removed.

Effluent/Receiving Waters: Two violations of total phosphorus were noted for the review period of January 2011 through October 2012.

Self-Monitoring Program: Buffer solutions for pH meter calibration were expired.

Inspector	Reviewer
 Timothy A. Fulks Division of Surface Water Southeast District Office Date: 12/17/12	 Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office Date: 12/17/12

Sections E through 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..... Y

Comments/Status:

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..... N
- (e) Compliance schedule contained in..... N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection..... N/E

Comments/Status:

Two violations of total phosphorus were noted for the review period of January 2011 through October 2012.

Section G: Operation and 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

100 kW generator capable of operating entire plant
 - ii. How often is the generator tested under load

Every Thursday

- (b) Which components have an alarm system available for power or equipment failures
 Y
- (c) All treatment units in service other than backup units Y
- (d) What method is used for scheduling routine and preventative maintenance (calendar, software, etc.)
 Y
- (e) Any major equipment breakdown since last inspection Y
- (f) Operation and maintenance manual provided and maintained Y
- (g) Any plant bypasses since last inspection N
- (h) Any plant upsets since last inspection N

Comments/Status:

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7) I
- (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) N/E
- (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)
 Y
- (i) Log book kept onsite (in an area protected from weather) Y
- (j) Log book contains the following:
 - I. Identification of treatment works N
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 N
 - 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 needs to identify the treatment works and include departure time for the operator of record. I was unable to evaluate if minimum operator staffing requirements are being fulfilled as the operator log book did not contain departure times.

Collection System:

- (a) Are there pump stations in the collection system N
 - I. How many publicly-owned pump stations equipped with permanent standby power or equivalent N/A
 - II. How many pump stations have telemetered alarms..... N/A
 - III. How many pump stations have operable alarms..... N/A
- (b) Any chronic collection system overflows since last inspection N
- (c) Regulatory agency notified of all overflows Y
- (d) Are there CSOs in the collection system N

If so, what is the LTCP status

N/A
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)

N/A
- (f) Portable pumps available for collection system maintenance Y
- (g) RDII Program established and active Y
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... N
- (j) Is any portion of the collection system at or near dry weather capacity N

Comments/Status:

RDII: Collection system inspections performed with a camera during the summer of 2012 identified seven (7) homes having clean water connections.

Section H: Sludge Management

- (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.

Class A – Exception Quality Sewage Sludge (monitoring station 584)

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% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids
Alternative 1 – Time and Temperature Regime (84369)	<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 – High pH and High Temperature (84369)	<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 – Other Processes (84369)	<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 4 – Unknown Processes (84369)	<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 5 – Composting (84397)	<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 5 – Heat Drying (84397)	<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 5 – Heat Treatment (84397)	<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 5 – Thermophilic Aerobic Digestion (84397)	<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 5 – Beta Ray Irradiation (84397)	<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 5 – Gamma Ray Irradiation (84397)	<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 5 – Pasteurization (84397)	<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 6 – 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"/>

Class B – Sewage Sludge (monitoring station 581)

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% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids	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 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"/>

- (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 3745-40-09) N/A
- (e) Any complaints received in last year regarding sludge N
- (f) 5/8" screen at headworks for facilities that land apply sludge N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit N/A
- (h) Is a contractor used for sludge disposal N
If so, what is the name of the contractor

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor)
- (b) Flow meter calibrated annually Y
Date of last calibration
- (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

Comments/Status:

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 (see GLC page) Y
- (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

Comments/Status:

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N/E
- (b) Do SOP's include the following if applicable N/E

- Title
- Scope and Application
- Summary
- Sample Handling & Preservation
- Interferences
- Apparatus and Materials
- Reagents
- Procedure
- Calculations
- Quality Control
- Maintenance
- 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 N/A
 - (e) Analyses being performed more frequently than required by permit..... N
 - (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
 - (g) Satisfactory calibration and maintenance of instruments/equipment (see score from GLC page) N
 - (h) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: TSS, O&G, Nutrients, Metals, bacteria, CBOD
 Lab name: Coshocton Environmental

Discharge Monitoring Report Quality Assurance (DMRQA)

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

Comments/Status:

Buffer solutions for pH calibration were expired.

Section J: Effluent/Receiving Water Observations

Outfall #: 001
Outfall Description: Final Outfall

Receiving Stream: Brush Run
Receiving Stream Description: No observable impacts to the stream were noted

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work & 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/Status:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
0PB00067*GD	May 2011	001	00665	Phosphorus, Total (P)	30D Qty	0.38	.51003	5/1/2011
0PB00067*GD	July 2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.35	7/1/2012