



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

February 20, 2013

RE: JEFFERSON VILLAGE WWTP
JEFFERSON VILLAGE, ASHTABULA CO.
OHIO EPA PERMIT 3PC00021
COMPLIANCE EVALUATION INSPECTION

Mr. Terry Finger, Village Administrator
Village of Jefferson
98 East Jefferson Street
Jefferson, OH 44047

Dear Mr. Finger:

On February 19, 2013, a site inspection was conducted at the above referenced facility at 225 North Elm Street, Jefferson Village. The inspection was conducted by John Schmidt of this office. Mr. Gary Licate, plant superintendent, represented the Village of Jefferson on the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on March 19, 2012.

The Village of Jefferson collection system consists of two influent lines, one a gravity line serving the western side of town, and the other from the Elm Street pump station serving the east side of town. In 2012, the lines were separated and go through separate bar screens. The system consists of screening and grit removal, parshall flume, lift station, comminutor, equalization basin, primary clarifiers, aeration tanks, division well, clarification, rapid sand filtration, UV disinfection, and post disinfection aeration. Ferric chloride is fed for phosphate control. Sludge management consists of aerobic digestion and settling tanks, dewatering with a belt filter press, with sludge land applied to a local farmer's field as Class B sludge. The facility discharges to Cemetery Creek adjacent to the south side of the facility. Generators provide backup power to the entire facility.

Observations and Notations

Following are observations and notations made during the inspection:

1. Jefferson maintains sheets for recording internal process control data and data reporting as prescribed by the NPDES permit, a facility log, onsite operations and maintenance manuals, and a copy of the NPDES permit. The onsite records document plant operations, equipment inspection and maintenance, and maintaining minimum staffing requirements as required by Ohio Administrative Code (OAC) rule 3745-7-09. Ohio EPA recommends additional detail be provided in the logs, including specific hours worked by licensed operators.
2. Ohio EPA notes that Mr. Licate is a Class III wastewater operator, while remaining WWTP staff are Class I operators. In the event that Mr. Licate is away from the wastewater treatment plant or collection system, there is no Class III or Class II operator in responsible charge of the facility as prescribed by your NPDES permit. Mr. Licate

indicated that two Class 1 Operators are currently taking an Operator Training Committee of Ohio (OTCO) course and have signed up to sit for the May 2013 Class 2 operators' exam. Jefferson should consider having an alternate plan to maintain minimum staffing until these additional operators have secured their Class 2 certifications.

3. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Screenings and grit was containerized for disposal at a solid waste landfill.
4. The influent sampler is maintained at the proper temperature and collects a flow proportional sample.
5. The east primary settling tank was in operations during the inspection, with the west taken out of service to repair damaged flights and chains. The west tank should be repaired and returned to service as soon as possible.
6. The surfaces of the primary clarifiers were clear. The effluent trough was clean and there was no scum around the effluent baffles or the troughs. Weirs and effluent channels are scrubbed weekly.
7. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming.
8. The surfaces of the secondary clarifiers were clear. The effluent trough was clean and there was no scum around the effluent baffles or the troughs. Weirs and effluent channels are scrubbed weekly.
9. The rapid sand filters were in satisfactory operation. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
10. Disinfection is provided by chlorine gas in 150 lb cylinders, but the system was not in operation due to the time of year.
11. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample.
12. The final discharge at the plant was observed at the outlet of the chlorine contact tank and of acceptable visual quality.
13. The final effluent could not be observed due to submergence but was mixing well with the receiving stream.
14. The WWTP laboratory performs monitoring of CBOD, suspended solids, pH, temperature, dissolved oxygen, bacteria (E. Coli), phosphorus, chlorine, and ammonia nitrogen. Jefferson Village contracts with Northcoast Environmental of Streetsboro for metals, oil and grease, nitrate-nitrite, low-level mercury, and quality assurance samples from the WWTP laboratory.

15. Jefferson receives timely industrial pretreatment data from Worthington Cylinders. Jefferson has noted no collection system of wastewater treatment plant issues with the discharge from Worthington Cylinders.
16. A storm water pollution prevention plan (SWPPP) has not been prepared for this facility.
17. A spill of ferric chloride was noted to have occurred at the plant on January 16, 2013. The volume of the spill was noted as less than 100 gallons. The spilled ferric chloride was immediately neutralized with lime. The spill as not reported to Ohio EPA.
18. Plant interference was noted in 2012, possibly due to a new industry that recently commenced operations, the conversion of a former industrial building to a warehouse, or from its industrial discharger regulated by Ohio EPA.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2012 through February 1, 2013 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Limit Violations

No limit violations were noted for the time period reviewed.

Reporting Violations

No reporting violations were noted for the time period reviewed.

Other Violations

The following additional violations of your NPDES permit are noted:

1. **Backup Operator of Record**: As required by Part II, Item A of your permit, the facility must have a Class III Operator in responsible charge. Part II, Item A(2)(e) contains provisions for a Class II operator as a backup operator for up to 30 consecutive days a year that Mr. Licate could be away from the WWTP for vacations, trainings, meetings, etc. Currently, Jefferson has no provisions for a backup operator in the event Mr. Licate is away from his duties. Jefferson must make provisions for a Class II Operator to operate the WWTP in any absence of your primary operator.
2. **Storm Water Pollution Prevention Plan**: Part IV of your NPDES permit requires Jefferson to prepare a storm water pollution prevention plan (SWPPP) for the Jefferson WWTP. Ohio EPA maintains a sample template for a SWPPP in word format online at http://epa.ohio.gov/portals/35/permits/IndustrialStormWater_SampleSWP3Template.doc. Additional information on the storm water program may be found online at http://www.epa.ohio.gov/dsw/storm/industrial_index.aspx and <http://cfpub1.epa.gov/npdes/stormwater/swcats.cfm>. Mr. Licate indicated that Jefferson was in the process of making plant improvements to provide a no exposure certification and modify the permit, but now it looks as if the Village will contract to have the SWPPP prepared. **This document must be prepared as soon as possible.**

Compliance Schedule

Your new NPDES permit, effective October 1, 2010 and modified as of July 1, 2011, contains the following milestones:

Permit Effective Date	Permit Expiration Date	Schedule Date	Due Completion Date	Event Code	Schedule Type	Schedule Milestone
9/2/2010	10/01/2015	10/2/2011	11/10/2011	95999	Other	E. Coli Status Report
9/2/2010	10/01/2015	10/2/2011	11/10/2011	-----	Other	Submit PTI if Needed
9/2/2010	10/01/2015	10/2/2011	11/10/2011	95999	Other	E. Coli Status Report
9/2/2010	10/01/2015	3/02/2012	11/10/2012	05699	Other	Achieve Final Limits

Although some of the milestones were not met on a timely basis, they were met. No additional information is needed concerning the compliance milestones.

Comment

Jefferson WWTP personnel are unaware of the discharge nature of a new business that has commenced operations within the Village in 2012. Ohio EPA recommends that the Village follow-up with this and any other new industry to inquire if they are subject to indirect discharge permit requirements and kindly direct that industry to this office. It may also be helpful to develop a method for other Village departments (building, zoning, water) to notify the WWTP for new industries that locate to the area.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

File: Municipal/Jefferson Village WWTP (Ashtabula Co.)/PC