



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

April 3, 2013

RE: WINDHAM WWTP
PERMIT NO. 3PC00019
PORTAGE COUNTY
WINDHAM

Mayor and Council
Village of Windham
9621 East Center Street
Windham, Ohio 44288

Dear Mayor and Council:

On March 5, 2013, an inspection of the above referenced facility was conducted to obtain and review information for drafting a renewal NPDES wastewater permit. The facility was represented by Mr. Larry Shackelford, Plant Superintendent and Mr. Bill Pennington, Class I Operator. The purpose of the inspection was to: (1) evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. The plant design of the wastewater treatment system is 0.450 MGD
2. In accordance with Ohio Administrative Code 3745-7-04, the sewage treatment facility is classified as a Class II facility. The classification requires that the Operator of Record be physically present at the treatment works five days per week for a minimum of twenty hours per week.
3. The plant is operated by Mr. Larry Shackelford who holds a Class III Wastewater Operators License and Mr. Bill Pennington who holds a Class I Wastewater Operators License.
4. Mr. Shackelford is employed by the Village of Windham 32 hrs/week and Mr. Pennington is a full time employee.
5. Mr. Pennington is scheduled to take the exam for the Class II Wastewater Operators License on May 7, 2013.
6. Ohio EPA has on record that the current Operator of Record is Mr. Donnie Dunavant. The date of notification on record is June 16, 2009. The listed Operator of Record appears to be in error. A new Operator of record form should be submitted immediately.
7. Currently, the plant has been averaging 0.330 MGD since November 1, 2009.
8. The facility's current NPDES permit 3PC00019*ID indicates that the plant is a Class III plant. The renewal NPDES permit will reclassify the facility as a class II facility.
9. During the last inspection, Mr. Pennington indicated that the Village was in discussion with Portage County for the County to buy/operate the WWTP. Mr. Shackelford indicated that he did not believe this to be true anymore.

10. Mr. Shackelford is responsible for submitting the monthly analytical results to Ohio EPA's electronic discharge monitor reporting, e-DMR, system.
11. The facility is equipped with four sludge drying beds.
12. The sludge drying beds are used 1/month most times but often used 2-3 times per month from June through September.
13. Mr. Shackelford indicated that the cost of hauling dry sludge is 1/3 the cost of hauling liquid sludge.
14. The treatment plant's sludge has been transported to a landfill for the past two years. Prior to that, liquid sludge was being hauled to another wastewater treatment plant for further processing.
15. Agrisludge is the contracted sludge hauler.
16. The facility's current permit only authorizes sludge to be land applied (station 581) or taken to a mixed solid waste landfill (station 586). Mr. Shackelford has requested that the permit renewal be drafted to also authorize the Village of Windham to haul liquid sludge to another wastewater treatment plant for further processing (Station 588).
17. Both clarifiers were operational. Minimal pin-floc was observed flowing over the weirs.
18. Seven out of eight floating aerators were being operated in the oxidation ditch. The shafts on all of the floating aerators are being replaced. The motors are being rebuilt as needed.
19. Both tertiary filters were operational.
20. Chlorine gas cylinders (150 lbs) are used for chlorination. Each cylinder lasts approximately fifteen days. Sodium Bisulfite is added for de-chlorination.
21. The effluent in the chlorine contact channel was clear. The bottom of the tank could be observed.
22. A significant amount of algae was present in the chlorine contact channel and also at the discharge point. Mr. Shackelford indicated that it was scheduled to be cleaned out once the weather permits. The chlorine contact channel is maintained three times per year.
23. No impact to the receiving stream was observed.
24. The thermometer in the final automatic effluent sampler indicated that the temperature inside the enclosure was zero degrees centigrade. The temperature inside the effluent sampler should be 4.5 degrees centigrade. Mr. Shackelford indicated that the sampling enclosure heating unit may be broken. This problem should be corrected.
25. A new automatic refrigerated influent sampler was purchased in 2011.
26. The treatment plant has a portable back-up generator, which can also be used at the five lift stations within the collection system. The generator is tested monthly. The battery was replaced in December 2011 and the starter was rebuilt in January 2013.
27. The Village was recently informed that they received a 499,000 dollar grant for wastewater treatment plant upgrades. The Village is required to provide 100,000 dollars matching.
28. The following plant upgrades are being proposed:
 - a. Replace two traveling bridge tertiary filters with one filter, which utilizes filter membrane technology.
 - b. Purchase a 1.5 meter wide belt press.
 - c. Drain the oxidation ditch, remove the grit build-up, inspect it, and make repairs as needed.

This office has recently reviewed your self-monitoring reports covering the period November 1, 2009 through February 28, 2013 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	00530	Total Suspended Solids	2/Week	2	1	06/22/2010
601	80082	CBOD 5 day	2/Week	2	1	06/22/2010
001	00530	Total Suspended Solids	2/Week	2	1	02/22/2012
001	00610	Nitrogen, Ammonia (NH3)	2/Week	2	1	02/22/2012
001	80082	CBOD 5 day	2/Week	2	1	02/22/2012
601	00530	Total Suspended Solids	2/Week	2	1	02/22/2012
601	80082	CBOD 5 day	2/Week	2	1	02/22/2012

Please notify this office in writing, within 14 days receipt of this letter, of your intentions to address item 24.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/cs