



Eden S. Robinson, Governor
Mary Taylor, Lt. Governor
Scott J. Walby, Director

May 17, 2013

Lin Hensley, Village Administrator
Richwood WWTP
153 N. Franklin Street
Richwood, OH 43344

**Re: Richwood WWTP
NPDES Permit 4PB00018/ OH0027260
Reconnaissance Inspection
Union County**

Dear Mr. Hensley:

On May 9, 2013, a Reconnaissance Inspection was conducted at the Richwood WWTP. Present for the inspection were you, the Village Administrator; John Grosse, the Operator of Record; Tim Goodman, a fiscal officer; and Kelly Thiel and myself of the Ohio EPA, Central District Office, Division of Surface Water. Prior to the inspection we had a meeting with Mayor Bill Nibert in addition to everyone previously mentioned.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to discuss the permit renewal.

Findings:

1. Attached are compliance tables between May 2012 and April 2013. The facility has mostly been compliant with permit limits. Regarding the frequency violations in December 2012, I have requested that you or Mr. Grosse re-submit the DMR for the month because no sludge was land applied. Therefore, Outfall 581 should be marked as "No discharge from Outfall." **Please e-mail me when the information has been resubmitted.**
2. In previous inspections, we have discussed the need for I&I reduction. In the past year, the design flow rate was exceeded 8% of the time and since April 2010, the design flow rate was exceeded 20% of the time. In 2012, grant money was used to reduce I&I; the Village has additional funding in 2013 to provide additional work. As we discussed, at this time a compliance schedule will not be imposed with the NPDES renewal, but **I recommend the Village continue to reduce I&I.**
3. The Upper Scioto River Total Maximum Daily Loading (TMDL) report is being drafted. Fulton Creek was found to be in partial or non-attainment of aquatic life uses at each location sampled. One cause of the impairments to the biology was nutrient/low dissolved oxygen. Because Fulton Creek is nutrient enriched a total phosphorus (TP) limit of 1 mg/L for the Richwood WWTP will be recommended in the TMDL report to U.S. EPA. However, because the TMDL has not yet been

approved by U.S. EPA, this permit renewal will only include monitoring of TP during this next permit cycle. **Please be aware that the following permit cycle will likely have TP limits in it.**

4. The renewal permit will also likely have the following changes:
 - a. Fecal coliform will be replaced by to E. coli for all outfalls requiring bacteria sampling.
 - b. Modifying the classification of the plant from Class III to Class II based on design flow.
 - c. Removing the lead limit based on historic non-detects.
5. We discussed staffing requirements for a Class II WWTP. As indicated, Ohio Administrative Code (OAC) rule 3745-7-4(C)(1) requires 20 hours a week over 5 days. There are no additional requirements relating to the time spent per day. Staffing can also be reduced by up to 10 hours but the operator would still need to be there five days a week. Enclosed is a minimum staffing reduction request form if you are interested in pursuing this option.
6. I requested information regarding surrounding Class II plants in surrounding counties. I will include this information and the list of operators from our website in a separate e-mail.
7. The Ohio Rural Community Assistance Program (RCAP) is a potential resource you can use to assist in planning for water and waste water projects. I recommend you contact John Rauch of Ohio RCAP at (740) 989-0596 for additional details.

Attached is the inspection checklist. **A response is requested regarding the December 2012 DMR.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.state.oh.us.

Sincerely,



Cole Miller
Environmental Specialist II
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

NPDES Compliance Inspection Report

SECTION A: NPDES PERMIT DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PB00018	OH0027260	RI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/9/2013	9:30 AM	10:15 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Richwood WWTP	8/1/2008
	Permit Expiration Date
	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Lin Hensley John Grosse Tim Goodman	
Name and Title of Responsible Official	Phone Number
Lin Hensley, Village Administrator	(740) 943-3315

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	
S	Operations & Maintenance	
S	Facility Site Review	
N*	Collection System	Flows exceeded design rate 8% of the time.
S	Flow Measurement	Flow meter last calibrated January 2013.
S	Receiving Waters	
N	Laboratory	MASI does most analyses. Samples are collected on a flow weighted basis.

Comments:

Signatures	
<i>Cole Miller</i> 5/9/13	<i>Erin Sherer</i> 5/13/13
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water District Office

Compliance Data for Richwood WWTP between 5/1/2012 to 4/1/2013

Summary

Permit Effluent Limit Violations: 1
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 14
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	001	Fecal Coliform	7D Conc	2000	10000	7/11/2012

Frequency Violations							
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date	
May 2012	001	CBOD 5 day	2/Week	2	1	5/1/2012	
December 2012	581	Nitrogen Kjeldahl, Tot	1/Year	1	0	12/1/2012	
December 2012	581	Arsenic, Total In Slud	1/Year	1	0	12/1/2012	
December 2012	581	Cadmium, Total In Slud	1/Year	1	0	12/1/2012	
December 2012	581	Copper, Total In Sludg	1/Year	1	0	12/1/2012	
December 2012	581	Lead, Total In Sludge	1/Year	1	0	12/1/2012	
December 2012	581	Nickel, Total In Sludg	1/Year	1	0	12/1/2012	
December 2012	581	Zinc, Total In Sludge	1/Year	1	0	12/1/2012	
December 2012	581	Selenium, Total In Slu	1/Year	1	0	12/1/2012	
December 2012	581	Sludge Weight	1/Year	1	0	12/1/2012	

December 2012	581	Mercury, Total In Slud	1/Year	1	0	12/1/2012
December 2012	581	Molybdenum In Sludge	1/Year	1	0	12/1/2012
December 2012	581	Fecal Coliform in Slud	1/Year	1	0	12/1/2012
December 2012	581	Sludge Fee Weight	1/Year	1	0	12/1/2012

Flow Data for Richwood WWTP between 5/1/2012 and 4/1/2013

	Date	Flows (MGD)
Ten Highest Flows	5/2/2012	1.066
	9/26/2012	0.683
	9/27/2012	0.662
	10/29/2012	0.614
	10/28/2012	0.596
	10/26/2012	0.589
	10/27/2012	0.589
	10/30/2012	0.566
	9/21/2012	0.546
	12/9/2012	0.541
Average Flow Rate		0.206