



John Kasich, Governor
Mary Taylor, Governor
Scott J. Murray, Director

May 24, 2013

Mr. Sterlin C. Mullins, County Engineer
Walnut Heights Subdivision WWTP
207 South Court Street
Circleville, OH 43113

NOTICE OF VIOLATION

**Re: Walnut Heights Subdivision WWTP
NPDES Permit 4PG00018/ OH0101834
Compliance Evaluation Inspection
Pickaway County**

Dear Mr. Mullins:

On May 16, 2013, a Compliance Evaluation Inspection was conducted at the Pickaway County, Walnut Heights Subdivision WWTP. Present for the inspection were Paul Jacobs representing Pickaway County 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. The following items were noted and discussed during the inspection:

- Operation and maintenance at the WWTP is not adequate and must be improved.
 - Bacteria and chlorine residual violations were noted during the last year. The disinfection system consists of jury-rigged components (see attached photos 2 and 3). The distribution boxes for chlorine tablets and dechlorination tablets must be repaired and restored to functionality to promote compliance with effluent limits. Please send confirmation that this has been completed by sending photographs to Paul Vandermeer via e-mail by June 14, 2013.
 - The pretreatment system consists of a garden implement acting as a bar screen (see attached photo 1). Please provide for the installation of a permanent screen by June 14, 2013.

- The pretreatment system consists of a garden implement acting as a bar screen (see attached photo 1). Please provide for the installation of a permanent screen by June 14, 2013.
 - The previous inspection performed on February 17, 2012 and memorialized in a Notice of Violation requested that the backup blower be restored to functionality by March 30, 2012. This has not been accomplished to date. Please confirm with Paul Vandermeer by June 14, 2013 that this blower has been repaired or replaced and restored to functionality.
- Pickaway County has also failed to respond to the previous Notice of Violation for a plan to address inflow and infiltration within the collection system at this facility. The County shall submit a plan to Paul Vandermeer to reduce and/or eliminate the excessive inflow and infiltration by August 30, 2013.
- The operator noted that the air lines in the aeration basin were in need of replacement due to advanced age and deterioration. The county shall provide for replacement of the air lines by August 30, 2013.

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.state.oh.us. Failure to respond to the deadlines noted throughout this inspection report will result in referral for enforcement action.

Sincerely,



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

ec: Paul L. Vandermeer

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODES				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PG00018	OH0101834	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/16/2013	8:55 am	9:50 am	Yes	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Walnut Heights Subdivision WWTP Cornstalk Drive	3/1/2012
	Permit Expiration Date
	2/28/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Paul Jacobs, Sanitary Facilities Operator	(740) 474-3360
Name and Title of Responsible Official	Phone Number
Sterlin C. Mullins, County Engineer	(740) 474-3360

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	See body of cover letter.
U	Operations & Maintenance	See body of cover letter.
M	Facility Site Review	See body of cover letter.
U	Collection System	I&I is a large problem.
N*	Flow Measurement	
N	Receiving Waters	
N	Laboratory	Circleville WWTP provides collection and analytical services.

Comments: *Send confirmation of annual flow meter calibration by e-mail to Paul Vandermeer by June 14, 2013.

Signatures			
	5/17/13		5/17/13
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water District Office	Date

Compliance Data for Walnut Heights Subdivision between 2/1/2012 to 5/1/2013

Summary

Permit Effluent Limit Violations: 9
 Permit Effluent Code Violations: 1
 Permit Effluent Frequency Violations: 2
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	2.0	6.225	7/1/2012
July 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	0.48	.60412	7/1/2012
July 2012	001	Total Suspended Solids	7D Conc	18	30.	7/8/2012
July 2012	001	Chlorine, Total Residu	1D Conc	0.038	.06	7/20/2012
July 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	3.0	9.96	7/22/2012
July 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	0.72	1.04199	7/22/2012
August 2012	001	E. coli	7D Conc	284	3110.	8/15/2012
September 2012	001	E. coli	30D Conc	126	149.	9/1/2012
October 2012	001	E. coli	7D Conc	284	920.	10/1/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
August 2012	001	E. coli	AK	8/1/2012

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2012	588	Sludge Volume, Gallons	1/Year	1	0	12/1/2012
January 2013	001	Turbidity, Severity	1/Day	1	0	1/25/2013

Flow Data for Walnut Heights Subdivision between 2/1/2012 and 5/1/2013

	Date	Flows (MGD)
Ten Highest Flows	3/19/2013	0.088
	5/3/2012	0.060
	2/2/2012	0.060
	2/1/2012	0.064
	5/2/2012	0.063
	3/12/2013	0.063
	3/20/2013	0.059
	3/2/2013	0.059
	3/3/2013	0.059
	3/9/2013	0.059
Average Flow Rate		0.026

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 N*
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process added since last inspection N
- (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: **Inflow and infiltration often causes the flow to exceed design specifications.*

SECTION E: COMPLIANCE

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

Comments: **Some action has been taken for some issues, not for others.*

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available N
If yes, what type?
- (b) Adequate alarm system available for power or equipment failures N

- (c) All treatment units in service other than backup units Y
- (d) Wastewater Treatment Works classification..... I
- (e) Operator of Record holds unexpired license of class required by Permit.. Y
Class held: II
- (f) Copy of certificate of Operator of Record displayed on-site NA
- (g) Minimum operator staffing requirements fulfilled..... Y
- (h) Routine and preventative maintenance scheduled and performed Y/N*
- (i) Any major equipment breakdown since last inspection..... Y**
- (j) Operation and maintenance manual provided and maintained N
- (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 Y^

Comments: *See comments in cover letter. **Air lines are failing and need replacement. ^Hydraulic overloading common during precipitation events.

SECTION G: RECORD KEEPING

- a) Operator log provided..... Y
- b) Format of log book
- 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? ... Y

Comments:

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 N
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection. Y
- 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? N

Comments:

SECTION I: SLUDGE MANAGEMENT

- a) Sludge adequately disposed Y
Method: *Hauled to Carl Wheeler's or disposed in landfill*
- b) If sludge is incinerated, where is ash disposed of NA
- c) Is sludge disposal contracted Y
Name: *Carl Wheeler*
- d) Has amount of sludge generated changed significantly N
- e) Adequate sludge storage provided at plant N*
- 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) N

Comments: **Sludge is sometimes wasted out of the clarifier, but is mostly allowed to overflow into the sand filters where it is caught, dried, and bagged for disposal in a landfill.*

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained NE
Type of device: *Ultrasonic* Device location: *effluent discharge*
- b) Calibration frequency adequate NE
Date of last calibration: *submit proof to Paul Vandermeer by 5/31/13*
- 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)..... NE

Comments:

SECTION K: Laboratory

- a) ~~EPA applicable analytical testing procedures used (40 CFR 136.3).....~~
- b) ~~If alternate procedures are used, are they properly approved?.....~~
- c) ~~Analysis performed more frequently.....~~
~~If yes, are results recorded in permittee's report?.....~~
- d) Commercial laboratory used:
 Name: *City of Circleville*
 Parameters analyzed: *all*
- e) ~~Quality assurance manual provided and maintained.....~~
- f) ~~Calibration and maintenance of instruments is satisfactory?.....~~

Comments: *Section not applicable since the sampling and analysis are performed by an outside contractor, in this case, the City of Circleville.*

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

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

Comments: *Natural gas pipeline construction activities limited travel to the outfall.*



Photo 1. Note garden fork used for screening and the increasing level of deterioration (rust) of the headworks.

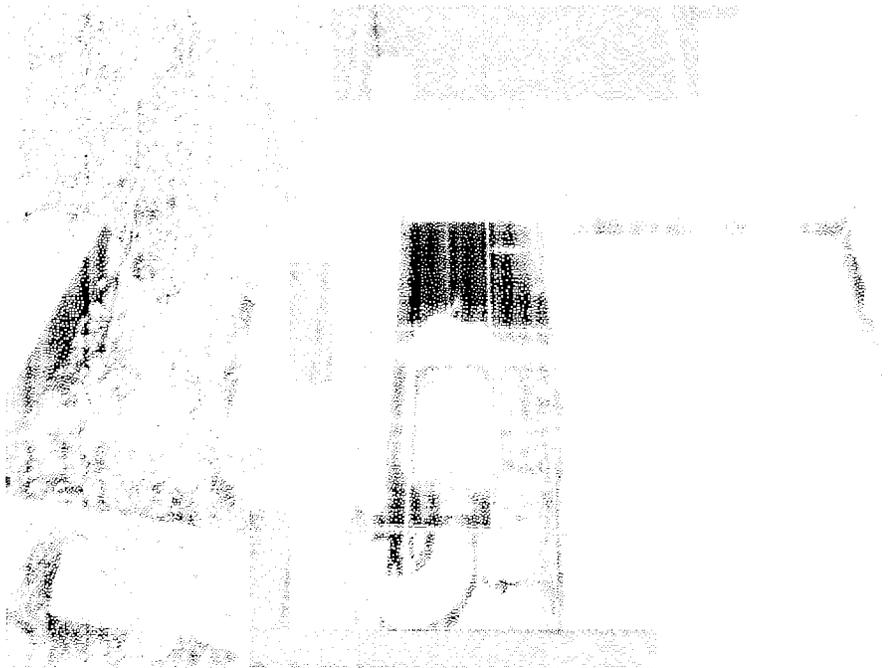


Photo 2. The chlorination unit is not functional. Note gallon milk jug suspended by a yellow rope. This holds the chlorine tablets. There have been violations of bacteria limits in the last year so the current system does not promote compliance with permit limits.

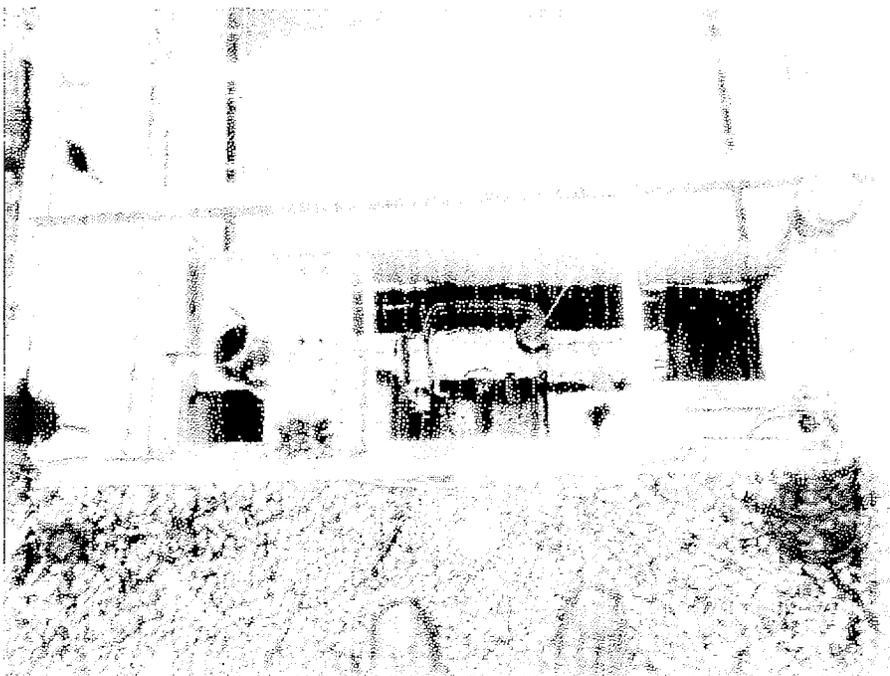


Photo 3. The dechlorination unit is not functional. Violations of chlorine residual have been recorded, so the current system does not promote compliance with permit limits.