



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

July 25, 2013

Re: Jackson County
Wellston North Water Treatment Plant
Compliance Evaluation Inspection
Ohio EPA Permit 0IV00120*FD

Mayor and Council
City of Wellston
203 E. Broadway
Wellston, Ohio 45692

Dear Mayor and Council:

On July 2, 2013, Ohio EPA conducted a compliance evaluation Inspection at the Wellston North Water Treatment Plant (WTP). Adam Peters, Plant Manager, represented the City of Wellston and accompanied Ohio EPA during the inspection. The purpose of the inspection was to determine the Wellston North WTP's compliance with NPDES Permit Number 0IV00120*FD and the Ohio Water Pollution Control Act, Revised Code Chapter 6111.

As a result of the inspection and review of our files, I have the following comments:

1. The Wellston North WTP reported the following exceedances of effluent limitations since January, 2010.

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|--------------------------|------------|-------|----------------|----------------|
| 002 | 50060 | Chlorine, Total Residual | 1D Conc | 0.019 | .09 | 1/28/2010 |
| 601 | 31616 | Fecal Coliform | 30D Conc | 1000 | 1045 | 6/1/2011 |
| 002 | 00400 | pH | 1D Conc | 10.0 | 1000. | 4/13/2013 |
| 002 | 00400 | pH | 1D Conc | 10.0 | 1000. | 4/28/2013 |

NOTES: 1D Conc = Daily Concentration Value
1D Qty = Daily Loading Value
7D Conc = Weekly Average Concentration Value
30D Conc = Monthly Average Concentration Value
7D Qty = Weekly Average Loading Value
30D Qty = Monthly Average Loading Value

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

It appears that the pH limit violations noted above may be due to a reporting problem. Please make any corrections needed by submitting amended DMRs to Ohio EPA and provide an explanation in your response to this letter.

Please investigate the causes of the above violations and provide a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

2. I reviewed Wellston North WTP's treatment processes and wastewater sources during the inspection. The North WTP produces roughly .65 mgd finished water. Water is supplied from Little Raccoon Creek or Lake Alma. The raw water is first aerated. Sodium permanganate, activated carbon, lime, chlorine and alum are then added prior to flocculation and clarification. Next chlorine is added prior to sand filtration. Additional chlorination may occur before the water enters one of two clear wells. Clarifier sludge and filter backwash are routed to a backwash tank, then to one of two concrete lagoons for dewatering. Wastewater from lagoon sludge dewatering flows out through a gate where planks are used to control the water level, and into a trench drain. Wastewater is also generated from sludge dewatering which occurs on an adjacent storage pad, along with stormwater that falls on the storage pad. The sludge pad wastewater flows to the backwash tank. Wastewater from the lagoons discharges to Little Raccoon Creek through Outfall 002.
3. Sanitary sewers are not available. Sewage is treated in an Oldham sewage treatment system. The treatment system consists of a trash trap, aeration basin with built in clarifier, and upflow sand filter followed by chlorine disinfection. Ohio EPA's records indicate that a 500 gpd unit was proposed. However, the 500 gpd unit shown did not include a trash trap, which came with the 1000 gpd model. Please review the City's records and notify Ohio EPA which model treatment system was installed.

The treated sewage was reported to discharge to the backwash tank through Outfall 601. Samples are collected from a pipe which enters the backwash tank. More flow than expected was present in the pipe at the time of the inspection. Please investigate the wastewater sources present at the sampling station through dye testing or other means to determine or verify: 1. That the treated sewage is discharged at that location and 2. Whether there are any other sources of wastewater present at the sewage system sampling station. Please notify Ohio EPA of your findings.

At the time of the inspection, we were unable to determine the amount of sludge present in the three units of the sewage treatment system. Please obtain the necessary equipment to estimate the sludge accumulations and have the treatment system serviced if needed. Please notify Ohio EPA of your findings.

4. Wellston North WTP's NPDES permit was renewed with an effective date of June 1, 2013. Outfall 003, the discharge from the backwash tank directly to Little Raccoon Creek, was removed from the permit. I verified that the discharge pipe had been sealed off during the inspection. Please note that the permit requires installation of a sign identifying the discharge at Outfall 002 not later than October 1, 2013.

Please respond to this letter in writing, within 30 days. If there are any questions, please contact me at (740) 380-5423.

Sincerely,



Fred J Snell
District Representative
Division of Surface Water

FJS/dh

Enclosure

c: Adam Peters, Plant Mgr., City of Wellston WTP



State of Ohio Environmental Protection Agency
Southeast District Office

Industrial NPDES Compliance Inspection Report

| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES # | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| OIV000120*FD | OH0031780 | 7/2/2013 | C | S | 2 |

| Section B: Facility Data | | |
|--|-----------------|------------------------|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| Wellston North WTP SR 349 Wellston, Ohio 45692 | 10:00 am | 6/1/13 |
| | Exit Time | Permit Expiration Date |
| | 11:00 am | 5/31/18 |
| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) | |
| Adam Peters, Plant Manager | 740 384-6274 | |
| Name, Address, and Title of Responsible Official | Phone Number | |
| Mayor and Council, City of Wellston 203 E. Broadway, Wellston, Ohio 45692 | | |

| 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 |
| S | Records/Reports | S | Laboratory | S | Compliance Schedules |
| S | Operations & Maintenance | S | Effluent/Receiving Waters | S | Self-Monitoring Program |
| S | Facility Site Review | S | Sludge Storage/Disposal | | Other |
| S | Collection System | | | | |

| Section D: Summary of Findings (attach additional sheets if necessary) | | | |
|---|--|--|--|
| See attached letter. | | | |
| Inspector | | Reviewer | |
| <i>Fred J. Snell</i> | | <i>Jennifer M. Witte</i> | |
| 7/29/13 | | 7/29/13 | |
| Date | | Date | |
| Fred J. Snell Division of Surface Water Southeast District Office | | Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office | |