



John E. Kasich, Governor
Richard D. Taylor, Lt. Governor
Robert J. Jolly, Director

Certified Mail #91 7108 2133 3932 1837 9802

August 19, 2013

Tiffany Jenkins, P.E. Director of Environmental Services
Delaware County Regional Sewer District
101 N Sandusky Street
Delaware, OH 43015

NOTICE OF VIOLATION

**Re: Scioto Reserve Wastewater Reuse Facility
NPDES Permit 4MP00009/ OHLANDAPP
Reconnaissance Inspection
Delaware County**

Dear Ms. Jenkins:

This correspondence serves as **Notice of Violation** for Significant Non-Compliance with the permit limits contained in the Land Application Management Plan issued to the Scioto Reserve Wastewater Reuse Facility in Delaware County, Ohio.

On July 22, 2013, a Reconnaissance Inspection was conducted at the Scioto Reserve Wastewater Reuse Facility. Present for the inspection were Mark Chandler, Cory Smith and Walt Thompson representing the Delaware County Regional Sewer District 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 Land Application Management Plan (LAMP) and to discuss the plans for achieving compliance with final limits for Total Inorganic Nitrogen (TIN) limits by October 2014.

Findings:

1. **Significant Non-Compliance** - The plant is currently in Significant Non-compliance (SNC) for violations of the E. coli limits contained in the LAMP. A facility is placed in SNC when limits for conventional parameters are exceeded by 40% in any two months in a six month period. In order to be removed from the SNC list, the county must comply with all E. coli limits for three consecutive months. Failure to comply with the terms of conditions of the LAMP is a violation of Ohio Administrative Code (OAC) 3745-42-13. The County has installed a chlorine feed system to replace the non-functional ultraviolet disinfection system to facilitate compliance with the E. coli limit.

2. The County has begun to modify the first third of the aeration tank to create an anoxic zone. A baffle was installed and the diffusers have been removed from this section of tank. A surface mixer will be installed to provide mixing. This work will allow the County to determine if these modifications are sufficient to meet the TIN limit of 10 mg/l or if additional piping changes will be required before the final limit goes into effect.

3. **Ground Water Monitoring Exceedances** - The groundwater monitoring data collected on May 9, 2013 (submitted with June 2013 eDMR data) showed E. coli concentrations too numerous to count in three of the eight ground water monitoring wells. Please be advised that OAC 3745-42-13 (L)(4)(g), requires that any sampling result that exceeds established "trigger" values (nitrate + nitrite > 5 mg/L, chloride > 125 mg/d or detection of E. coli) must be reported to Ohio EPA within 15 days of receiving the result. Groundwater monitoring results that indicate potential impacts will trigger additional requirements and action by the permittee. However, if resample results can be provided that are below these reportable concentrations, it would demonstrate that adverse groundwater impacts are not probable. Therefore, it is beneficial to the permittee to resample. **It will be necessary to resample monitoring wells 704, 704 and 708 for E. coli, as soon as possible to resolve possible discrepancies or clarify concerns regarding the integrity of the ground water monitoring data. Please resample for E. coli within 14 days of the receipt of this correspondence and submit the results to this office as soon as they are available.**

Please refer to the Summary of Findings and Comments section of this report for additional information regarding the inspection. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at mike.sapp@epa.state.oh.us.

Sincerely,



Michael Sapp
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

c: Cory Smith w/attachments

ec : Michael Sapp

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4MP00009	OHLANDAPP	FI	S	Public
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
7/22/2013	10:55 AM	12:00 PM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Scioto Reserve Wastewater Reuse Facility 7741 Riverside Drive Delaware, Ohio 43015	4/1/2013
	Permit Expiration Date
	10/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Mark Chandler, Operations Manager Cory Smith, Operations Supervisor Walt Thompson, Plant Operator	(740) 549-1906 (937) 243-7413
Name and Title of Responsible Official	Phone Number
Tiffany Jenkins, Director of Environmental Services	(740) 833-2240

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	
S	Collection System	
S	Flow Measurement	
M	Receiving Waters	Marginal due to SNC with E. coli limits
N	Laboratory	

Comments:

Signatures	
 7/25/13	 7/31/13
Michael Sapp, Inspector Date Compliance & Enforcement Division of Surface Water District Office	Erin Sherer, Reviewer Date Compliance & Enforcement Supervisor Division of Surface Water District Office

Compliance Data for Scioto Reserve Wastewater Reuse Facility between 1/1/2013 to 7/1/2013

Summary

Permit Effluent Limit Violations: 8
 Permit Effluent Code Violations: 3
 Permit Effluent Frequency Violations: 0
 Compliance Schedule Violations: 2

4 Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Violation	
					Value	Date
January 2013	601	E. coli	1D Conc	126	340.	1/2/2013
January 2013	601	E. coli	1D Conc	126	190.	1/3/2013
January 2013	601	E. coli	1D Conc	126	137.	1/8/2013
February 2013	601	E. coli	1D Conc	126	133.	2/26/2013
March 2013	601	E. coli	1D Conc	126	520.	3/5/2013
March 2013	601	E. coli	1D Conc	126	135.	3/12/2013
March 2013	601	E. coli	1D Conc	126	330.	3/20/2013
May 2013	601	E. coli	1D Conc	126	330.	5/1/2013

Code Violations

Reporting Period	Station	Parameter	Reported Value	Violation Date
June 2013	704	E. coli	AK	6/1/2013
June 2013	706	E. coli	AK	6/1/2013
June 2013	708	E. coli	AK	6/1/2013

1/2/2013
 1/3/2013
 1/8/2013
 2/26/2013
 3/5/2013
 3/12/2013
 3/20/2013
 5/1/2013

ADDITIONAL INFORMATION
Scioto Reserve Wastewater Reuse Facility

General

The Scioto Reserve facility has a design treatment capacity of 423,000 gpd with a peak hydraulic capacity of 1.41 MGD. Wet stream process provided at the facility include an influent lift station, hydrasieve static screen, flow equalization, extended aeration biological treatment, clarification, tertiary sand filtration, ultraviolet disinfection, effluent pump station and treated effluent storage. Solids handling facilities consist of limited digestion, sludge storage followed by hauling to OECC for further processing. Treated effluent is stored in an effluent storage impoundments, providing 120 days storage, before it is land applied on the Scioto Reserve Golf Course.

1. The current average influent flow is 235,000 gpd. The highest daily flow experienced this year was 304,000 gpd. Plant staff indicated that this facility will likely be abandoned when plant the influent flows increase significantly. Flows from this development will be sent to the Butts Road pump station which will convey the flow west across the Scioto River to the Lower Scioto Water Reclamation Facility. A portion of the treated effluent will be returned to Scioto Reserve for irrigation purposes.
2. At the time of the inspection all treatment units were functional with the exception of the ultra violet disinfection unit. Only one of the two treatment trains was in service due to low flows. The aeration train out of service was being modified to create an anoxic zone in the first third of the tank. The second treatment train will be modified when an increase in flow necessitates the use of both aeration trains.
3. The aeration blowers are operated in an on/off mode of operation (one hour on followed by one hour off).
4. The plant runs best at a target spin test result of 2%. Sludge is hauled daily in order to main the lower solids inventories under aeration. The plant experiences foaming problems when solids concentrations are higher.
5. Flows are measured using an ultrasonic unit over the effluent weir. This unit was last calibrated in April 2013. Effluent samples are collected using a composite sampler. The sampler collects a 24-hour composite sample.
6. The County recently installed a chlorine feed system for disinfection after the ultraviolet disinfection unity went down in January 2013. Plant staff anticipate that the chlorine system will address non-compliance issues with E.coli limits.
7. The LAMP contains a schedule of compliance to meet a final TIN limit of 10 mg/l on or before October 1, 2014. The plant has reported an average TIN concentration of 12.39 mg/L since April 2013. Plant staff have begun work to

modify the first third of the aeration tank to create an anoxic zone. A baffle has been installed and the diffusers have been removed from this section of tank. A surface mixer will be installed to provide mixing. This work will allow the County to determine if these modifications are sufficient to meet the TIN limit of 10 mg/l or if additional piping changes will be required before the final limit goes into effect. Please be aware that the compliance schedule requires a status report on plans to meet the final TIN limit by October 1, 2013.

8. The groundwater monitoring data collected on May 9, 2013 (submitted with June 2013 eDMR data) showed E. coli concentrations too numerous to count in three of the eight ground water monitoring wells. Please be advised that OAC 3745-42-13 (L)(4)(g), requires that any sampling result that exceeds established "trigger" values (nitrate + nitrite > 5 mg/L, chloride > 125 mg/d or detection of E. coli) must be reported to Ohio EPA within 15 days of receiving the result. Groundwater monitoring results that indicate potential impacts will trigger additional requirements and action by the permittee. However, if resample results can be provided that are below these reportable concentrations, it would demonstrate that adverse groundwater impacts are not probable. Therefore, it is beneficial to the permittee to resample. **It will be necessary to resample monitoring wells 704, 704 and 708, for E. coli, as soon as possible to resolve possible discrepancies or clarify concerns regarding the integrity of the ground water monitoring data. Please provide a schedule, within 14 days of the receipt of this correspondence, for the resampling of these wells.**