



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

August 26, 2013

Mr. Joe Sampson
Village Administrator
Village of Saint Paris
P.O. Box 572
Saint Paris, Ohio 43072

**RE: Village of Saint Paris WWTP Compliance Evaluation Inspection,
NPDES Permit No. OH0021806/ OEPA Permit No. 1PB00029*GD**

Dear Mr. Sampson:

On August 15, 2013, Joe Reynolds and I conducted an NPDES Compliance Evaluation Inspection at the village of Saint Paris WWTP. You along with Tim Thornburg, Operator in Training, and Ben Shuman, Operator I, were present for the facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

The Records/Report section of the evaluation received a "Marginal" rating due to the Operator of Record logbook not meeting all requirements. Every other area evaluated was rated as "Satisfactory". Please pay attention to the "Items Requiring Correction" (shown in bold type) within the report.

A copy of the inspection report is enclosed.

If you have any questions, please contact me by phone at (937) 285-6028 or by email at michelle.waller@epa.ohio.gov.

Respectfully,

A handwritten signature in cursive script that reads "Michelle Waller".

Michelle Waller
Environmental Specialist II
Division of Surface Water

MW/tb

Enclosures



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00029*GD	OH0021806	8/15/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected Village of St. Paris WWTP 454 Huffman Drive St. Paris, Ohio	Entry Time	Permit Effective Date
	10:10 am	10/1/2008
	Exit Time	Permit Expiration Date
	12:05 pm	9/30/2013
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Joe Sampson – Village Administrator		(937) 633-4329
Tim Thornburg, Operator in Training		(937) 633-5523
Ben Shuman, Operator I		(937) 633-5523
Name, Address and Title of Responsible Official		Phone Number
Joe Sampson – Village Administrator P.O. Box 572 Saint Paris, Ohio 43072		(937) 633-4329

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
M	Records/Reports	S	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
Please see attached inspection report.			
Inspector		Reviewer	
<i>Michelle Waller</i>		<i>Marty Burt</i>	
Michelle Waller	8/23/13	Marty Burt	8/26/13
Division of Surface Water	Date	Compliance & Enforcement Supervisor	Date
Southwest District Office		Division of Surface Water	
		Southwest District Office	

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... N
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

c.) Saint Paris installed a UV system to replace the chlorination/dechlorination system on August 14, 2013, and the UV was operational by August 15, 2013. The UV system contains 2 banks, and is rated for a total of 2.8 MGD. St. Paris plans to run only one bank at a time (1.4 MGD).

e.) Last summer, the outfall 001 was moved upstream from its previous location. The new NPDES permit reflects the new GPS coordinates of the outfall.

St. Paris submitted the permit renewal application on April 10, 2013.

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... N/A
- (c) Permittee is taking actions to resolve violations..... N/A
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

A compliance scan was run for the month of July and no compliance issues were noted.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
 - i. What does the back-up power source operate.....

The generator powers everything at the plant except the digesters.
 - ii. How often is the generator tested under load.....

It is tested once a week.
- (b) Which components have an alarm system available for power or equipment failures.....

Everything has alarms – tied into SCADA.
- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

Calendar.
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... N/A
- (h) Any plant upsets since last inspection..... N

Comments/Status:

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y

- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... Y
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

2 books are maintained. One is only for the operator of record to track sign-in/sign-out and one contains the maintenance records. The books are hard bound but do not contain consecutively numbered pages.
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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 operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... N
 - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 4
 - ii. How many pump stations have telemetered alarms..... 4
 - iii. How many pump stations have operable alarms..... 4
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N/A
- (d) Are there CSOs in the collection system..... N
if so, what is the LTCP status.....

- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....

- []
- (f) Portable pumps available for collection system maintenance..... Y
 - (g) RDII Program established and active..... Y
 - (h) Any WIB complaint received since last inspection..... N
 - (i) Is there a WIB response plan..... Y
 - (j) Is any portion of the collection system at or near dry weather capacity..... N

Comments/Status:

During large rain events, up to 1.4 MGD has been pushed through the plant with no violations occurring.

St. Paris is working with Choice One Engineering on looking at I&I in the system. St. Paris has received a quote to flow meter some of the manholes to do a study for I&I to locate problem areas. The village may implement that study this year.

St. Paris has used cameras to look at the system in the past.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....
[75 dry tons, approximately 20 tons are shipped out per year.]
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y
- (h) Is a contractor used for sludge disposal..... Y
If so, what is the name of the contractor.....
[Greyhound Transport takes sludge to Cherokee Run Landfill.]

Comments/Status:

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Section I: Self-Monitoring Program

Flow Measurement:

(a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

V-notch weir based off of pressure transducer.

(b) Flow meter calibrated annually Y

(Date of last calibration: 8/15/13)

(c) 24-hour recording instruments operated and maintained..... Y

(d) Flow measurement equipment adequate to handle full range of flows..... Y

(e) All discharged flow is measured..... Y

Comments/Status:

Section I: Self-Monitoring Program (con't)

Sampling:

(a) Sampling location(s) are as specified by permit..... N

(b) Parameters and sampling frequency agree with permit..... Y

(c) Permittee uses required sampling method..... Y
(see GLC page)

(d) 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)..... Y

Comments/Status:

Outfall 001 has been moved since the last permit was written. New Lat/Long reflected in renewed permit. Outfall 901 sampling location has been moved to approximately 200 yards downstream from the new 001.

Section I: Self-Monitoring Program (con't)

Laboratory:

General

(a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y

- (b) Do SOP's include the following if applicable..... Y
- Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
(d) If alternate analytical procedures are used, proper approval has been obtained..... Y
(e) Analyses being performed more frequently than required by permit. N
(f) If (e) is yes, are results in permittee's self-monitoring report.....N/A
(g) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Everything but Cl, pH and DO.

Lab name: Masi

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N
Date:
(b) Were any parameters "Unsatisfactory"..... N/A
(c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Outfall pipe to tributary.

Receiving Stream: Tributary to Nettles Creek

Receiving Stream Description: Clear, no foam, no solids

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Items Requiring Correction

1. Currently all daily information by the operator is recorded in a bound book with no page numbering. Ohio Administrative Code 3745-7-09 requires hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or password protected computer logs. These are required to guarantee authenticity of the data. **Replace the unnumbered book with a method consistent with OAC 3745-7-09.**