



Public Utilities Department
Division of Wastewater

Memo

To: Mayor Kalb
From: Director of Wastewater
CC: City Council
Date: 22 December 2005
Re: Response to Compliance Evaluation Report-Ohio EPA

RECEIVED

DEC 22 2005

CITY CLERK'S OFFICE

Jim,

Attached is a copy of my response to Michael Yandrich of the Ohio EPA, regarding our October 6 plant inspection. The deadline for response was 12/21/05. I faxed it to Mr. Yandrich yesterday and I am mailing the original to him today.

Let me know if you have any questions.

Sincerely,

Richard Duncan
Director of Wastewater
City of Portsmouth



Public Utilities Department

City of Portsmouth, Division of Wastewater

2040 Charles Street, Portsmouth, OH 45662

740-353-0241

December 21, 2005

Michael Yandrich
Division of Surface Water
Ohio EPA-SE District Office
2195 Front St
Logan OH 43138

Re: Compliance Evaluation Report, dated 11/22/05

Dear Mr. Yandrich:

I have reviewed your inspection report. I am pleased to provide the following responses to your concerns:

1. Grit collection.

The Lawson Run Plant has two grit collection systems that normally operate in series. The "old" grit system was installed in 1955. The "new" grit system went into service in 1988.

The old grit collector is the more efficient of the two and removes 80 to 90% of the grit that comes into the plant. The old collector is more reliable as well. It requires less maintenance than the new system which tends to break down frequently due to blockages in the grit piping. At the time of the inspection, plant personnel were working on a number of maintenance problems that were deemed to be more pressing than the new grit collector, which generally functions as a back-up system.

However, the new grit collector is now back in service and operating properly. We are currently evaluating the new grit system to determine if it needs to be replaced or redesigned to reduce maintenance and breakdowns.

With regard to the old grit collector, plant personnel refurbished it earlier this month, replacing deteriorated mortar and worn parts and making needed mechanical adjustments.

Both grit systems are working properly at present.

2. South Trickling Filter-Leaking Joints

The Trickling Filters were constructed in 1978. No major work has been performed on them since that time. The filters are currently functioning properly, except for the leaking joints on the south unit. Since receiving your inspection report, we have had two local contractors inspect them. We expect to receive

estimates by the week of January 1, 2006 to replace all of the joints on the South Tower. We intend to include the project in the 2006 capital budget for completion by mid-year.

Please note that none of the leakage from the south unit actually bypasses the treatment process. All of the leakage is conveyed by drains to the head of the plant for treatment.

3. Secondary Settling Tanks-Sludge Build up

Our secondary tanks are normally cleaned on a biweekly basis and we have found that to be sufficient to avoid operating problems and to keep us from violating permit limits. The tanks were cleaned on October 1, prior to your October 6 inspection, so I am surprised that there was an excessive sludge build-up. However, based on your recommendation we will increase the frequency of clarifier cleaning during warm weather when algae growths are common.

4. Sludge Digesters

The failing condition of the anaerobic digesters has been cited in EPA inspection reports in 1999, 2000, 2001, and 2003. I have advised the mayor, the city auditor and city council that returning these units to service should given the highest priority, and they have indicated their support for this project.

We are considering conversion to a Thermal Process ATTAD (aerobic) system, which we believe will have a lot of advantages compared to anaerobic operation. However, we may consider new anaerobic equipment, if the ATTAD system will not work or is too costly. We are no longer considering a lime stabilization-based solution due to dust and disposal concerns and high operating and start up costs. We have applied for grant funds through the Ohio Public Works Commission to partially finance the project and we intend to apply for funding from additional sources.

We plan to complete preliminary engineering early next year and final engineering by summer. We plan to go out for bids and start construction in July 2006. Hopefully, the new system will be in service before the end of 2006.

5. Combined Sewer Overflows
Residential Basement Flooding

Stilson Consultants is preparing the City's Long Term Control Plan for Combined Sewer Overflows which, according to our NPDES Permit, must be submitted to OhioEPA by September 1, 2006. We plan to meet with you and Mr. Goff in January to discuss the draft plan and to provide a progress report. The plan will address basement flooding concerns. Also I will be meeting with Southern Ohio Medical Center officials in early 2005 to discuss drainage issues that are believed to contribute to basement flooding. I will advise you of progress in that area.

6. Nine Minimum Controls
Long Term Control Plan

The City has implemented the Nine Minimum Controls and is proceeding with the Long Term Control Plan. We plan to meet with you and Mr. Goff in January to discuss the draft plan and to provide a progress report.

7. Monitor All Sewer Projects Associated with the Lawson Run Plant

The City currently monitors and inspects installation of all sewers.

Finally, on page one, Section C of the "NPDES Compliance Inspection Report," you give the City satisfactory marks for all areas except for "Sludge Storage/Disposal" and "Collection System," which you classify as marginal. The marginal rating for "Sludge Storage/Disposal" may be appropriate since our digesters are out of service.

However, our collection system is well maintained and I do not recall it being evaluated during your inspection. I respectfully request that the marginal rating for the collection system be reconsidered.

Please contact me at 740-353-0241, if you have any questions regarding my response. Thank you.

Sincerely,



Richard Duncan, PE
Director of Wastewater

cc: Mayor
City Council
Chief Operators
Sewer Supervisor
File

Bob Mollette

3rd Ward Councilman

1705 Franklin Blvd.
Portsmouth, Ohio 45662

Phone: 740-353-0099
email: mollette@mollette.info
website: www.mollette.info

Correspondence#: 05-019

December 6, 2005

Jim Kalb, Mayor
728 Second Street
Portsmouth, Ohio 45662

Re: OhioEPA Inspection at the Lawson Run Wastewater Plant

I reviewed Council's copy of the OhioEPA, Division of Surface Water correspondence dated November 22, 2005 which documented a compliance inspection at the above wastewater treatment plant on October 6, 2005.

Observations by OhioEPA were noted and issues identified:

1. Requested both grit collectors to be maintained in good repair at all times.
2. Requested a time frame for repairs to the tricking filter joints on the south tower.
3. Requested routine maintenance of sludge build-up on the secondary settling tank outflow weirs.
4. Requested progress toward rehabilitating the anaerobic digesters which have been documented offline. Referenced a letter from OhioEPA dated 9/26/03.
5. Requested progress minimizing or eliminating combined sewer overflows and basement flooding. I am requesting copies of the reports and complaints for the last two years referenced in the issue of residential flooding.
6. Requested progress towards meeting the September 1, 2006 NPDES requirement for a Long Term Control Plan on combined sewers.
7. Requested close monitoring of all sewer projects associated with the Lawson Run plant to minimize potential for increased infiltration from new sewers.

The OhioEPA requested the noted deficiencies to be addressed by December 21, 2005. Please forward to me any correspondence on actions taken related to this matter. Also, the 2006 City of Portsmouth Operating Budget is currently being evaluated by Council and the Capital Improvements Projects will follow. Provide pertinent information to allow appropriate funding as needed to improve our infrastructure to meet the future demands on our services and protect our property owners without delay.

Thanks in advance for your cooperation and contact me should you have any questions.

Respectfully,



Bob Mollette, 3rd Ward Council

rwm

CC: Engineering Department
Rick Duncan, Director of Wastewater
Jo Ann Aeh, City Clerk (Record)
Council (5)



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

November 22, 2005

Re: Scioto County
City of Portsmouth
POTW Inspection
Correspondence (PWW)

Mayor and Council
City of Portsmouth
732 Second Street
P.O. Box 1304
Portsmouth, Ohio 45662

Mayor and Council Members:

On October 6, 2005 Ohio EPA, Division of Surface Water conducted a compliance inspection at the City of Portsmouth's Lawson Run wastewater treatment plant. Richard Duncan accompanied me through the plant as I evaluated the City of Portsmouth's compliance with the Ohio Water Pollution Control Act, Ohio Revised Code (ORC) Chapter 6111 and NPDES permit #OPD00013*KD. During the inspection, we also reviewed deficiencies identified during the last inspection in September, 2003.

As a result of my observations, the following issues were identified:

1. The "new" grit collector was not operable at the time of my observation, and has been down for approximately 2 months. The old grit collector was still operating. The City of Portsmouth should work to bring this unit back into operation as soon as possible. Please indicate steps that the City of Portsmouth will take to ensure that both grit collectors are maintained in good repair at all times.
2. The trickling filter joints were leaking on the south tower. The City of Portsmouth must repair these joints as soon as possible. Leaks such as these constitute a bypass. Please provide a time frame for these repairs to be made.
3. A sludge build-up was noted on the secondary setting tank outflow weirs. The City of Portsmouth must adjust maintenance activities as plant conditions change. Please indicate changes that the City of Portsmouth will make to routine maintenance activities to address this issue.
4. The anaerobic digesters are still off-line. In a letter dated September 26, 2003, Bob Little indicated a need for the City of Portsmouth to upgrade the anaerobic digester units and bring them into operation. These units need to be replaced as soon as possible. Please provide documentation indicating the City of Portsmouth's progress toward rehabilitating the digesters.

5. There have been several combined sewer overflows reported over the past two years, including reports and complaints of residential basement flooding. Please provide an update addressing City's progress toward minimizing or eliminating combined sewer overflows and basement flooding.
6. The City of Portsmouth is required to implement the "Nine Minimum Controls" for the combined sewer collection system. Additionally, the City is required by NPDES permit #OPD00013*KD to complete a Long Term Control Plan for the combined sewers by September 1, 2006. Please provide an update on the City's progress toward meeting this requirement.
7. The City of Portsmouth is encouraged to closely monitor all sewer projects associated with the Lawson Run plant. Frequent inspections during the installation of sewers by an experienced individual will help to prevent poor quality construction. Doing so will also minimize the potential for increased inflow and infiltration from new sewers.

Please address the above noted deficiencies by December 21, 2005. If you have any questions, please contact me at (740) 380-5447.

Sincerely,



Michael Yandrich
District Representative
Division of Surface Water

MY/dh

Enclosures

c: Richard Duncan, City of Portsmouth

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00013*KD	OH0027197	October 6, 2005	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Portsmouth Wastewater Treatment Plant - Lawson Run 2040 Charles Street Portsmouth, Ohio 45662	-12:00 p.m.	June 1, 2004
	Exit Time	Permit Expiration Date
	-1:30 p.m.	January 31, 2009

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Richard Duncan, Scott Foster	(740) 353-0241
Name, Address and Title of Responsible Official	Phone Number
Richard Duncan, Director, Waste Water Division	


C. AREAS EVALUATED DURING INSPECTION

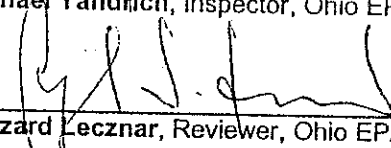
<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>N</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>N</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>M</u> Sludge Storage/Disposal	<u>N</u> Other
<u>M</u> Collection System		

S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

- See the attached inspection letter and report. Overall, the plant was in substantial compliance with the permit.
- Several combined sewer overflows have been reported since the last inspection. This issue needs to be addressed.
 - Sludge digesters are still not operable.
 - Trickling filter joints are in need of repair.


Michael Yandrich, Inspector, Ohio EPA, Southeast District Office


Ryszard Lecznar, Reviewer, Ohio EPA, Southeast District Office

11/23/05
Date

11/23/05
Date