



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: Central Hampshire Public Service District – Frenchburg WWTP

Facility Location: 39.31629, -78.65705

Mailing Address: RR 1 Box 84, Augusta, WV 26704

Report Prepared on: 8/16/2021
Date

By: , PG
Environmental Scientist (PG Environmental)
Signature

Report Final as of: _____ By: _____, EPA
Date *Signature*

General Information

Type of Inspection:	Wastewater Treatment Facility CEI
Owner:	Central Hampshire Public Service District (PSD)
Operator:	Central Hampshire PSD
Permittee:	Central Hampshire PSD
NPDES Permit No:	WV0081850
NPDES Permit Effective Date:	June 1, 2020
NPDES Permit Expiration Date:	April 27, 2025
Receiving Water:	Little Cacapon River
Latitude and Longitude:	39.315994, -78.655858

On-Site Facility Inspection Overview

On June 17, 2021, representatives from U.S. Environmental Protection Agency (EPA) Region III and EPA's contract inspector from PG Environmental, (hereinafter referred to as EPA Inspection Team) conducted a compliance evaluation inspection at the Central Hampshire PSD Frenchburg Wastewater Treatment Plant (hereinafter, WWTP or Facility) in Frenchburg, WV. Central Hampshire PSD is identified as the Permittee and owns and operates the WWTP.

Approximate Entry Time: 10:00 AM (EDT) **Approximate Exit Time:** 1:15 PM (EDT)

Unique Project Identifier (UPI): 3E21WN034A

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APPENDIX LIST

Appendix A: Photograph Log

Appendix B: Exhibit Log

- Exhibit 1 – EPA ICIS Data for Outlet 001 (April 1, 2018 through June 30, 2021)
- Exhibit 2 – EPA ECHO Detailed Facility Report
- Exhibit 3 – EPA ICIS Data for DMR Non-Receipt Violations (April 1, 2020 through June 30, 2021)
- Exhibit 4 – EPA ICIS Data for Outlet IU01 (April 1, 2018 through June 30, 2021)
- Exhibit 5 – EPA ICIS Data for Outlet IU02 (April 1, 2018 through June 30, 2021)
- Exhibit 6 – EPA ICIS Data for Outlet IU03 (April 1, 2018 through June 30, 2021)
- Exhibit 7 – EPA ICIS Data for Outlet IU04 (April 1, 2018 through June 30, 2021)
- Exhibit 8 – “Frenchburg Maintenance” Forms (January 2021 through June 2021)

Appendix C: NPDES Permit No. WV0081850

I. INTRODUCTION

On June 17, 2021, representatives from U.S. Environmental Protection Agency (EPA) Region III and EPA's contract inspector from PG Environmental, (hereinafter referred to as the EPA Inspection Team) inspected the Central Hampshire PSD Frenchburg Wastewater Treatment Plant (hereinafter, WWTP or Facility) in Frenchburg, WV. Central Hampshire PSD is identified as the Permittee and owns and operates the WWTP. The EPA Inspection Team was joined on the inspection by the Chief Operator. The primary purpose of the inspection was to review WWTP operations, to review the accuracy and reliability of the Permittee's self-monitoring and reporting program, and to obtain information that will assist EPA in assessing the Permittee's compliance with the requirements of the Permit. The weather at the time of the inspection was sunny and warm, with no precipitation.

The WWTP is an extended aeration treatment process with UV disinfection. Wasted sludge is placed into a sludge holding basin and hauled offsite by a septic hauler.

The WWTP has a permitted hydraulic capacity of 0.2 million gallons per day (MGD) and serves a population of approximately 2,000 people. The Permittee's activities are regulated under National Pollutant Discharge Elimination System (NPDES) Permit No. WV0081850 (hereinafter, Permit), which became effective on June 1, 2020 and is set to expire on April 27, 2025 (refer to Appendix C).

The Permittee is planning major upgrades to WWTP that will include the installation of new treatment facilities/replacement of existing treatment facilities (e.g., grit removal, biological reactors designed for nutrient removal, aerobic digesters, rotary sludge press). The Chief Operator stated that the Permittee's contract engineer is still in the design process and that funding for the upgrades has not been secured.

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at 10:00 AM (EDT) for the inspection. Stephen Clark of PG Environmental displayed his Clean Water Act inspector credential to the Chief Operator at the outset of the inspection and explained the purpose of the inspection was to observe compliance with the Permit. A copy of the Permit is provided in Appendix C. Table 1 describes the individuals that participated in the inspection.

Table 1. Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Inspection Team			
Stephen Clark, Inspector	PG Environmental	(720) 789-8046	stephen.clark@pgenv.com
Amanda Pruzinsky, Inspector	EPA Region III	(215) 814-5456	pruzinsky.amanda@epa.gov
WVDEP			
Chad Swick, Inspector	WVDEP	(304) 822-7266	chad.c.swick@wv.gov
Facility Representative			
Russell Riggs, Chief Operator	Central Hampshire PSD	(304) 671-8133	rtriggs5@yahoo.com

Facility Site Walk

As part of the process, the EPA Inspection Team visually observed the treatment train and site conditions in the presence of the Chief Operator. The wastewater process train consists of:

- Influent pump station
- Mechanical bar screen (with bypass channel for manual bar rack)
- Splitter box
- Two aeration basins with integral clarifiers
- Secondary clarifier (added during a WWTP upgrade in 2004)
- UV disinfection
- Post-aeration basin
- Sludge holding basin

All influent wastewater flows to the Facility's onsite influent pump station. The pump station has two pumps that convey wastewater to the headworks building (refer to [Appendix A, Photograph 1](#)). The two pumps are alternated in lead and lag positions. The wet well is equipped with an auto dialer (the only telemetry installed at the Facility) to alert Facility personnel of high wet well levels.

The Chief Operator stated that the Facility serves a regional jail and juvenile center and that wastewater from these locations contains general trash and debris. Wastewater from these locations is conveyed through a sewage grinder prior to flowing to the publicly owned treatment works (POTW).

The Facility headworks consists of a micro strainer. The influent channel to the micro strainer has a secondary channel that contains a manual bar rack in the event the mechanical bar screen is taken offline. Screenings are captured in a trash receptacles and disposed of at a landfill (refer to [Appendix A, Photographs 2 through 4](#)).

After the micro strainer, wastewater then flows to a splitter box that directs flows to each aeration basin (refer to [Appendix A, Photograph 5](#)). The Chief Operator stated that the splitter box doesn't evenly split flows (Aeration Basin No. 2 receives approximately 60% of influent flows and Aeration Basin No. 1 receives approximately 40%). Operators manually clean the splitter box once per week. Operators place the removed material (e.g., grit) inside the containers and allow residual wastewater to drain back to the splitter box before disposal (refer to [Appendix A, Photograph 6](#)). Operators must shut down the influent pump station for approximately 45 minutes to clean the splitter box. The Chief Operator stated that the shutdown is typically performed early in the morning hours when influent flows are relatively low.

After the splitter box, flow is sent to one of two aeration basins with integral clarifiers (refer to [Appendix A, Photographs 7 through 10](#)). Returned activated sludge (RAS) is sent to the aeration basin via an air-lift system; the wasted activated sludge (WAS) is obtained from the RAS feed and sent to the sludge holding basin. The RAS feed is chlorinated due to filamentous bacteria issues.

Clarified wastewater from the integral clarifiers then flows to a circular secondary clarifier (refer to [Appendix A, Photographs 11 through 13](#)). The Chief Operator stated that the circular clarifier was added during a plant upgrade in 2004 because the design of the integral clarifiers created various sludge issues (e.g., washouts, poorly settling sludge). Sludge that settles in the circular secondary clarifier is returned to the headworks; a sludge blanket is not maintained. The skimmed wastewater flows through a chopper pump then to the sludge holding basin.

Clarified wastewater from the circular secondary clarifier then flows to the UV disinfection system which

consists of two banks with 24 bulbs each (refer to [Appendix A, Photograph 14](#)). The area that houses the banks is hosed and brushed weekly, and the jackets are cleaned monthly with a descaling agent. The jackets and bulbs are replaced annually.

Wastewater then flows through a Parshall flume with an ultrasonic flow meter then to the post-aeration basin to increase the dissolved oxygen (DO) concentrations (refer to [Appendix A, Photographs 15 and 16](#)).

Wastewater is then discharged from the post-aeration basin to the Little Cacapon River via Outlet 001 (refer to [Appendix A, Photographs 17 through 20](#)).

Solids are removed from the sludge holding basin (refer to [Appendix A, Photograph 21](#)) approximately once per week for disposal. The facility does not have solids processing equipment (e.g., belt filter press). Solids are hauled off by a contract septage hauler for disposal.

Records Review

The EPA Inspection Team conducted a records review to evaluate the Permittee's compliance with the Permit. Most of the records and reports required by the Permit were available for review prior to and after the inspection. The following were reviewed:

- EPA Integrated Compliance Information System (ICIS) data during the period from April 1, 2018 through April 30, 2021 (the timeframe covered by ECHO's three-year compliance status plus April 2021)
- Compliance sampling records/logs
- Daily operator logbook
- Hard-copy forms used to document runtimes for various equipment (e.g., pumps, blowers, mixers, UV disinfection units)
- Generator maintenance logs
- Various maintenance logs for Facility equipment (e.g., rake motors, blowers, UV disinfection units)
- Flow meter calibration report for effluent, RAS, and WAS flow meters (calibration performed on May 26, 2021)
- Process control sampling logs
- Facility equipment O&M manuals
- Facility engineering drawings

Summary of Observations

The following section summarizes the EPA Inspection Team's observations relative to the Permittee's Permit requirements, including the status of certain treatment units, operation and maintenance practices, and the Permittee's monitoring and reporting documentation.

Permit Status and Effluent Exceedances

Section A.001 of the Permit defines discharge limitations and monitoring requirements for Outlet 001 discharges.

Observation 1. According to EPA's ICIS database, the Facility experienced 13 effluent limit exceedances from Outlet 001 between April 1, 2018 and June 30, 2021 (i.e., the timeframe covered by ECHO's three-year compliance history, plus April–June 2021; refer to [Appendix B, Exhibit 1](#) and Table 2 below). Four of the exceedances occurred

under the current version of the Permit (effective June 1, 2020). Note that the current Permit does not contain a discharge limitation for total recoverable copper from Outlet 001; the Permittee is required to report only.

Table 2. Summary of Effluent Exceedances at Outlet 001 (April 1, 2018 through May 31, 2021)

NPDES ID	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Type
WV0081850	5/31/2018	Ammonia Nitrogen	20.1	3.3	lbs./day	Avg. Monthly
WV0081850	5/31/2018	Ammonia Nitrogen	20.1	6.7	lbs./day	Max. Daily
WV0081850	5/31/2018	Ammonia Nitrogen	27.3	2	mg/L	Avg. Monthly
WV0081850	5/31/2018	Ammonia Nitrogen	27.3	4	mg/L	Max. Daily
WV0081850	3/31/2019	Fecal Coliform	807	200	#/100mL	Monthly Geometric Mean
WV0081850	3/31/2019	Fecal Coliform	2,419.6	400	#/100mL	Max. Daily
WV0081850	10/31/2019	Copper, Total Recoverable	12.8	0.02	mg/L	Avg. Monthly
WV0081850	10/31/2019	Copper, Total Recoverable	12.8	0.031	mg/L	Max. Daily
WV0081850	4/30/2020	Total Suspended Solids	84	85	Percent	Percent Removal
WV0081850	5/31/2021	Ammonia Nitrogen	27.4	3.3	lbs./day	Avg. Monthly
WV0081850	5/31/2021	Ammonia Nitrogen	27.4	6.7	lbs./day	Max. Daily
WV0081850	5/31/2021	Ammonia Nitrogen	33.6	2	mg/L	Avg. Monthly
WV0081850	5/31/2021	Ammonia Nitrogen	33.6	4	mg/L	Max. Daily

Section C.5 of the Permit states, “The permittee shall submit monthly according to the enclosed format, a Discharge Monitoring Report (DMR) indicating in terms of concentration and/or quantities the values of the constituents listed in Section A analytically determined to be in the plant effluent(s).”

Section C.6 of the Permit states, “The required DMRs shall be received no later than 25 days [emphasis added] following the end of the reporting period.”

Observation 2. EPA’s Enforcement and Compliance History Online (ECHO) has identified the Facility to be in significant noncompliance (SNC) for April 1, 2020 through March 31, 2021 for “Failure to Report DMR – Not Received” (refer to [Appendix B, Exhibit 2](#)). According to EPA’s ICIS database for this time period and Outlet 001, the Permittee has been reporting DMR data for Outlet 001 and the database does not identify DMR non-receipt violations. EPA’s ICIS database identifies DMR non-receipt violations for industrial users IU01, IU02, and IU03 for this time period (refer to [Appendix B, Exhibit 3](#)). The violations are identified for reporting DMRs with the No Data Indicator (NODI) Code “E,” “Failed to Sample/Required Analysis Not Conducted” and for reporting late DMRs.

Section A.IU01 of the Permit defines discharge limitations and monitoring requirements for Non-Significant Industrial User IU01 (Living Water Auto Spa) and states, “During the period beginning 6/1/2020 and lasting through midnight 4/27/2025 the permittee is authorized to accept the discharge from Outlet Number(s) IU01 (Pretreatment - Non Significant Industrial User)” and that “Such discharges shall be limited and monitored by the permittee as specified [in the table] below.”

Section E.4 of the Permit states, “Should any of the permittee's industrial users fail to comply with the specific terms and conditions pertaining to that specific industrial user in this permit, the permittee shall immediately contact said industrial user and identify the violation causing the noncompliance with the permit. The permittee shall take all reasonable, escalating enforcement steps, up to and including disallowing the continued acceptance of the nondomestic wastewater from the industrial user, to keep the industrial user compliant with the terms and conditions of the permit. Also, the permittee shall immediately inform the Agency of any current noncompliance by industrial users by attaching a written summary of these violations, the cause of each violation, and the steps taken to prevent their recurrence with the submitted Discharge Monitoring Reports.”

Observation 3. According to EPA’s ICIS database, the Facility experienced two effluent limit exceedances from Outlet IU01 between April 1, 2018 and June 30, 2021 (refer to [Appendix B, Exhibit 4](#) and Table 3 below). These exceedances did not occur under the current version of the Permit. Additionally, for the monitoring periods ending on April 30, 2021 and May 31, 2021, the Permittee reported the NODI Code “E,” “Failed to Sample/Required Analysis Not Conducted” (refer to [Appendix B, Exhibit 3](#)).

Note that the previous version of the Permit identifies Non-Significant Industrial User IU01 as “Washco Services Inc., Car Wash.”

Table 3. Summary of Effluent Exceedances at Outlet IU01 (April 1, 2018 through April 30, 2021)

NPDES ID	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Type
WV0081850	2/28/2019	Total Suspended Solids	1,200	300	mg/L	Max. Daily
WV0081850	5/31/2019	Oil and Grease	32	30	mg/L	Max. Daily

Section A.IU02 of the Permit defines discharge limitations and monitoring requirements for Non-Significant Industrial User IU02 (Potomac Edison First Energy) and states, “During the period beginning 6/1/2020 and lasting through midnight 4/27/2025 the permittee is authorized to accept the discharge from Outlet Number(s) IU02 (Pretreatment - Non Significant Industrial User)” and that “Such discharges shall be limited and monitored by the permittee as specified [in the table] below.”

Observation 4. According to EPA’s ICIS database, the Facility experienced one effluent limit exceedance from Outlet IU02 between April 1, 2018 and June 30, 2021 (refer to [Appendix B, Exhibit 5](#) and Table 4 below). The exceedance did not occur under the current version of the Permit.

Table 4. Summary of Effluent Exceedances at Outlet IU02 (April 1, 2018 through May 31, 2021)

NPDES ID	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Type
WV0081850	3/31/2019	Lead, Total	0.098	0.05	mg/L	Max. Daily

Section A.IU03 of the Permit defines discharge limitations and monitoring requirements for Non-Significant Industrial User IU03 (West Virginia Department of Highways Augusta Station) and states, “During the period beginning 6/1/2020 and lasting through midnight 4/27/2025 the permittee is authorized to accept the discharge from Outlet Number(s) IU03 (Pretreatment - Non Significant Industrial User)” and that “Such discharges shall be limited and monitored by the permittee as specified [in the table] below.”

Observation 5. According to EPA’s ICIS database, the Facility experienced five effluent limit exceedances from Outlet IU03 between April 1, 2018 and June 30, 2021 (refer to [Appendix B, Exhibit 6](#) and Table 5 below). One exceedance occurred under the current version of the Permit. Additionally, for the monitoring period ending on April 30, 2020, the Permittee reported the NODI Code “E,” “Failed to Sample/Required Analysis Not Conducted” (refer to [Appendix B, Exhibit 3](#)).

Table 5. Summary of Effluent Exceedances at Outlet IU03 (April 1, 2018 through April 30, 2021)

NPDES ID	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Type
WV0081850	9/30/2018	Zinc, Total	0.74	0.5	mg/L	Max. Daily
WV0081850	12/31/2018	Zinc, Total	0.74	0.5	mg/L	Max. Daily
WV0081850	2/28/2019	Total Suspended Solids	404	300	mg/L	Max. Daily
WV0081850	2/28/2019	Zinc, Total	0.74	0.5	mg/L	Max. Daily
WV0081850	5/31/2021	Total Suspended Solids	352	300	mg/L	Max. Daily

Section A.IU04 of the Permit defines discharge limitations and monitoring requirements for Non-Significant Industrial User IU04 (Hampshire County High School) and states, “During the period beginning 6/1/2020 and lasting through midnight 4/27/2025 the permittee is authorized to accept the discharge from Outlet Number(s) IU04 (Pretreatment - Non Significant Industrial User)” and that “Such discharges shall be limited and monitored by the permittee as specified [in the table] below.”

Observation 6. According to EPA’s ICIS database, the Facility experienced 25 effluent limit exceedances from Outlet IU04 between April 1, 2018 and June 30, 2021 (refer to [Appendix B, Exhibit 7](#) and Table 6 below). None of these exceedances occurred under the current version of the Permit. Note that the current version of the Permit does not contain a discharge limitation for Total Kjeldahl Nitrogen from Outlet IU04; the Permittee is required to report only.

Table 6. Summary of Effluent Exceedances at Outlet IU04 (April 1, 2018 through April 30, 2021)

NPDES ID	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Type
WV0081850	04/30/2018	Nitrogen, Kjeldahl Total	305	100	mg/L	Max. Daily
WV0081850	05/31/2018	Nitrogen, Kjeldahl Total	328	100	mg/L	Max. Daily
WV0081850	06/30/2018	Nitrogen, Kjeldahl Total	176	100	mg/L	Max. Daily
WV0081850	7/31/2018	Nitrogen, Kjeldahl Total	161	100	mg/L	Max. Daily
WV0081850	8/31/2018	Nitrogen, Kjeldahl Total	174	100	mg/L	Max. Daily
WV0081850	09/30/2018	Nitrogen, Kjeldahl Total	256	100	mg/L	Max. Daily
WV0081850	10/31/2018	Nitrogen, Kjeldahl Total	120	100	mg/L	Max. Daily
WV0081850	11/30/2018	Nitrogen, Kjeldahl Total	102	100	mg/L	Max. Daily
WV0081850	12/31/2018	Nitrogen, Kjeldahl Total	148	100	mg/L	Max. Daily
WV0081850	02/28/2019	Nitrogen, Kjeldahl Total	220	100	mg/L	Max. Daily
WV0081850	03/31/2019	Nitrogen, Kjeldahl Total	256	100	mg/L	Max. Daily
WV0081850	04/30/2019	Nitrogen, Kjeldahl Total	274	100	mg/L	Max. Daily
WV0081850	05/31/2019	Nitrogen, Kjeldahl Total	351	100	mg/L	Max. Daily
WV0081850	07/31/2019	Nitrogen, Kjeldahl Total	343	100	mg/L	Max. Daily
WV0081850	08/31/2019	Nitrogen, Kjeldahl Total	237	100	mg/L	Max. Daily
WV0081850	09/30/2019	Nitrogen, Kjeldahl Total	268	100	mg/L	Max. Daily
WV0081850	10/31/2019	Nitrogen, Kjeldahl Total	215	100	mg/L	Max. Daily
WV0081850	11/30/2019	Nitrogen, Kjeldahl Total	231	100	mg/L	Max. Daily
WV0081850	12/31/2019	Nitrogen, Kjeldahl Total	282	100	mg/L	Max. Daily
WV0081850	01/31/2020	Nitrogen, Kjeldahl Total	389	100	mg/L	Max. Daily
WV0081850	02/29/2020	Nitrogen, Kjeldahl Total	544	100	mg/L	Max. Daily
WV0081850	03/31/2020	Nitrogen, Kjeldahl Total	564	100	mg/L	Max. Daily
WV0081850	04/30/2020	Nitrogen, Kjeldahl Total	611	100	mg/L	Max. Daily
WV0081850	05/31/2020	pH	3.96	5	s.u.	Inst. Min.
WV0081850	05/31/2020	Nitrogen, Kjeldahl Total	673	100	mg/L	Max. Daily

Monitoring Requirements

Section A.001 of the Permit states, “Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Effluent BOD5 samples shall be collected at a location immediately preceding disinfection. All other effluent samples shall be collected at, or as near as possible to, the point of discharge.”

Observation 7. According to the Chief Operator, effluent biochemical oxygen demand (BOD) samples are collected at Outlet 001 after disinfection and that he does not ask the laboratory to seed the sample during analysis.

Observation 8. The Facility’s effluent flow meter and Parshall flume are located upstream of the post-aeration basin.

Appendix A, Section III.3 of the Permit states, “Samples shall be taken, preserved and analyzed in accordance with the latest edition of 40 CFR Part 136, unless other test procedures have been specified elsewhere in this permit.” Table II in 40 CFR 136 requires BOD and TSS samples to be preserved by cooling to $\leq 6^{\circ}\text{C}$.

Observation 9. The Chief Operator stated that he collects influent composite samples by placing grab samples taken each hour in a common bucket. The bucket was not being placed on ice or refrigerated during the 8-hour composite period. The influent composite sample is later placed on ice after it is transferred to the bottle that is provided to the laboratory. Note that the Chief Operator stated that effluent composite samples are collected in a similar manner but refrigerated starting at the beginning of the collection period.

Proper Operation and Maintenance

Appendix A, Part II.1 of the Permit states, “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures. Unless otherwise required by Federal or State law, this provision requires the operation of back-up auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of the permit.”

Observation 10. The EPA Inspection Team made multiple observations related to operations and maintenance at the Facility:

- One of the diffusers in Aeration Basin No. 2 did not appear to be evenly distributing air to the aeration basin. The Chief Operator stated that debris accumulates on the diffusers and that the diffusers are pulled from the aeration basins and cleaned annually.
- Green-colored vegetative material which appeared to be duckweed was present on the surface of the aeration basins (refer to [Appendix A, Photographs 7 and 9](#)). The Chief Operator stated did not know the source of the potential duckweed.
- Sludge and what appeared to be duckweed were present on the surface of the integral clarifiers (refer to [Appendix A, Photographs 8 and 10](#)). The clarifiers have a baffle that surrounds the effluent weir.

- Biological growth was present on the weirs for the integral clarifiers (refer to Appendix A, Photographs 8 and 10). The Chief Operator stated that the weir is scrubbed weekly; the EPA Inspection Team observed that this activity was not documented on the “Frenchburg Maintenance” form (refer to Appendix B, Exhibit 8). It was unclear if this activity was documented in another format.
- Biological growth was present on the weir for the circular secondary clarifier (refer to Appendix A, Photographs 11 through 13). The Chief Operator stated that the weir is scrubbed weekly; the EPA Inspection Team observed that this activity was routinely documented on the “Frenchburg Maintenance” form (refer to Appendix B, Exhibit 8).

Closing Conference

After the Facility site walk, the EPA Inspection Team met with the Chief Operator for a closing conference and shared its preliminary observations. The EPA Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after the additional review of materials following the inspection.

The inspection concluded at approximately 1:15 PM (EDT).