



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

for

Name of Facility: Summersville Lake—Long Point WWTP
Facility Address: 502 8th St, Huntington, WV 25701
Mailing Address: 502 8th St., Huntington, WV 25701

Report Prepared on: 7/28/2023
Date

By: Mike Beck , ERG
Signature

Report Final as of: 8/11/2023
Date

By: JESSICA DUFFY , EPA
Signature
Digitally signed by
JESSICA DUFFY
Date: 2023.08.11
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General Information

Type of Inspection:	Wastewater Treatment Facility CEI
Owner:	US Army Corps of Engineers
Operator:	Shawn Griffith
Permittee:	US Army Corps of Engineers
NPDES Permit No:	WV0103110/ WVG550078
NPDES Permit Effective Date:	October 1, 2020
NPDES Permit Expiration Date:	September 30, 2025
Receiving Water and/or MS4:	Summersville Lake
Latitude and Longitude:	38.24046, -80.87977

On-Site Facility Inspection Overview

On June 13, 2023, U.S. Environmental Protection Agency (EPA) Region III's contract inspectors from Eastern Research Group, Inc., (hereinafter referred to as Inspectors) inspected the Summersville Lake—Long Point Treatment Plant (hereinafter, WWTP or Plant) in Summersville, West Virginia. The U.S. Army Corps of Engineers is identified as the Permittee and owns and operates the WWTP. The Inspectors were accompanied on the inspection by state representatives from the West Virginia Department of Environmental Protection (WVDEP).

Approximate Entry Time: 9:00 AM (EDT) **Approximate Exit Time:** 12:30 PM (EDT)

Unique Project Identifier (UPI): 3E23WN094A

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Appendix A: Photograph Log

Appendix B: Exhibit Log

- Exhibit 1 – EPA ECHO eDMR Data (June 2018 through June 2023)
- Exhibit 2 – EPA ECHO Detailed Facility Report
- Exhibit 3 – Summersville Lake—Long Point NOV from WVDEP

Appendix C: NPDES Permit No. WV0103110

I. INTRODUCTION

On June 13, 2023, U.S. Environmental Protection Agency (EPA) Region III's contract inspectors from Eastern Research Group, Inc., (hereinafter referred to as inspectors) inspected the Summersville Lake—Long Point Treatment Plant (hereinafter, WWTP or plant) in Summersville, West Virginia. The U.S. Army Corps of Engineers (USACE) is identified as the permittee and owns and operates the WWTP. The inspectors were joined on the inspection by the USACE Summersville Lake Maintenance Supervisor, USACE Facility Operations Specialist, USACE Environmental Compliance Coordinator, and two USACE Huntington District Engineers. The permittee's activities are regulated under National Pollutant Discharge Elimination System (NPDES) Permit No. WV0103110/WVG550078 (hereinafter, permit), which became effective on October 1, 2020, and expires on September 30, 2025 (refer to Appendix C).

The primary purpose of the inspection was to review the onsite plant operations 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 partly sunny, with a high temperature of about 63 degrees Fahrenheit. According to National Oceanic and Atmospheric Administration (NOAA) climate data¹, the Summersville area experienced approximately 0.76 inches of precipitation between June 12 and 13, 2023.

The WWTP uses a single primary settling tank followed by an Orenco AdvanTex® recirculating media filter then a UV contact chamber. Wastewater is collected at the boat pump-out station and the restroom facility at the marina referred to by plant staff as the comfort station. Wastewater from the boat pump-out is pumped from a lift station near the edge of the lake to the manhole located east of the comfort station. Wastewater from the comfort station is gravity fed to the manhole at which point both waste streams combine and are gravity fed to the plant.

Due to the seasonality of plant use, start-up is required at the beginning of each season, usually occurring a few weeks before Memorial Day, the start-up procedure consists of pumping down the primary tank, refilling partially with water and running the recirculating media filter constantly for two days. Shut down occurs in late October where all lines after the septic tank are drained including the media filter and UV system to prevent damage caused by freezing.

The primary operator and four additional operators on the maintenance team are all licensed wastewater operators with West Virginia. This team conducts necessary daily maintenance and operations of several USACE owned facilities in the area. Pace Analytical is contracted to do the full suite of permit sampling analyses for reporting. Plant staff do not conduct any in-house sampling or analyses. The plant is operational between May and October of each year and experiences weekly fluctuations in flow with weekend flows being the highest. The plant has a design capacity of 5,000 gallons per day (GPD).

II. INSPECTION PROCESS

Inspection Opening Conference

The inspectors arrived at the USACE office along Summersville Lake Rd at 9:00 AM (EDT) for the inspection. Mike Beck of Eastern Research Group presented his Clean Water Act inspector credential to the plant supervisor 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 presents the individuals that participated in the inspection.

¹ <https://www.ncei.noaa.gov/cdo-web/search>

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Contract Inspector			
Mike Beck, Inspector	Eastern Research Group	(703) 633-1614	mike.beck@erg.com
Annie Dubner, Support Inspector	Eastern Research Group	(612) 270-4180	annie.dubner@erg.com
State Representatives			
Gregory Morris, Environmental Inspector Supervisor	West Virginia Department of Environmental Protection	(304) 389-7671	gregory.c.morris@wv.gov
Takayla Nary, Environmental Inspector in Training	West Virginia Department of Environmental Protection	(681) 319-1540	takayla.a.nary@wv.gov
Site/Facility Representatives			
Shawn Griffith, Plant Supervisor	USACE, Summersville Lake	(304) 880-0880	shawn.c.griffith@usace.army.mil
Joseph Bailes	USACE, Facility Operations Specialist	(304) 872-4037	joseph.w.bailes@usace.army.mil
Joseph McCallister	USACE, Huntington District	(304) 399-5969	joseph.m.mccallister@usace.army.mil
Andrew Auxier	USACE, Huntington District	(606) 939-1050	andrew.j.auxier@usace.army.mil
Hunter Simmons	USACE, ECC Ranger	(304) 923-7654	hunter.s.simmons@usace.army.mil

Facility Site Walk

As part of the inspection process, the inspectors visually observed the lift station, treatment train, site conditions, and outfall location in the presence of the plant supervisor and the plant operator (refer to [Appendix A, Photographs 1 through 15](#)). The wastewater treatment train consists of:

- Primary settling tank
- Orenco AdvanTex® system
- UV contact chamber

Wastewater is pumped to the confluence manhole east of the comfort station via one lift station near the boat pump-out dock and gravity fed to the WWTP. The lift station is located at the edge of the lake and does not have a watertight lid (refer to [Appendix A, Photograph 2](#)). The plant operator stated that the lake level has not risen to the level of the lift station before (refer to [Appendix A, Photograph 3](#)).

The primary settling tank has two openings with one opening on either side an internal baffle (refer to [Appendix A, Photograph 5](#)). Plant staff said the tank was 10,000 gallons. The inspectors observed floating debris on the influent side of the primary settling tank (refer to [Appendix A, Photograph 6](#)). Secondary treatment effluent is recycled back into the primary settling tank via a pipe outlet near the primary tank effluent side (refer to [Appendix A, Photograph 7](#)). The plant supervisor stated that they intend to move the recycled flow inlet from the effluent side to the opening near the influent side of the tank.

The plant has an Orenco AdvanTex® recirculating media filter (refer to [Appendix A, Photograph 8](#)). Spinners spray recirculated flow across the fixed film and a fan moves air through the system (refer to [Appendix A, Photograph 9](#)). The plant supervisor stated there are no adjustment capabilities for the recirculation rate and the control panel for the Orenco system is very simple and does not allow plant operators to adjust based on variations in usage (refer to [Appendix A, Photograph 10](#)). Current USACE security restrictions do not allow remote access to assets and restrict the use of external devices for

control. The WWTP does not have an alarm system in place to indicate failure of components; all operational status checks are done visually.

The UV contact chamber is housed within a small plastic shed (refer to [Appendix A, Photograph 11](#)). The plant operator stated that they replace the UV bulb every year, but replacement is done as needed and not on a set timeline. The plant operator noted that they have had problems with the UV indicator on the unit not working properly. The indicator sensor was removed at the time of the visit (refer to [Appendix A, Photograph 11](#)). The sample tap is located just outside of the UV system shed (refer to [Appendix A, Photograph 12](#)). Flow continues from that point to the outfall located in the lake approximately 17 feet underwater (refer to [Appendix A, Photograph 13](#)). The sign for the outfall is located on the plant perimeter fencing (refer to [Appendix A, Photograph 14](#)). The operator said the outfall signage was previously located closer to the outfall itself, but the sign was consistently being tampered with, needing replacement.

The plant does not have back up power or a way to connect a backup generator. The plant supervisor stated that in the event of a power failure, they close the boat pump-out and comfort station entirely until power is restored.

Records Review

The inspectors 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. Plant equipment operation and maintenance (O&M) manuals were reviewed onsite. The plant's electronic discharge monitoring reports (eDMRs) were obtained electronically and reviewed offsite after the onsite inspection. The following additional documents were reviewed:

- eDMR data during the period from April 1, 2018, through June 30, 2023
- WVDEP enforcement documents (August 2021)

Summary of Observations

The following section summarizes the inspectors' observations relative to the permit requirements.

Permit Status and Effluent Exceedances

Part A.1-A.3A of the permit defines effluent limitations and monitoring requirements for Outfall 001 discharges.

As part of the data review, the inspectors reviewed the Effluent Exceedances Report in EPA's Enforcement and Compliance History Online (ECHO) Database to compare reported values against effluent limitations defined in the permit (refer to [Appendix B, Exhibit 1](#)) in order to evaluate compliance.

Observation 1. According to EPA's ECHO database, the plant experienced 90 effluent limit exceedances from Outfall 001 between June 1, 2018, and June 30, 2023 (refer to [Appendix B, Exhibit 1](#) and Table 2 below). There were 42 exceedances for ammonia as nitrogen, 18 exceedances for BOD5, 14 exceedances for fecal coliform, 10 exceedances for pH, and 6 exceedances for dissolved oxygen (DO).

EPA's ECHO database indicates the plant was in a state of significant noncompliance (SNC) from July 1, 2020, through December 31, 2020, and July 1, 2022 through September 30, 2022 (refer to [Appendix B, Exhibit 2](#)).

Table 2. Outfall 001 Final Effluent Exceedances (June 1, 2018, through June 30, 2023)

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WVG550078	6/30/2018	pH	5.93	6	SU	Instantaneous Minimum
WVG550078	6/30/2018	Ammonia (as N)	41.4	7.5	mg/L	Instantaneous Maximum
WVG550078	6/30/2018	Ammonia (as N)	41.4	3	mg/L	Monthly Average
WVG550078	6/30/2018	Ammonia (as N)	41.4	6	mg/L	Daily Maximum
WVG550078	9/30/2018	BOD5	16	5	mg/L	Monthly Average
WVG550078	9/30/2018	BOD5	16	10	mg/L	Daily Maximum
WVG550078	9/30/2018	BOD5	16	12.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2018	pH	5.5	6	SU	Instantaneous Minimum
WVG550078	9/30/2018	Ammonia (as N)	96.8	7.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2018	Ammonia (as N)	96.8	3	mg/L	Monthly Average
WVG550078	9/30/2018	Ammonia (as N)	96.8	6	mg/L	Daily Maximum
WVG550078	9/30/2018	Fecal Coliform	350	200	#/100mL	Monthly Geometric Mean
WVG550078	12/31/2018	pH	5.1	6	SU	Instantaneous Minimum
WVG550078	12/31/2018	Ammonia (as N)	60.1	6	mg/L	Monthly Average
WVG550078	12/31/2018	Ammonia (as N)	60.1	12	mg/L	Daily Maximum
WVG550078	12/31/2018	Ammonia (as N)	60.1	15	mg/L	Instantaneous Maximum
WVG550078	6/30/2019	Dissolved Oxygen (DO)	5.5	6	mg/L	Instantaneous Minimum
WVG550078	6/30/2019	Ammonia (as N)	9.94	6	mg/L	Daily Maximum
WVG550078	6/30/2019	Ammonia (as N)	9.94	7.5	mg/L	Instantaneous Maximum
WVG550078	6/30/2019	Ammonia (as N)	9.94	3	mg/L	Monthly Average
WVG550078	9/30/2019	Dissolved Oxygen (DO)	5.37	6	mg/L	Instantaneous Minimum
WVG550078	9/30/2019	pH	2.54	6	SU	Instantaneous Minimum
WVG550078	9/30/2019	Ammonia (as N)	34.6	6	mg/L	Daily Maximum
WVG550078	9/30/2019	Ammonia (as N)	34.6	3	mg/L	Monthly Average
WVG550078	9/30/2019	Ammonia (as N)	34.6	7.5	mg/L	Instantaneous Maximum
WVG550078	12/31/2019	Dissolved Oxygen (DO)	3.58	6	mg/L	Instantaneous Minimum
WVG550078	12/31/2019	pH	2.26	6	SU	Instantaneous Minimum
WVG550078	12/31/2019	Ammonia (as N)	43.8	15	mg/L	Instantaneous Maximum
WVG550078	12/31/2019	Ammonia (as N)	43.8	12	mg/L	Daily Maximum
WVG550078	12/31/2019	Ammonia (as N)	43.8	6	mg/L	Monthly Average
WVG550078	6/30/2020	Dissolved Oxygen (DO)	4.27	6	mg/L	Instantaneous Minimum
WVG550078	6/30/2020	BOD5	10.2	10	mg/L	Daily Maximum
WVG550078	6/30/2020	BOD5	7.7	5	mg/L	Monthly Average
WVG550078	6/30/2020	Ammonia (as N)	101	7.5	mg/L	Instantaneous Maximum
WVG550078	6/30/2020	Ammonia (as N)	101	6	mg/L	Daily Maximum
WVG550078	6/30/2020	Ammonia (as N)	82	3	mg/L	Monthly Average
WVG550078	6/30/2020	Fecal Coliform	1600	200	#/100mL	Monthly Geometric Mean
WVG550078	6/30/2020	Fecal Coliform	1600	500	#/100mL	Instantaneous Maximum
WVG550078	6/30/2020	Fecal Coliform	1600	400	#/100mL	Daily Maximum
WVG550078	9/30/2020	Dissolved Oxygen (DO)	3.89	6	mg/L	Instantaneous Minimum
WVG550078	9/30/2020	BOD5	20.3	12.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2020	BOD5	20.3	10	mg/L	Daily Maximum
WVG550078	9/30/2020	BOD5	6.2	5	mg/L	Monthly Average
WVG550078	9/30/2020	pH	2.91	6	SU	Instantaneous Minimum
WVG550078	9/30/2020	Ammonia (as N)	135	7.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2020	Ammonia (as N)	135	6	mg/L	Daily Maximum
WVG550078	9/30/2020	Ammonia (as N)	111.2	3	mg/L	Monthly Average
WVG550078	9/30/2020	Fecal Coliform	1600	400	#/100mL	Daily Maximum
WVG550078	9/30/2020	Fecal Coliform	1600	500	#/100mL	Instantaneous Maximum
WVG550078	12/31/2020	pH	2.53	6	SU	Instantaneous Minimum
WVG550078	12/31/2020	Ammonia (as N)	46.7	6	mg/L	Monthly Average

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WVG550078	12/31/2020	Ammonia (as N)	46.7	12	mg/L	Daily Maximum
WVG550078	12/31/2020	Ammonia (as N)	46.7	15	mg/L	Instantaneous Maximum
WVG550078	6/30/2021	Dissolved Oxygen (DO)	4.67	6	mg/L	Instantaneous Minimum
WVG550078	6/30/2021	BOD5	31	5	mg/L	Monthly Average
WVG550078	6/30/2021	BOD5	31	10	mg/L	Daily Maximum
WVG550078	6/30/2021	BOD5	31	12.5	mg/L	Instantaneous Maximum
WVG550078	6/30/2021	pH	5.66	6	SU	Instantaneous Minimum
WVG550078	6/30/2021	Ammonia (as N)	70.8	3	mg/L	Monthly Average
WVG550078	6/30/2021	Ammonia (as N)	70.8	6	mg/L	Daily Maximum
WVG550078	6/30/2021	Ammonia (as N)	70.8	7.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2021	BOD5	6.83	5	mg/L	Monthly Average
WVG550078	9/30/2021	BOD5	10.1	10	mg/L	Daily Maximum
WVG550078	9/30/2021	pH	4.91	6	SU	Instantaneous Minimum
WVG550078	9/30/2021	Ammonia (as N)	102	6	mg/L	Daily Maximum
WVG550078	9/30/2021	Ammonia (as N)	102	7.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2021	Ammonia (as N)	83	3	mg/L	Monthly Average
WVG550078	9/30/2021	Fecal Coliform	1600	500	#/100mL	Instantaneous Maximum
WVG550078	9/30/2021	Fecal Coliform	1600	400	#/100mL	Daily Maximum
WVG550078	9/30/2021	Fecal Coliform	618	200	#/100mL	Monthly Geometric Mean
WVG550078	12/31/2021	pH	3.41	6	SU	Instantaneous Minimum
WVG550078	12/31/2021	Ammonia (as N)	74.4	15	mg/L	Instantaneous Maximum
WVG550078	12/31/2021	Ammonia (as N)	74.4	12	mg/L	Daily Maximum
WVG550078	12/31/2021	Ammonia (as N)	74.4	6	mg/L	Monthly Average
WVG550078	6/30/2022	BOD5	16.8	12.5	mg/L	Instantaneous Maximum
WVG550078	6/30/2022	BOD5	16.8	10	mg/L	Daily Maximum
WVG550078	6/30/2022	Ammonia (as N)	38.9	3	mg/L	Monthly Average
WVG550078	6/30/2022	Ammonia (as N)	69.6	6	mg/L	Daily Maximum
WVG550078	6/30/2022	Ammonia (as N)	69.6	7.5	mg/L	Instantaneous Maximum
WVG550078	6/30/2022	Fecal Coliform	424	200	#/100mL	Monthly Geometric Mean
WVG550078	6/30/2022	Fecal Coliform	6000	500	#/100mL	Instantaneous Maximum
WVG550078	6/30/2022	Fecal Coliform	6000	400	#/100mL	Daily Maximum
WVG550078	9/30/2022	BOD5	13.5	10	mg/L	Daily Maximum
WVG550078	9/30/2022	BOD5	9.1	5	mg/L	Monthly Average
WVG550078	9/30/2022	BOD5	13.5	12.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2022	Ammonia (as N)	84.6	7.5	mg/L	Instantaneous Maximum
WVG550078	9/30/2022	Ammonia (as N)	84.6	6	mg/L	Daily Maximum
WVG550078	9/30/2022	Ammonia (as N)	57.3	3	mg/L	Monthly Average
WVG550078	9/30/2022	Fecal Coliform	2200	500	#/100mL	Instantaneous Maximum
WVG550078	9/30/2022	Fecal Coliform	2200	400	#/100mL	Daily Maximum

Proper Operation and Maintenance (O&M)

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 the permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures, and also a log of all maintenance performed on the system (aerators, blowers, timers, etc). Unless otherwise required by Federal or State law, this provision requires the operation of back-up auxiliary facilities or similar systems that are installed by the permittee only when their operation is necessary to achieve compliance with the conditions of the permit. For domestic waste treatment facilities, waste treatment operators (Class S) as classified by the WV Bureau for Public Health Regulations authorized

under Chapter 16, Article 1, Public Health Laws, Code of West Virginia, will be required. Systems unable to achieve permit limits may be required to upgrade.”

- Observation 2.** According to the facility representatives, the plant has no ability to adjust the recirculation rate to accommodate the variations in flow experienced.
- Observation 3.** The plant had no standard operating procedure related to the frequency of pump-out on the primary tank.
- Observation 4.** The plant had no standard operating procedure related to the seasonal system start-up. Plant staff noted that the plant often struggles to effectively treat the wastewater during the start-up period.
- Observation 5.** The lift station is near the lake edge and does not have a watertight lid (refer to Appendix A, Photograph 3).
- Observation 6.** Plant representatives were unable to provide a log of all maintenance performed on the system as they did not keep a log of such activities.
- Observation 7.** The UV contact chamber did not have an alert system to indicate failure and cannot be visually inspected without opening the housing (refer to Appendix A, Photograph 11).
- Observation 8.** The plant did not have confined space signage on either of the entries to the primary tank or the lift station.
- Observation 9.** The plant did not have any kind of asset inventory.
- Observation 10.** The plant did not have a backup power source at the time of the inspection nor any way to connect a backup generator to the system.

Proper Plant Security

Part B.5 of the permit states, “The entire sewage treatment facility shall be adequately protected by fencing as per West Virginia Division of Health and Human Resources Legislative Rule 64 CSR 47.”

- Observation 11.** The Inspectors observed a gap along the bottom of the WWTP’s south fence line (refer to Appendix A, Photograph 15).

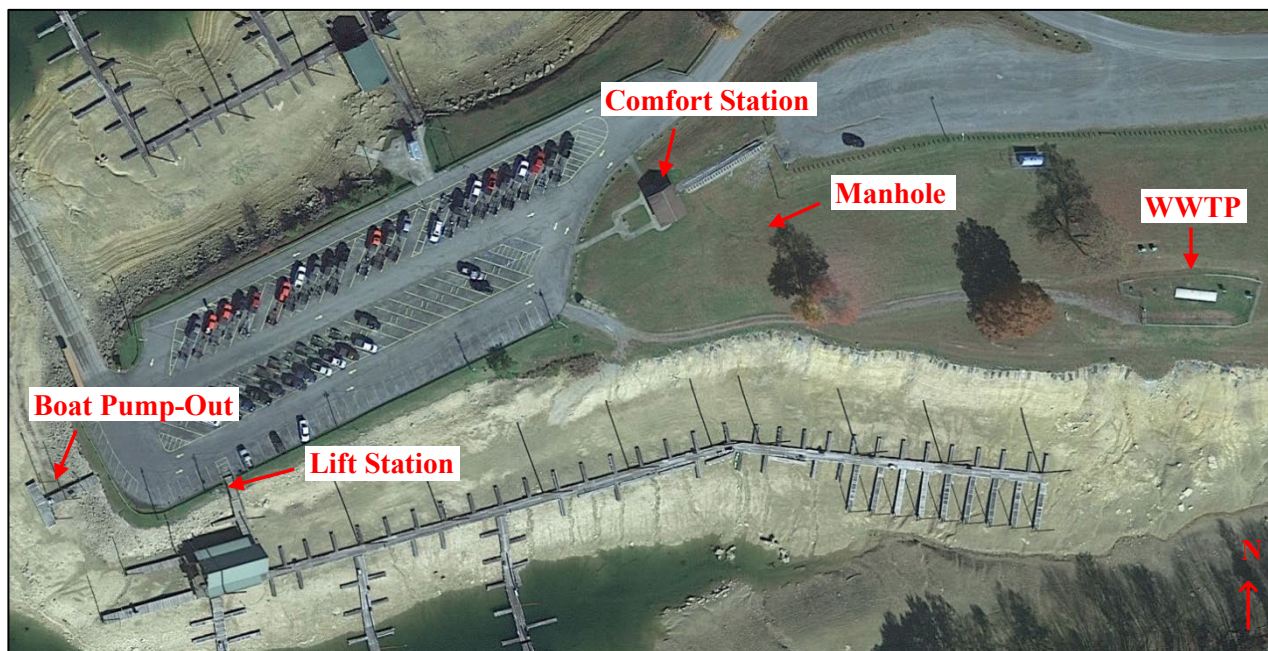
Closing Conference

After the plant site walk, the inspectors met with the plant supervisor, plant operator and WVDEP representatives for a closing conference and shared their preliminary observations including past exceedances observed in ECHO. The inspectors reiterated to the plant supervisor that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the inspectors and EPA 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 12:30 PM (EDT).

Appendix A

Photograph Log



Photograph 1. Site map of Summersville Lake—Long Point WWTP with major assets indicated.



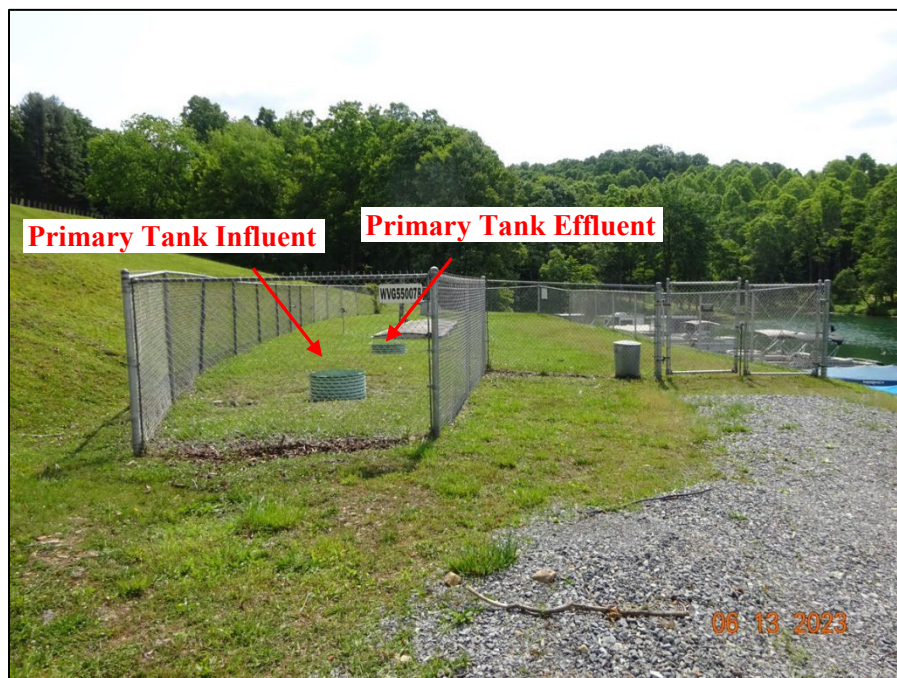
Photograph 2. View, facing west, of the lift station which pumps wastewater from the boat pump-out to the manhole behind the comfort station.



Photograph 3. View, facing southeast, of the lift station. Note proximity to waterline.



Photograph 4. View, facing east, of confluence manhole where wastewater from the boat pump-out and comfort station meet.



Photograph 5. View, facing east, of plant and the two primary tank openings.



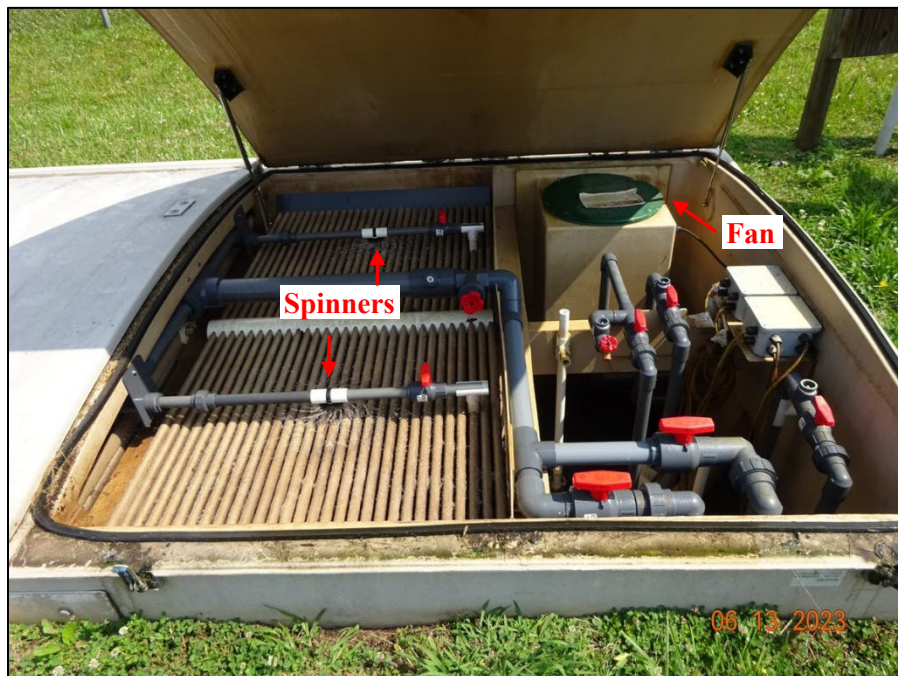
Photograph 6. View into the first opening of the primary tank. Note some trash and floating debris.



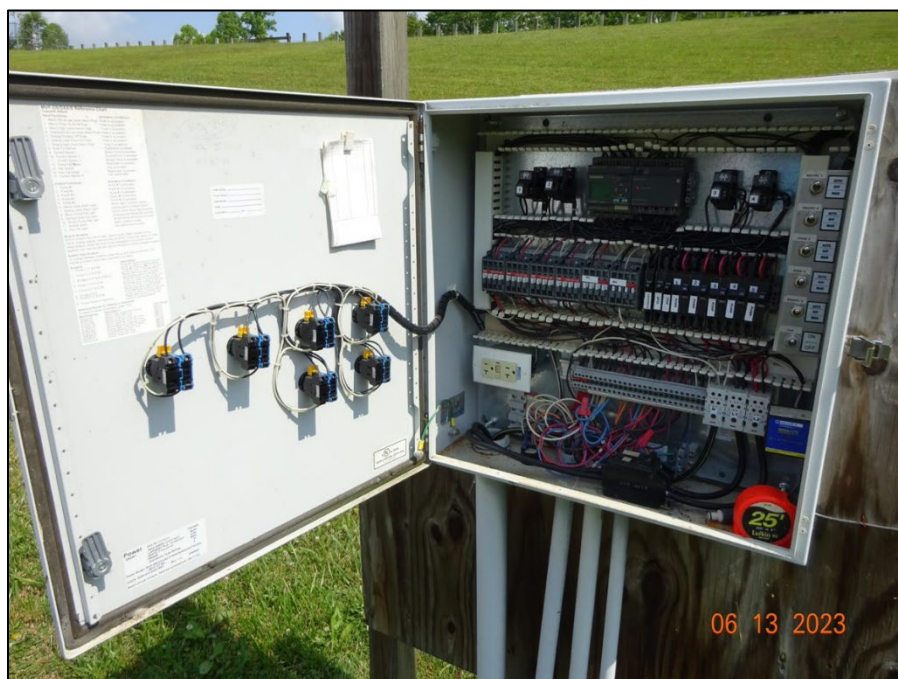
Photograph 7. View into the second opening of the primary tank. Note the white plastic recycle flow pipe at the edge of the opening.



Photograph 8. View, facing west, of the Orenco AdvanTex® recirculating media filter.



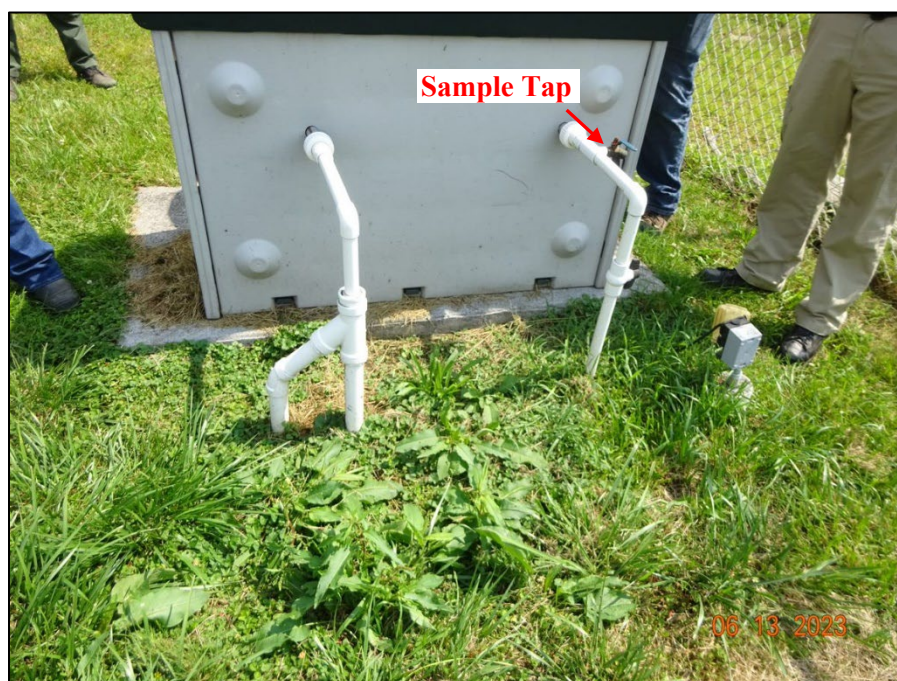
Photograph 9. View, facing north, of the last panel of the Orenco AdvanTex® recirculating media filter with replaceable spinners.



Photograph 10. View inside the control panel of the Orenco AdvanTex® recirculating media filter.



Photograph 11. View of the UV contact chamber inside its housing. Note debris and removed indicator unit on the floor of the housing.



Photograph 12. View, facing north, of the back of the housing where the UV contact chamber is located. The white pipe on the right of the housing goes to the outfall. Note the sample tap.



Photograph 13. View, facing south, of approximately where Outfall 001 is located. Note the outfall could not be visually inspected due to depth of lake at the time of inspection.



Photograph 14. View of outfall signage on outside of plant gate.



Photograph 15. View, facing south, of gap in plant perimeter fencing.