



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**Four Penn Center**  
**1600 JFK Blvd.**  
**Philadelphia, Pennsylvania 19103-2029**

**Report Title:** Clean Water Act Compliance Inspection Report  
**Inspection Date(s):** 05/15/2024  
**Regulatory Program(s):** National Pollutant Discharge Elimination System ("NPDES")  
**Type of Activity:** Domestic Wastewater (Non-Municipal)  
**Site/Facility Name:** WV Department of Agriculture (Guthrie Center)  
**Permittee(s):** WV Department of Agriculture (Guthrie Center)  
**Site/Facility Operator:** WV Department of Agriculture (Guthrie Center)  
**Site/Facility Address:** 419 Gus R Douglass Lane  
Charleston, WV  
**Latitude/Longitude:** 38.44265, -81.68186  
**County/Parish:** Kanawha County  
**General Permit No.:** WV0103110  
**Site Permit No.:** WVG550262  
**NAICS Code:** 531120 **SIC:** 6512  
**Unique Project #:** ECAD-512

| <b>Site/Facility Representative(s):</b>        | <b>Point of Contact</b>             |
|------------------------------------------------|-------------------------------------|
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**Report Preparer**  
**Signature/Date**

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Edward Simas, Inspector  
NPDES Enforcement Section 1, (3ED32)

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Date

**Supervisor**  
**Signature/Date**

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Michael Greenwald, Acting NPDES Section 1 Chief  
NPDES Enforcement Section 1 (3ED32)

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Date

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## I. Introduction

On May 15, 2024, an inspection team from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a domestic wastewater inspection of the West Virginia Department of Agriculture, Guthrie Center (hereinafter, “the facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s NPDES WVDEP Permit No. WVG550262 (hereinafter, the “Permit”) and applicable State and Federal regulations.

### A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at 1:00PM for the inspection. Inspectors met with the following facility representatives:

**Table 1: Inspection Attendee List**

| Name                                             | Affiliation          | Telephone      | Email                   |
|--------------------------------------------------|----------------------|----------------|-------------------------|
| <b>EPA Region III Inspectors and Contractors</b> |                      |                |                         |
| Edward Simas                                     | Lead Inspector       | (215) 814-2120 | Simas.Edward@epa.gov    |
| Dominic Cotton                                   | Secondary Inspector  | (215) 814-2046 | Cotton.Dominic@epa.gov  |
| <b>Site/Facility Representatives</b>             |                      |                |                         |
| Janice Cottrell                                  | Plant Operator       | (304) 761-0277 | jcottrell@wvda.us       |
| Wayne Fisher                                     | Maintenance Mechanic | (304) 610-9738 | wfisher@wvda.us         |
| <b>State or County Representatives</b>           |                      |                |                         |
| Morgan Agee                                      | State Inspector      | (681) 341-8979 | Morgan.l.agee@wv.gov    |
| Mandie Simpson                                   | State Inspector      | (304) 210-4356 | Mandie.j.simpson@wv.gov |

Edward Simas and Dominic Cotton displayed their credentials to Ms. Cottrell (“plant operator”) at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Attachment 2. The EPA Inspection Team informed the plant operator that any information that the Facility deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures.

### B. Weather and Precipitation Conditions

During the inspection, the weather was hot and humid with scattered showers. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below:

**Table 2. Precipitation Data**

| Station Name                        | Date      | Precipitation Amount (inches) <sup>1</sup> |
|-------------------------------------|-----------|--------------------------------------------|
| Sissonville 1 SW, WV US USC00468191 | 5/10/2024 | 0.06                                       |
| Sissonville 1 SW, WV US USC00468191 | 5/11/2024 | 0.11                                       |
| Sissonville 1 SW, WV US USC00468191 | 5/12/2024 | 0.10                                       |
| Sissonville 1 SW, WV US USC00468191 | 5/13/2024 | 0.00                                       |
| Sissonville 1 SW, WV US USC00468191 | 5/14/2024 | 0.08                                       |
| Sissonville 1 SW, WV US USC00468191 | 5/15/2024 | 0.20                                       |

### C. Summary of the Site/Facility

The WV Department of Agriculture, Guthrie Center operates a wastewater treatment plant that is designed for an average of 18,000 GPD of flow and receives wastewater from an estimated 10 – 15 residential houses in the area. The plant operator is unaware of the exact number of connections to the plant. The general permit allows the facility to discharge treated sewage into the Fisher Branch of the Pocatalico River. The Permit applies to sewage treatment and systems of domestic sewage only with a design capability of 50,000 gallons per day or less. The facility has one operator (the plant operator previously discussed) that is class S certified and one maintenance mechanic (Mr. Wayne Fisher) that services the facility. The facility has a single rectangular tank that is divided into the influent sludge, aeration, and clarifier chambers. A pump station is located about a mile southeast of the facility. Following the clarifier, wastewater flows through a chlorine contact chamber before discharging to Outfall 001. During the inspection, the plant operator stated that chlorine tablets are added every other day as the facility only has an operator every other day. According to a call with the plant operator on June 24, 2024, there is now an operator every day at the plant. It is unclear if the chlorine tablets are still added every other day. The plant has staff on site daily Monday – Friday from 8:00AM – 4:00PM. The plant operates 24/7 and does not have staff outside of working hours. The plant also does not have a remote alarm system, and an operator must be within viewing and hearing distance of the plant to notice an alarm. The plant also does not have any backup electrical power available.

The plant operator also stated the collection system infrastructure is dated. The facility lined one of the worst manholes (“Manhole 3”) located around the nearby lake recently. It is unclear as to the status of the rest of the plant’s manholes. The plant also does not have a digital method of calculating flow. Flow is calculated manually through time clocks for the past two years at the plant. Prior to using the time clocks, the plant utilized a third-party service that was producing inaccurate data (Attachment 3 & Photo P5150092). BOD and Fecal Coliform bench records are

<sup>1</sup> Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

located in Attachment 5. The plant does not have a sludge hauling schedule, however it hires “Stans Backhoe and Ditch Service” to haul the sludge as needed. The latest sludge invoice is dated September 28, 2023 and is the most recent. The plant does not currently have a schedule for wasting sludge. In the past – sludge used to be wasted every other day, with the plant down about 10-15 minutes to accomplish this. However, the plant diverged from this schedule recently due to servicing a blockage in the wasted sludge tank pipe. It is unclear what the current frequency is for wasting sludge. . The plant operator receives training from Cedar Lakes every two years. This is the same facility that gave the plant operator her class S wastewater license. The plant operator documents pump operation time and flow data in her bench sheets (P5150091). A third-party company, “Sturm Environmental Services”, samples and analyses all other parameters within the Permit.

## II. Facility Activity

During the inspection, the EPA Inspection Team observed the entire plant and collection system. This includes: the pump station, influent sludge chamber, aeration chamber, clarifier, chlorine contact chamber, and Outfall 001. The inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Dominic Cotton, and are provided in Attachment 1.

## III. Observations

### Reporting & Monitoring Data

- (1) Section B.3 “Other Requirements” of the Permit states, “All required monitoring and reporting shall be submitted electronically to the Division of Water & Waste Management within 25 days of the end of the reporting period. Additional information pertaining to effluent monitoring and reporting can be found in Section III of Appendix A of this permit.”
- (2) Appendix A.III. Monitoring and Reporting: 1. Representative Sampling, Sample Type and Sampling Period of the Permit states, “Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity and during normal operation. “Grab” samples are required for all regulated pollutant parameters.”

**Observation 1:** The facility had a total of 38 effluent limit exceedances according to EPA’s (“Enforcement and Compliance History Online”) public website from 6/30/2019 to 6/30/2023 at Outfall 001. This included: (3) BOD, 5-day, 20 deg C, (3) Chlorine, total residual, (17) Coliform, fecal general, (3) Flow, in conduit or thru treatment plant, (1) Nitrogen, ammonia total [as N], (7) Oxygen, dissolved [DO], (1) pH, and (3) Solids, total suspended exceedances. Attachment 3 summarizes the effluent limit exceedances in “Effluent Limit Exceedances” tab. Table 3 summarizes this below.

**Table 3. NPDES Permit No. WVG550262 effluent exceedances from 6/30/2019 – 6/30/2023**

| Monitoring Period End Date | Parameter Name                           | DMR Value         | Permit Limit   | Units                | Limit Type          |
|----------------------------|------------------------------------------|-------------------|----------------|----------------------|---------------------|
| 6/30/2023                  | Oxygen, dissolved [DO]                   | 4.81              | 6              | mg/L                 | INST MIN            |
| 6/30/2023                  | BOD, 5-day, 20 deg. C                    | 7                 | 5              | mg/L                 | MO AVG              |
| 3/31/2023                  | Oxygen, dissolved [DO]                   | 5                 | 6              | mg/L                 | INST MIN            |
| 12/31/2022                 | pH                                       | 5.8               | 6              | SU                   | INST MIN            |
| 12/31/2022                 | Solids, total suspended                  | 42                | 30             | mg/L                 | MO AVG              |
| 9/30/2022                  | Oxygen, dissolved [DO]                   | 4.73              | 6              | mg/L                 | INST MIN            |
| 9/30/2022                  | Solids, total suspended                  | 50                | 30             | mg/L                 | MO AVG              |
| 9/30/2022                  | Coliform, fecal general                  | 2419.6            | 200            | MPN/100mL            | MO GEOMN            |
| 9/30/2022                  | Coliform, fecal general                  | 2419.6            | 500            | MPN/100mL            | INST MAX            |
| 9/30/2022                  | Coliform, fecal general                  | 2419.6            | 400            | MPN/100mL            | DAILY MX            |
| 6/30/2022                  | Oxygen, dissolved [DO]                   | 4.38              | 6              | mg/L                 | INST MIN            |
| 6/30/2022                  | BOD, 5-day, 20 deg. C                    | 6.2               | 5              | mg/L                 | MO AVG              |
| 6/30/2022                  | Flow, in conduit or thru treatment plant | 0.0187            | 0.018          | MGD                  | DAILY MX            |
| 3/31/2022                  | Oxygen, dissolved [DO]                   | 4.76              | 6              | mg/L                 | INST MIN            |
| 12/31/2021                 | Oxygen, dissolved [DO]                   | 5.11              | 6              | mg/L                 | INST MIN            |
| 6/30/2021                  | Flow, in conduit or thru treatment plant | 0.0245            | 0.018          | MGD                  | DAILY MX            |
| 3/31/2021                  | Coliform, fecal general                  | 1203.3            | 200            | MPN/100mL            | MO GEOMN            |
| 3/31/2021                  | Coliform, fecal general                  | 1203.3            | 500            | MPN/100mL            | INST MAX            |
| 3/31/2021                  | Coliform, fecal general                  | 1203.3            | 400            | MPN/100mL            | DAILY MX            |
| 9/30/2020                  | Coliform, fecal general                  | 2419.6            | 200            | MPN/100mL            | MO GEOMN            |
| 9/30/2020                  | Coliform, fecal general                  | 2419.6            | 500            | MPN/100mL            | INST MAX            |
| 9/30/2020                  | Coliform, fecal general                  | 2419.6            | 400            | MPN/100mL            | DAILY MX            |
| 6/30/2020                  | Oxygen, dissolved [DO]                   | 3.14              | 6              | mg/L                 | INST MIN            |
| 6/30/2020                  | BOD, 5-day, 20 deg. C                    | 6.5               | 5              | mg/L                 | MO AVG              |
| 6/30/2020                  | Coliform, fecal general                  | 2419.6            | 400            | MPN/100mL            | DAILY MX            |
| 6/30/2020                  | Coliform, fecal general                  | 2419.6            | 500            | MPN/100mL            | INST MAX            |
| 3/31/2020                  | Coliform, fecal general                  | 1553.1            | 200            | MPN/100mL            | MO GEOMN            |
| 3/31/2020                  | Coliform, fecal general                  | 1553.1            | 500            | MPN/100mL            | INST MAX            |
| 3/31/2020                  | Coliform, fecal general                  | 1553.1            | 400            | MPN/100mL            | DAILY MX            |
| <del>12/31/2019</del>      | <del>Solids, total suspended</del>       | <del>32</del>     | <del>30</del>  | <del>mg/L</del>      | <del>MO AVG</del>   |
| <del>12/31/2019</del>      | <del>Coliform, fecal general</del>       | <del>2419.6</del> | <del>400</del> | <del>MPN/100mL</del> | <del>DAILY MX</del> |
| <del>12/31/2019</del>      | <del>Coliform, fecal general</del>       | <del>2419.6</del> | <del>200</del> | <del>MPN/100mL</del> | <del>MO GEOMN</del> |

|                       |                                                     |                   |                  |                      |                     |
|-----------------------|-----------------------------------------------------|-------------------|------------------|----------------------|---------------------|
| <del>12/31/2019</del> | <del>Coliform, fecal general</del>                  | <del>2419.6</del> | <del>500</del>   | <del>MPN/100mL</del> | <del>INST-MAX</del> |
| <del>9/30/2019</del>  | <del>Flow, in conduit or thru treatment plant</del> | <del>0.144</del>  | <del>0.018</del> | <del>MGD</del>       | <del>DAILY-MX</del> |
| <del>9/30/2019</del>  | <del>Chlorine, total residual</del>                 | <del>0.0295</del> | <del>0.028</del> | <del>mg/L</del>      | <del>MO-AVG</del>   |
| <del>6/30/2019</del>  | <del>Nitrogen, ammonia total [as N]</del>           | <del>4.92</del>   | <del>3</del>     | <del>mg/L</del>      | <del>MO-AVG</del>   |
| <del>6/30/2019</del>  | <del>Chlorine, total residual</del>                 | <del>0.07</del>   | <del>0.028</del> | <del>mg/L</del>      | <del>MO-AVG</del>   |
| <del>6/30/2019</del>  | <del>Chlorine, total residual</del>                 | <del>0.07</del>   | <del>0.057</del> | <del>mg/L</del>      | <del>DAILY-MX</del> |

**Observation 2:** The permittee did not sample and analyze 25 permitted parameters for the monitoring end date period of 3/31/2024 (Attachment 3 – “Discharge Monitoring Reports 2019-2024”). The 25 permitted parameters are included in Table 4 below.

**Table 4. NPDES Permit No. WVG550262 No Sample/Analysis**

| Outfall # | Monitoring Period End Date | Parameter Name                           | DMR Value |
|-----------|----------------------------|------------------------------------------|-----------|
| 1         | 3/31/2024                  | Oxygen, dissolved [DO]                   | No Data   |
| 1         | 3/31/2024                  | BOD, 5-day, 20 deg. C                    | No Data   |
| 1         | 3/31/2024                  | BOD, 5-day, 20 deg. C                    | No Data   |
| 1         | 3/31/2024                  | BOD, 5-day, 20 deg. C                    | No Data   |
| 1         | 3/31/2024                  | BOD, 5-day, 20 deg. C                    | No Data   |
| 1         | 3/31/2024                  | BOD, 5-day, 20 deg. C                    | No Data   |
| 1         | 3/31/2024                  | pH                                       | No Data   |
| 1         | 3/31/2024                  | pH                                       | No Data   |
| 1         | 3/31/2024                  | Solids, total suspended                  | No Data   |
| 1         | 3/31/2024                  | Solids, total suspended                  | No Data   |
| 1         | 3/31/2024                  | Solids, total suspended                  | No Data   |
| 1         | 3/31/2024                  | Solids, total suspended                  | No Data   |
| 1         | 3/31/2024                  | Solids, total suspended                  | No Data   |
| 1         | 3/31/2024                  | Nitrogen, ammonia total [as N]           | No Data   |
| 1         | 3/31/2024                  | Nitrogen, ammonia total [as N]           | No Data   |
| 1         | 3/31/2024                  | Nitrogen, ammonia total [as N]           | No Data   |
| 1         | 3/31/2024                  | Nitrogen, ammonia total [as N]           | No Data   |
| 1         | 3/31/2024                  | Nitrogen, ammonia total [as N]           | No Data   |
| 1         | 3/31/2024                  | Flow, in conduit or thru treatment plant | No Data   |
| 1         | 3/31/2024                  | Chlorine, total residual                 | No Data   |
| 1         | 3/31/2024                  | Chlorine, total residual                 | No Data   |
| 1         | 3/31/2024                  | Chlorine, total residual                 | No Data   |

**Observation 3:** The permittee may not have analyzed flow “representative” of the monitored activity during normal operations. Table 3 above notes three outlier flows of “144,000 gal/day”, “24,500 gal/day”, and “18,700 gal/day”. These flows would all exceed the designed capacity of the plant at “18,000 gal/day”.

**Observation 4:** The plant operator stated that a previous third-party analyzing flow reported “No Discharge” in all parameters within three different monitoring periods including: 1/12/2024, 10/16/2023, and 1/5/2021. Table 5 below reports the 75 parameters. The plant operator states the facility discontinued with the third party about two years ago, and that she manually monitors flow utilizing a bucket and time clocks at the facility. However, substitutes for her often do not understand how to analyze the flow resulting in the inaccurate data for 2023 and 2024.

**Table 5: NPDES Permit No. WVG550262 “No Data” Reported**

| Outfall # | Monitoring Period End Date | Parameter Name                 | DMR Value    |
|-----------|----------------------------|--------------------------------|--------------|
| 1         | 12/31/2023                 | Oxygen, dissolved [DO]         | No Discharge |
| 1         | 12/31/2023                 | BOD, 5-day, 20 deg. C          | No Discharge |
| 1         | 12/31/2023                 | BOD, 5-day, 20 deg. C          | No Discharge |
| 1         | 12/31/2023                 | BOD, 5-day, 20 deg. C          | No Discharge |
| 1         | 12/31/2023                 | BOD, 5-day, 20 deg. C          | No Discharge |
| 1         | 12/31/2023                 | BOD, 5-day, 20 deg. C          | No Discharge |
| 1         | 12/31/2023                 | pH                             | No Discharge |
| 1         | 12/31/2023                 | pH                             | No Discharge |
| 1         | 12/31/2023                 | Solids, total suspended        | No Discharge |
| 1         | 12/31/2023                 | Solids, total suspended        | No Discharge |
| 1         | 12/31/2023                 | Solids, total suspended        | No Discharge |
| 1         | 12/31/2023                 | Solids, total suspended        | No Discharge |
| 1         | 12/31/2023                 | Solids, total suspended        | No Discharge |
| 1         | 12/31/2023                 | Nitrogen, ammonia total [as N] | No Discharge |
| 1         | 12/31/2023                 | Nitrogen, ammonia total [as N] | No Discharge |
| 1         | 12/31/2023                 | Nitrogen, ammonia total [as N] | No Discharge |
| 1         | 12/31/2023                 | Nitrogen, ammonia total [as N] | No Discharge |

|   |            |                                          |              |
|---|------------|------------------------------------------|--------------|
| 1 | 12/31/2023 | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 12/31/2023 | Flow, in conduit or thru treatment plant | No Discharge |
| 1 | 12/31/2023 | Chlorine, total residual                 | No Discharge |
| 1 | 12/31/2023 | Chlorine, total residual                 | No Discharge |
| 1 | 12/31/2023 | Chlorine, total residual                 | No Discharge |
| 1 | 12/31/2023 | Coliform, fecal general                  | No Discharge |
| 1 | 12/31/2023 | Coliform, fecal general                  | No Discharge |
| 1 | 12/31/2023 | Coliform, fecal general                  | No Discharge |
| 1 | 9/30/2023  | Oxygen, dissolved [DO]                   | No Discharge |
| 1 | 9/30/2023  | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 9/30/2023  | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 9/30/2023  | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 9/30/2023  | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 9/30/2023  | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 9/30/2023  | pH                                       | No Discharge |
| 1 | 9/30/2023  | pH                                       | No Discharge |
| 1 | 9/30/2023  | Solids, total suspended                  | No Discharge |
| 1 | 9/30/2023  | Solids, total suspended                  | No Discharge |
| 1 | 9/30/2023  | Solids, total suspended                  | No Discharge |
| 1 | 9/30/2023  | Solids, total suspended                  | No Discharge |
| 1 | 9/30/2023  | Solids, total suspended                  | No Discharge |
| 1 | 9/30/2023  | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 9/30/2023  | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 9/30/2023  | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 9/30/2023  | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 9/30/2023  | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 9/30/2023  | Flow, in conduit or thru treatment plant | No Discharge |
| 1 | 9/30/2023  | Chlorine, total residual                 | No Discharge |
| 1 | 9/30/2023  | Chlorine, total residual                 | No Discharge |
| 1 | 9/30/2023  | Chlorine, total residual                 | No Discharge |
| 1 | 9/30/2023  | Coliform, fecal general                  | No Discharge |
| 1 | 9/30/2023  | Coliform, fecal general                  | No Discharge |
| 1 | 9/30/2023  | Coliform, fecal general                  | No Discharge |
| 1 | 12/31/2020 | Oxygen, dissolved [DO]                   | No Discharge |
| 1 | 12/31/2020 | BOD, 5-day, 20 deg. C                    | No Discharge |

|   |            |                                          |              |
|---|------------|------------------------------------------|--------------|
| 1 | 12/31/2020 | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 12/31/2020 | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 12/31/2020 | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 12/31/2020 | BOD, 5-day, 20 deg. C                    | No Discharge |
| 1 | 12/31/2020 | pH                                       | No Discharge |
| 1 | 12/31/2020 | pH                                       | No Discharge |
| 1 | 12/31/2020 | Solids, total suspended                  | No Discharge |
| 1 | 12/31/2020 | Solids, total suspended                  | No Discharge |
| 1 | 12/31/2020 | Solids, total suspended                  | No Discharge |
| 1 | 12/31/2020 | Solids, total suspended                  | No Discharge |
| 1 | 12/31/2020 | Solids, total suspended                  | No Discharge |
| 1 | 12/31/2020 | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 12/31/2020 | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 12/31/2020 | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 12/31/2020 | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 12/31/2020 | Nitrogen, ammonia total [as N]           | No Discharge |
| 1 | 12/31/2020 | Flow, in conduit or thru treatment plant | No Discharge |
| 1 | 12/31/2020 | Chlorine, total residual                 | No Discharge |
| 1 | 12/31/2020 | Chlorine, total residual                 | No Discharge |
| 1 | 12/31/2020 | Chlorine, total residual                 | No Discharge |
| 1 | 12/31/2020 | Coliform, fecal general                  | No Discharge |
| 1 | 12/31/2020 | Coliform, fecal general                  | No Discharge |
| 1 | 12/31/2020 | Coliform, fecal general                  | No Discharge |

## Operation and Maintenance

Appendix A.II. Operation and Maintenance: 1. Proper Operation and Maintenance 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....”

**Observation 5:** The facility's diffuser heads appear to be worn out, and aeration was observed to be unevenly distributed throughout the aeration chamber (Photo P5150057 – P5150059). The plant operator stated that the heads will be replaced in the future. The diffuser pump was also out of service for three days about 2-3 weeks before the inspection.

Appendix A I. 3 “Duty to Mitigate” of the Permit states, “The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit, which has a reasonable likelihood of adversely affecting human health or the environment.”

**Observation 6:** Airline pipe is not welded into tank, leaving a gap and allowing the potential for untreated sewage to funnel out of this area at a high water level. There are already signs of discharge out of the tank (Photo: P5150079, P5150080).

The is a hole in the piping entering into the influent sludge chamber. Staining is present indicating wastewater has flowed out of tank (Photo: P5150050, P5150062).

Appendix A. I. Management Conditions: 12. Water Quality states, “This discharge shall not cause or materially contribute to: distinctly visible floating or settleable solids, suspended solids, scum, foam or oily slicks;...”

**Observation 7:** The clarifier appeared cloudy. Floating solids can be seen in multiple locations (Photos P5150064 – P5150065, P5150067 – P5150072).

Algal overgrowth can be seen surrounding piping and skimmers (Photo P5150066).

Large amounts of suspended sludge appeared to be leaving the contact chamber (Photos P5150081 – P5150082, P5150086 – P5150089).

Part B. 26 “Other Requirements” of the Permit states, “Treatment system utilizing steel tanks shall be required to provide Cathodic Protection and institute a proper Operation & Maintenance (O&M) program, including compliance testing every three (3) years performed by a WV Certified Class D or E Tester. In lieu of the required testing, the anode pack(s) must be inspected yearly and replaced as necessary to prevent pre-mature corrosion of the treatment plant.”

**Observation 8:** Cathodic protection was stripped away from the wastewater tank (Photo P5150077 - P5150078).

#### IV. Records Review

Prior to the opening conference, the EPA Inspection Team reviewed documentation including:

- Discharge Monitoring Reports from June 2019 – June 2024
- WVDEP 2024 inspection report and 2021 inspection report.

The EPA Inspection Team requested bench and analysis data from 2022 – 2024 as well as the most recent sludge hauling documentation. This information was requested during the inspection on 5/15/2024 and after the inspection on 6/7/2024. The following was provided as a result of the request:

- Bench data for all parameters from 2022 – 2024. Bench data including percent MLSS (“Mixed liquor suspended solids”), percentage return activated sludge (“RAS”) solids

from bench jar testing 2021 – 2023, and pump/flow data from 2021 – 2023 was provided on 6-21-2024 (9-18-23 data in Photo P5150090)

- Laboratory analyses from 2022 - 2024 provided on 6-18-2024.
- 2022 - 2024 pH calibration records. Facility provided 2022 records on 6/25/2024 and the 2024 calibration records on 6/21/2024 (Attachment 4)
- Sludge Hauling Records (Invoice provided on 6/24/2024 – Attachment 6)

## **V. Closing Conference**

After the facility walk, the EPA Inspection Team met with the facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by 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 EPA reviewed additional materials following the inspection. The inspection concluded at 4:45PM.

## **VI. List of Attachments**

- Attachment 1: Photo Log
- Attachment 2: Sewage 2020 GP Final
- Attachment 3: 2022 – 2024 pH Calibration Data
- Attachment 4: BOD and Fecal Bench Data
- Attachment 5: Sludge Hauling Invoice