

INSPECTION REPORT

Inspection Entry Date/Time	09/19/2023 08:50 a.m. (ET)	Announced: Yes	
Inspection Exit Date/Time	09/19/2023 01:32 p.m. (ET)	Access: Granted	
Weather	Sunny, 65° F		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES), Wastewater Treatment Plant (WWTP)		
Type of Inspection	Follow-up Inspection (FUI)		
Permittee Name	Scioto County Commissioners		
Facility or Site Name	Wheelersburg WWTP		
Facility/Site Physical Address	2974 Hayport Road		
City, State, Zip Code	Wheelersburg, OH 45694		
County/Borough/Parish	Scioto County		
Facility GPS Coordinates	38.72017, -82.86147		
FRS ID	110000915038		
Permit Number(s) (If Applicable)	OH0050016		
SIC and/or NAICS	4952		
Regulatory Representatives Participating in Inspection:			
Title	Name	Organization	
Environmental Engineer	Andi Hodaj	EPA Region 5	
Chemist	Kenneth Gunter	EPA Region 5	
Lead Inspector:			
Andi Hodaj	ANDI HODAJ Digitally signed by ANDI HODAJ Date: 2023.12.04 17:13:45 -06'00'		
	EPA REGION 5	hodaj.andi@epa.gov	(312) 353-4645
Supervisor Review:			
Molly Smith	MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2023.12.07 09:37:36 -06'00'		
	EPA REGION 5	smith.molly@epa.gov	

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

EPA REGION 5 Lead inspector, Andi Hodaj, arrived at the Wheelersburg WWTP (the “Site” or “Facility”), located at 2974 Hayport Road, Wheelersburg, Ohio 45694, at 08:50 a.m. (ET) on September 19, 2023, for an announced inspection. EPA REGION 5 Lead inspector presented credentials to JP Pickelsimer, Jeff Cox, Andrew Schackart and informed them that this was an EPA REGION 5 inspection to investigate elements of the Clean Water Act (CWA) . This report is based on information supplied by Wheelersburg WWTP representatives, direct observations made by the EPA REGION 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 5 inspectors, physical evidence collected by the EPA REGION 5 inspectors, measurements taken by EPA REGION 5 inspectors, verbal or written statements made by information supplied by Wheelersburg WWTP representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 5 inspectors by Wheelersburg WWTP representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 5	Andi Hodaj	Lead Inspector	Yes	Yes
EPA Region 5	Kenneth Gunter	Chemist	No	Yes
Scioto County Sanitary Department	Jerry Pickelsimer	Sanitary Engineer	Yes	Yes
Wheelersburg WWTP	Andrew Schackart	Lab Technician	Yes	Yes
Scioto County Sanitary Department	Jeff Cox	Class II Operator	Yes	Yes
Scioto County Sanitary Department	Ryan Smith	Treatment Coordinator	No	Yes

Facility/Site Description

EPA REGION 5 lead inspector confirmed the following facility information:

The Facility is one of eight wastewater treatment plants publicly owned by Scioto County. It has a design flow of 1.2 million gallons per day (MGD) and serves approximately 7,000 residents connected to a sanitary-only collection system, from the census-designated places of Wheelersburg and Franklin Furnace. No industrial users discharge process waste to the WWTP, but the Pepsi facility discharges sanitary waste to the WWTP. The Facility consists of an inflow structure, a bar screen, a trash rake, a flow splitter box, an influent chamber, two oxidation ditches, another splitter box, three clarifiers, an ultraviolet (UV) disinfection channel, four aerobic digester tanks and a sludge belt press. The Facility discharges into Pine Creek via outfall 001.

Scioto County operates 90 pump stations and 134 miles of gravity sewer in its collection system area. The Wheelersburg WWTP houses a lab on site where it receives and analyzes samples from all eight wastewater treatment plants for Total Suspended Solids (TSS), Ammonia – Nitrogen (NH₃), Carbonaceous Biochemical Oxygen Demand (CBOD) and Escherichia Coli (E.coli).

Facility/Site Information**Location(s)**

Location/Area/Sub-area	Description
Headworks	The headworks consist of the influent box, trash bars, automatic spiral screen and an autosampler.
Laboratory	The Wheelersburg WWTP Laboratory receives and analyzes samples from the Wheelersburg WWTP and 7 other WWTPs operated by the Scioto County Sanitary Department.
Outfall 001	Outfall 001 into Pine Creek.
Secondary treatment	The secondary treatment consists of the oxidation ditches, splitter box, three clarifiers and UV disinfection tank.
Sludge handling area	The sludge handling area includes four aerobic digester tanks, the sludge press and two sludge storing sheds.

SECTION II – OBSERVATIONS

Location: Headworks	
Observation #: AH2-OB-001	Date: 10/02/2023
EPA observed three inflow pipes at the headworks. One from Wheelersburg, one from Franklin Furnace and the return flow pipe from the treatment plant. The headworks also included an automatic rotary drum screen and a refrigerated autosampler. The automatic rotary drum screen was not working at the time of the inspection. Mr. Ryan Smith explained later during the inspection that the screen operates automatically based on the water level in the inflow channel; however, EPA did not observe it operate within the 3-hour window during which there was continuous flow from the inflow pipes. EPA observed a full bottle inside the autosampler and no thermometer inside the refrigerator of the autosampler. Mr. Andrew Schackart stated that he takes grab samples of the influent and has not used the autosampler.	
Photos 1. RIMG3209.JPG 2. RIMG3207.JPG 3. RIMG3212.JPG 4. RIMG3210.JPG 5. RIMG3208.JPG 6. RIMG3221.JPG	

Location: Secondary treatment	
Observation #: AH2-OB-002	Date: 10/02/2023
EPA observed the two oxidation ditches where all eight aeration rotors were in operation. Flow from the aeration ditches is split into three clarifiers (north, south and west clarifier) via two splitter boxes. EPA observed dark brown water and a layer of foam in one of the splitter boxes. Photo RIMG3213. EPA observed scum and bubbles floating on top of the west clarifier. Photo RIMG3216. EPA observed floating scum in the old chlorine contact tank before the Ultraviolet (UV) channel. Photos RIMG3217 and RIMG3219. The old chlorine contact	

tank was used to treat water with chlorine before discharge, but since the installation of the UV disinfection system, it serves as an equalization tank before water is routed to the UV channel. EPA observed that the UV control panel was not properly working at the time of the inspection. Photo RIMG3223. EPA observed the discharge through the v-notch weir at the sampling location for outfall 001. EPA did not observe any turbidity or discoloration in the water being discharged, at the time of the inspection. Photo RIMG3220.

Photos

1. [RIMG3214.JPG](#)
2. [RIMG3215.JPG](#)
3. [RIMG3213.JPG](#)
4. [RIMG3211.JPG](#)
5. [RIMG3216.JPG](#)
6. [RIMG3217.JPG](#)
7. [RIMG3223.JPG](#)
8. [RIMG3219.JPG](#)

Location: Sludge handling area**Observation #:** AH2-OB-003**Date:** 11/16/2023

EPA observed two sludge holding tanks (aerobic digesters) at the site. Each tank is split into two via a concrete wall. Only one tank was actively receiving sludge at the time of the inspection. The other sludge tanks were full and covered with growing vegetation. Photos RIMG3224 - RIMG3227. According to Mr. Smith, the Facility is in the process of cleaning out the tanks, so they are ready to receive new sludge. EPA observed that the belt press was not operating at the time of the inspection. Mr. Smith stated that the Facility presses sludge as needed once or twice per week. EPA observed 4 sludge drying beds at the south end of the Facility. Mr. Smith stated that the Facility was in the process of removing the sludge from the drying beds and was planning on using them again to store sludge removed from the oxidation ditches. Photos RIMG3230 and RIMG3231. The sludge drying beds were not used since 2006, when the sludge belt press was placed in operation. EPA also observed the new sludge shed, where the Facility is storing sludge that is mixed with woodchips for composting with the goal of land applying the composted sludge. Photo RIMG3232.

Photos

1. [RIMG3224.JPG](#)
2. [RIMG3225.JPG](#)
3. [RIMG3226.JPG](#)
4. [RIMG3228.JPG](#)
5. [RIMG3229.JPG](#)
6. [RIMG3231.JPG](#)
7. [RIMG3230.JPG](#)
8. [RIMG3232.JPG](#)
9. [RIMG3227.JPG](#)

Location: Outfall 001**Observation #:** AH2-OB-004**Date:** 11/20/2023

EPA observed outfall 001 discharging into Pine Creek. EPA observed the outfall signage and the receiving water immediately downstream of the discharge.

Photos

1. [RIMG3218.JPG](#)
2. [RIMG3220.JPG](#)
3. [RIMG3222.JPG](#)
4. [RIMG3234.JPG](#)
5. [RIMG3235.JPG](#)
6. [RIMG3233.JPG](#)

Location: Laboratory**Observation #:** AH2-OB-005**Date:** 11/29/2023

The Wheelersburg WWTP lab services 8 different wastewater treatment plants and 10 different sewer collection systems. Temperature, Dissolved Oxygen, pH, TSS, Ammonia- Nitrogen, Orthophosphate, CBOD and E.coli are measured in-house and the rest of the permitted parameters are analyzed by a contract lab (MASI Environmental Lab). EPA observed influent samples collection performed by Andrew Schackart. The autosampler was not used for sample collection (technician indicated that autosampler was not operational) for composite sampling. Chain of custody sheets were not used for sample collection and analysis at the Wheelersburg WWTP.

EPA observed that sample collection bench sheets do not adequately document sample collection and analysis times.

EPA observed Sample Receiving and Handling performed by Andrew Schackart. Standard Operating Procedures (SOP) were not in place for the collection and documentation for handling of compliance samples. EPA did not observe documentation showing that holding times were met and preservation requirements are being properly addressed. Through discussion with technician, EPA understood that samples for oil and grease analysis were collected in a plastic container.

EPA observed the lab technician performing calibration of the pH meter. Two of the three buffer solutions were expired, with expiration date of January 2021. EPA observed that the buffer solution containers were not labeled).

EPA observed that the lab does not periodically check and document the thermometer's bias (within the temperature range of use) against a reference thermometer certified by the National Institute of Standards and Technology (NIST, formerly National Bureau of Standards) and using tolerances suggested in NIST Handbook 105-6. Standard Operating procedures are not in place for the collection of temperature data. Incubator and refrigerator thermometers were not kept in a heat sink to enable appropriate monitoring of required conditions.

EPA observed that the drying oven thermometer showed a temperature of 101 degrees Celsius, and did not meet the method-required 103 to 105 degree Celsius requirement.

EPA observed the desiccant used in TSS analysis and noted it to have a pink color. The desiccant was not being monitored or replaced when desiccant is pink in appearance.

EPA observed the analytical balance used for TSS analysis. EPA noted that the balance was last certified on

October 26, 2022, and was not due to be reserviced until October 26, 2023. Standard Operating Procedures were in place for TSS analyses. However, the lab technician was not aware of the periodic (weekly or daily) evaluation of precision and accuracy requirement by the Standard Method 2540 D (TSS)

EPA discussed the ammonia analysis procedures with the lab technician. The lab had an SOP for the ammonia analysis. EPA could not review records for the collection and evaluation of required lab-fortified matrix, matrix duplicates or lab-fortified blanks for the ammonia analysis, as records were not available. Annual method detection limit studies along with Quality Control (QC) charts for the ammonia analysis were not available for review. EPA could not review required records of lab technician Initial demonstrations of capability, as they were not maintained.

EPA discussed Wheelersburg's Discharge Monitoring Quality Assurance (DMRQA) Study 43 results with the lab technician. Wheelersburg failed the TSS portion of the DMRQA, with results being biased low. EPA observed that Wheelersburg reported results for Fecal Coliform instead of E.coli, as required by its NPDES permit.

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Lab Bench Sheets (usually handwritten)		AOC: Yes
Ref #: AH2-RR-002	Reviewed By: Andi Hodaj	Reviewed Date: 09/19/2023
EPA reviewed ammonia analysis bench sheets and noted that the bench sheets did not document and adhere to the required quality controls.		
Record: Facility SOPs		AOC: Yes
Ref #: AH2-RR-001	Reviewed By: Andi Hodaj	Reviewed Date: 09/19/2023
EPA discussed Wheelersburg's Cleaning Glassware procedures with Andrew Schackart and reviewed the SOP for this activity. It is unclear from discussions with the technician and review of the SOP who is responsible for the cleanliness of the sample collection bottles (sampler or lab tech).		

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREA OF CONCERN

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: AH2-OB-001	Location: Headworks
Regulation and/or Permit Requirement	

NPDES Permit OH0050016 Parts II.E states, "The permittee shall maintain in good working order and operate as efficiently as possible the "treatment works" and "sewerage system" as defined in ORC 6111.01 to achieve compliance with the terms and conditions of this permit and to prevent discharges to the waters of the state, surface of the ground, basements, homes, buildings, etc."

Part III.3. also states "All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."

Part I.B. – INFLUENT MONITORING REQUIREMENTS, requires the Facility to collect 24hr composite samples at the influent.

AOC:

The automatic rotary drum screen was not working at the time of the inspection. Mr. Ryan Smith explained later during the inspection that the screen operates automatically based on the water level in the inflow channel; however, EPA did not observe it operate within the 3-hour window during which there was continuous flow from the inflow pipes. EPA observed a full bottle inside the autosampler and no thermometer inside the refrigerator of the autosampler. Mr. Andrew Schackart stated that he takes grab samples of the influent and has not used the autosampler.

AOC Reference #: AH2-OB-002

Location: Secondary treatment

Regulation and/or Permit Requirement

NPDES Permit OH0050016 Parts III.3. states, "All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."

AOC:

EPA observed dark brown water and a layer of foam in one of the splitter boxes. Photo RIMG3213. EPA observed scum and bubbles floating on top of the west clarifier. Photo RIMG3216. EPA observed floating scum in the old contact tank before the Ultraviolet (UV) channel. Photos RIMG3217 and RIMG3219.

AOC Reference #: AH2-OB-002

Location: Secondary treatment

Regulation and/or Permit Requirement

NPDES Permit OH0050016 Parts III.3. states, "All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."

AOC:

EPA observed that the UV control panel was not properly working at the time of the inspection. Photo RIMG3223.

AOC Reference #: AH2-OB-003	Location: Sludge handling area
Regulation and/or Permit Requirement	
NPDES Permit OH0050016 Parts III.3. states, "All wastewater treatment works shall be operated in a manner consistent with the following: A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."	
AOC: EPA observed two sludge holding tanks (digesters) at the site. Each tank is split into two via a concrete wall. Only one tank was actively receiving sludge at the time of the inspection. The other sludge tanks were full and covered with growing vegetation. Photos RIMG3224 - RIMG3227.	

AOC Reference #: AH2-OB-005	Location: Laboratory
Regulation and/or Permit Requirement	
NPDES Permit OH0050016 Parts III.6. states, "For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information... A. The exact place and date of sampling; B. The person(s) who performed the sampling or measurements;..."	
AOC: The autosampler was not used for sample collection (technician indicated that autosampler was not operational) for composite sampling. Chain of custody sheets are not used for sample collection and analysis at the Wheelersburg WWTP. EPA observed that sample collection bench sheets do not adequately document sample collection and analysis times.	

AOC Reference #: AH2-OB-005	Location: Laboratory
Regulation and/or Permit Requirement	

NPDES Permit OH0050016 Parts III.6. states, "For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information... A. The exact place and date of sampling; B. The person(s) who performed the sampling or measurements;..."

NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."

AOC:

EPA observed Sample Receiving and Handling performed by Andrew Schackart. SOP were not in place for the collection and documentation for handling of compliance samples. Without appropriate documentation it is not clear that holding times are being met and that preservation and sample pretreatment are proper. Through discussion with technician, EPA understood that samples for oil and grease analysis were collected in a plastic container.

AOC Reference #: AH2-OB-005**Location: Laboratory****Regulation and/or Permit Requirement**

NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."

AOC:

EPA observed the lab technician performing calibration of the pH meter. Two of the three buffer solutions were expired, with expiration date January 2021. EPA observed that the buffer solution containers were not labeled.

AOC Reference #: AH2-OB-005**Location: Laboratory****Regulation and/or Permit Requirement**

NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."

AOC:

EPA observed that the lab does not periodically check and document the thermometer's bias (within the temperature range of use) against a reference thermometer certified by the NIST and using tolerances suggested in NIST Handbook 105-6. Standard Operating procedures are not in place for the collection of temperature data. Incubator and refrigerator thermometers were not kept in a heat sink to enable appropriate monitoring of required conditions.

AOC Reference #: AH2-OB-005	Location: Laboratory
Regulation and/or Permit Requirement	
NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."	
AOC:	
EPA observed that the drying oven thermometer showed a temperature of 101 degrees Celsius and did not meet the method-required 103 to 105 degree Celsius requirement.	

AOC Reference #: AH2-OB-005	Location: Laboratory
Regulation and/or Permit Requirement	
NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."	
AOC:	
EPA observed the desiccant used in TSS analysis and noted it to have a pink color. The desiccant was not being monitored and replaced when the color of the desiccant turns pink.	

AOC Reference #: AH2-OB-005	Location: Laboratory
Regulation and/or Permit Requirement	
NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."	
AOC:	
Standard Operating Procedures were in place for TSS analyses. However, the lab technician was not aware of the periodic (weekly or daily) evaluation of precision and accuracy requirement by the method.	

AOC Reference #: AH2-OB-005	Location: Laboratory
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Regulation and/or Permit Requirement
NPDES Permit OH0050016 Parts III.7 states, "The permittee shall retain all of the following records for the wastewater treatment works for a minimum of three years except those records that pertain to sewage sludge disposal, use, storage, or treatment, which shall be kept for a minimum of five years, including: A. All sampling and analytical records (including internal sampling data not reported); B. All original recordings for any continuous monitoring instrumentation; C. All instrumentation, calibration and maintenance records; D. All plant operation and maintenance records;"
AOC: EPA could not review records for the collection and evaluation of required lab-fortified matrix, matrix duplicates and lab-fortified blanks for the ammonia analysis, as records were not available. Annual method detection limit studies along with QC charts for the ammonia analysis were not available for review. EPA could not review required records of lab technician Initial demonstrations of capability as they were not maintained.

AOC Reference #: AH2-OB-005	Location: Laboratory
Regulation and/or Permit Requirement	
NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."	
AOC: EPA discussed Wheelersburg's DMRQA Study 43 results with the lab technician. Wheelersburg failed the TSS portion of the DMRQA with results being biased low. EPA observed that Wheelersburg reported results for Fecal Coliform instead of E.coli, as required by its NPDES permit.	

AOC Reference #: AH2-RR-001	Records Review: Facility SOPs
Regulation and/or Permit Requirement	
AOC: EPA discussed Wheelersburg's Cleaning Glassware procedures with Andrew Schackart and reviewed the SOP for this activity. It is unclear from discussions with the technician and review of the SOP who is responsible for the cleanliness of the sample collection bottles (sampler or lab tech).	

AOC Reference #: AH2-RR-002	Records Review: Lab Bench Sheets (usually handwritten)
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Regulation and/or Permit Requirement
NPDES Permit OH0050016 Parts III.5 states, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."
AOC: EPA reviewed ammonia analysis bench sheets and noted that the bench sheets did not document and adhere to the required quality controls. The bench sheets did not include data for matrix spike/matrix spike duplicates and method blanks.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 5 Lead Inspector held a closing conference with Facility personnel at 01:32 p.m. (ET) on September 19, 2023 for the inspection. During the closing conference, EPA REGION 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

During the closing conference, EPA discussed observations from the inspection with the Facility representatives stating that none these observations consist of formal determination of a violation.

1. Starting with the headworks, EPA noted that the location of influent sampling was not representative of the influent. The autosampler was not in use and the Facility was conducting grab sampling instead of composite sampling.
2. EPA observed scum and bubbles floating on top of the west clarifier.
3. The UV system seemed not to be working at the time of the inspection.
4. Only one aerobic digester tank was actively receiving sludge at the time of the inspection. The other sludge tanks were full and covered with growing vegetation.
5. No chain of custody for samples taken at the Wheelersburg WWTP.
6. Oil and Grease samples taken with plastic container, instead of a glass container.
7. Bench sheets do not adequately document sample collection and analysis times.
8. There is not a systematic log for tracking samples.
9. EPA noted two expired pH buffer solutions.
10. No SOP for collection of temperature data.
11. Thermometers were not kept in heat sinks, and the drying oven thermometer was showing 101 degrees Celsius instead of the required 103 - 105.
12. For the ammonia analysis, EPA noted that records were not available for the collection and evaluation of required lab-fortified matrix and matrix duplicates.
13. In general, quality controls were not performed and/or records were not made available to EPA for review.

Photo(s)

1. [RIMG3236.JPG](#)
2. [RIMG3237.JPG](#)

Communication Log

No additional information received by EPA REGION 5 after exiting the Facility on 09/19/2023.

SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG



Oxidation Ditches			RIMG3211.JPG
09/19/2023 08:09 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.72043, -82.86095166
Overview of the two oxidation ditches at the Wheelersburg WWTP. Camera looking south.			



Inflow pipes			RIMG3212.JPG
09/19/2023 08:09 AM	No CBI	No PII	Photographer: Andi Hodaj
Headworks			38.72043, -82.86095166
Inflow and return pipes at the headworks of the Wheelersburg WWTP. The bigger pipe that is seen discharging in the photo, is the one from the city of Wheelersburg and the smallest one discharging is the return flow from the aerobic digesters. Camera looking north.			



Split box			RIMG3213.JPG
09/19/2023 08:31 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.7197, -82.86141166
One of the two splitting boxes that routes water from the oxidation ditches to two of the clarifiers. Camera looking west.			



North Clarifier			RIMG3214.JPG
09/19/2023 08:33 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.71984666, -82.86135499
North clarifier. Camera looking north.			



South Clarifier			RIMG3215.JPG
09/19/2023 08:33 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.71984666, -82.86135499
The south of three clarifiers at the Wheelersburg WWTP. Camera looking west.			



West Clarifier			RIMG3216.JPG
09/19/2023 08:35 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.71980833, -82.86136666
The west clarifier at the Wheelersburg WWTP. Camera looking west.			



Old chlorine contact tank			RIMG3217.JPG
09/19/2023 08:37 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.71988166, -82.86157833
Old chlorine contact tank used as an equalization tank before water is routed to the UV channel. Camera looking west.			



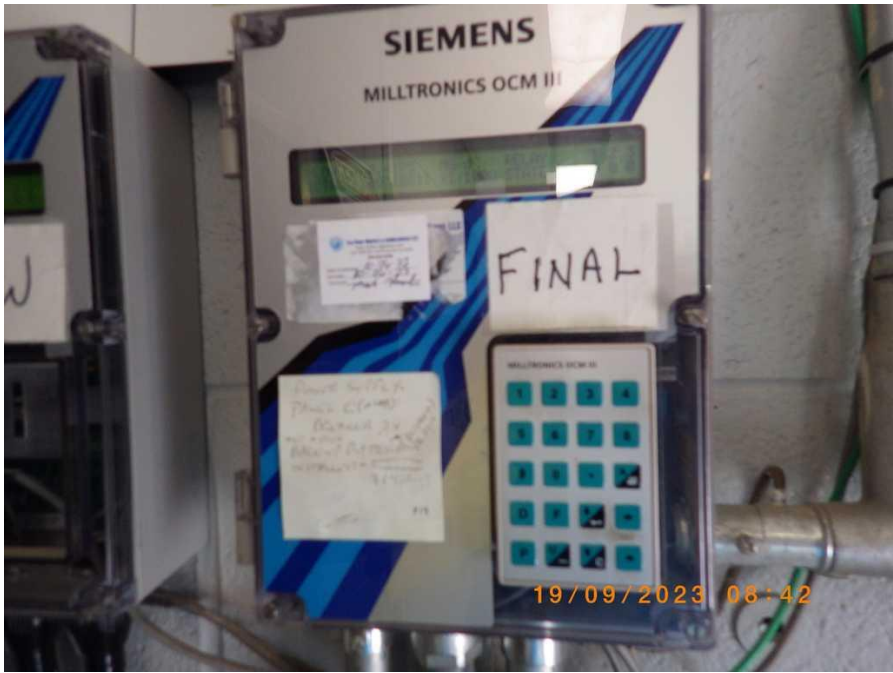
Monitoring location 001			RIMG3218.JPG
09/19/2023 08:37 AM	No CBI	No PII	Photographer: Andi Hodaj
Outfall 001			38.71988166, -82.86157833
Monitoring location for outfall 001 during grab sampling. Camera looking west.			



Old chlorine contact tank			RIMG3219.JPG
09/19/2023 08:41 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.719965, -82.86151666
Old chlorine contact tank. Camera looking west.			



Effluent at monitoring location 001			RIMG3220.JPG
09/19/2023 08:41 AM	No CBI	No PII	Photographer: Andi Hodaj
Outfall 001			38.719965, -82.86151666
Effluent at the monitoring location for outfall 001. Camera looking down.			



Influent flow recorder			RIMG3221.JPG
09/19/2023 08:42 AM	No CBI	No PII	Photographer: Andi Hodaj
Headworks			38.719965, -82.86151666
Influent flow recorder inside the lab.			



Effluent flow recorder			RIMG3222.JPG
09/19/2023 08:42 AM	No CBI	No PII	Photographer: Andi Hodaj
Outfall 001			38.719965, -82.86151666
Effluent flow recorder inside the lab at the Wheelersburg WWTP.			



UV Panel			RIMG3223.JPG
09/19/2023 08:47 AM	No CBI	No PII	Photographer: Andi Hodaj
Secondary treatment			38.71992166, -82.86171999
The UV panel at the UV channel. Camera looking north.			



Aerobic Digester			RIMG3224.JPG
09/19/2023 08:52 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71962, -82.86163666
Aerobic digester tank 1 at the Wheelersburg WWTP. Camera looking south.			



Aerobic digester tank #2			RIMG3225.JPG
09/19/2023 08:52 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71962, -82.86163666
Aerobic digester tank #2. Camera looking south.			



Aerobic digester tank #3			RIMG3226.JPG
09/19/2023 08:56 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71962, -82.86138
Aerobic digester tank #3. Camera looking north.			



Aerobic digester tank #4			RIMG3227.JPG
09/19/2023 08:56 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71962, -82.86138
Aerobic digester tank #4. Camera looking north.			



Sludge belt press			RIMG3228.JPG
09/19/2023 09:00 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71945666, -82.861645
Sludge belt press at the Wheelersburg WWTP. Camera looking south			



Sludge storage shed			RIMG3229.JPG
09/19/2023 09:01 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71942, -82.86132833
Sludge storage shed east of the belt press. Camera looking south.			



Inflow pipes			RIMG3207.JPG
09/19/2023 09:01 AM	No CBI	No PII	Photographer: Andi Hodaj
Headworks			[Geographic Coordinates]
Inflow and return pipes at the headworks of the Wheelersburg WWTP. The bigger pipe that is seen discharging in the photo, is the one from the city of Wheelersburg. Camera looking north.			



Trash bar screen			RIMG3208.JPG
09/19/2023 09:02 AM	No CBI	No PII	Photographer: Andi Hodaj
Headworks			[Geographic Coordinates]
Trash bar screen at the headworks of the Wheelersburg WWTP. Camera looking south.			



Spiral Screw Screen			RIMG3209.JPG
09/19/2023 09:02 AM	No CBI	No PII	Photographer: Andi Hodaj
Headworks			[Geographic Coordinates]
A spiral screw mechanical screen at the headworks that removes coarse trash coming into the wastewater treatment plant. Camera looking north.			



Unused sludge drying beds			RIMG3230.JPG
09/19/2023 09:04 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71907666, -82.86108499
Unused sludge drying beds south of the sludge storage shed. Camera looking north			



Autosampler at the Headworks			RIMG3210.JPG
09/19/2023 09:05 AM	No CBI	No PII	Photographer: Andi Hodaj
Headworks			
Autosampler at the headworks of the Wheelersburg WWTP. Inside the autosampler there is a bottle full of water.			



Unused sludge drying beds			RIMG3231.JPG
09/19/2023 09:06 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.719045, -82.86116833
Unused sludge drying beds south of the sludge storage shed. Camera looking north.			



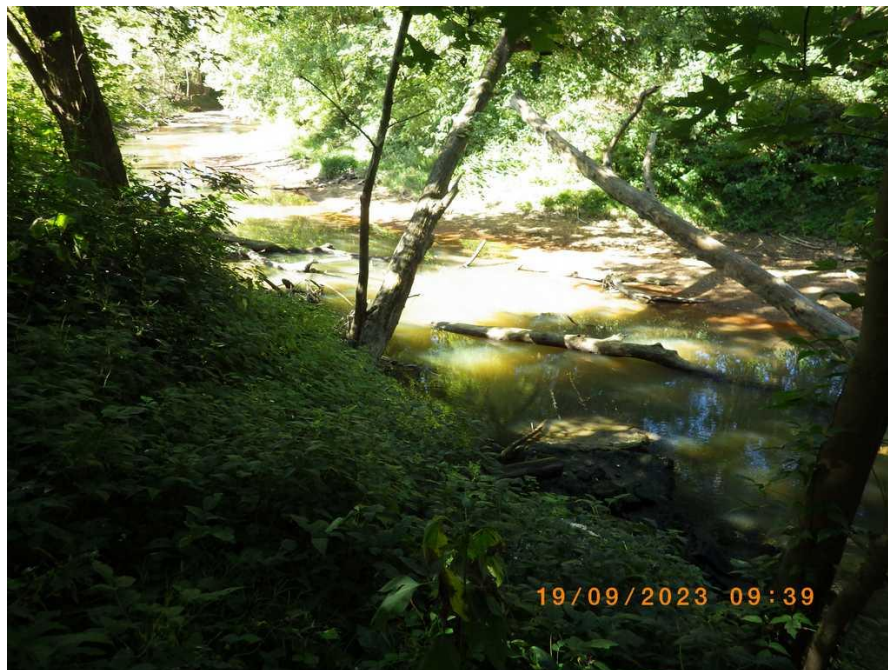
New sludge storage shed			RIMG3232.JPG
09/19/2023 09:07 AM	No CBI	No PII	Photographer: Andi Hodaj
Sludge handling area			38.71901833, -82.86072333
New sludge storage shed where sludge is mixed with woodchips and left to dry. Camera looking north.			



Outfall 001			RIMG3233.JPG
09/19/2023 09:38 AM	No CBI	No PII	Photographer: Andi Hodaj
Outfall 001			38.71829333, -82.86420333
Outfall 001 discharging into Pine Creek. Camera looking northwest.			



Outfall 001 signage			RIMG3234.JPG
09/19/2023 09:39 AM	No CBI	No PII	Photographer: Andi Hodaj
Outfall 001			38.71829333, -82.86420333
Outfall 001 signage on the banks of Pine Creek. Camera looking north.			



Receiving stream			RIMG3235.JPG
09/19/2023 09:39 AM	No CBI	No PII	Photographer: Andi Hodaj
Outfall 001			38.71824333, -82.86411
Pine Creek right downstream from outfall 001. Camera looking east.			



Sampling and reporting schedule

RIMG3236.JPG

09/19/2023 10:32 AM

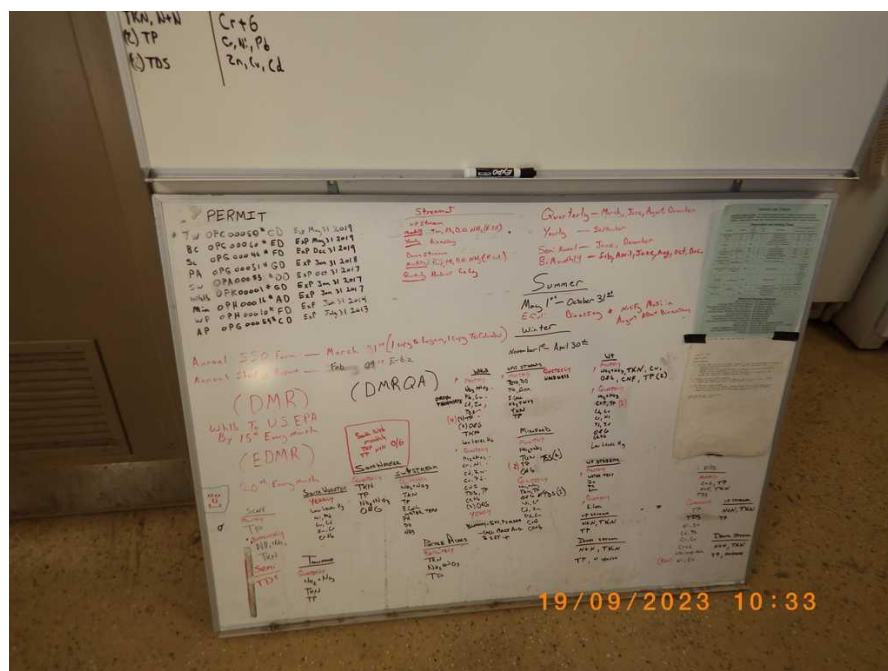
No CBI

No PII

Photographer: Andi Hodaj

Wheelersburg WWTP Laboratory

Sampling and reporting schedule board inside the lab.



Sampling and reporting schedule

RIMG3237.JPG

09/19/2023 10:33 AM

No CBI

No PII

Photographer: Andi Hodaj

Wheelersburg WWTP Laboratory

Sampling and reporting schedule board inside the lab.