

National Pollutant Discharge Elimination System (NPDES) Permit Program

F A C T S H E E T

Regarding an NPDES Permit To Discharge to Waters of the State of Ohio  
for Upper Sandusky

Public Notice No.: 13-07-031  
Public Notice Date: July 19, 2013  
Comment Period Ends: September 3, 2013

OEPA Permit No.: 2PD00039\*MD  
Application No.: OH0020001

Name and Address of Applicant:  
City of Upper Sandusky  
119 North Seventh Street  
Upper Sandusky, OH 43351

Name and Address of Facility Where  
Discharge Occurs:  
Upper Sandusky WWTP  
115 Indian Mill Road  
Upper Sandusky, OH 43351  
Wyandot County

Receiving Water: Sandusky River

**Introduction**

Development of a Fact Sheet for NPDES permits is mandated by Title 40 of the Code of Federal Regulations, Section 124.8 and 124.56. This document fulfills the requirements established in those regulations by providing the information necessary to inform the public of actions proposed by the Ohio Environmental Protection Agency, as well as the methods by which the public can participate in the process of finalizing those actions.

This Fact Sheet is prepared in order to document the technical basis and risk management decisions that are considered in the determination of water quality based NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, instream biological, chemical and physical conditions, and the relative risk of alternative effluent limitations. This Fact Sheet details the discretionary decision-making process empowered to the Director by the Clean Water Act and Ohio Water Pollution Control Law (ORC 6111). Decisions to award variances to Water Quality Standards or promulgated effluent guidelines for economic or technological reasons will also be justified in the Fact Sheet where necessary.

In accordance with the antidegradation rule, OAC 3745-1-05, the Director has determined that a lowering of water quality in Lake Erie is necessary. Provision (D)(1)(g) was applied to this application. This provision excludes the need for the submittal and subsequent review of technical alternatives and social and economic issues related to the degradation. Other rule provisions, however, including public participation and appropriate intergovernmental coordination were required and considered prior to reaching this decision.

## **Procedures for Participation in the Formulation of Final Determinations**

The proposed modification is tentative but shall become final on the effective date unless (1) an adjudication hearing is requested, (2) the Director withdraws and revises the proposed modification after consideration of the record of a public meeting or written comments, or (3) upon disapproval by the Administrator of the U.S. Environmental Protection Agency.

Within forty-five (45) days of publication of this notice, any person may submit written comments, a statement as to why the proposed modification should be changed, a request for a public meeting on the proposed modification and/or a request for notice of further actions concerning the modification. All communications timely received will be considered in the final formulation of the modification. If significant public interest is shown a public meeting will be held prior to finalization of the modification.

Within thirty (30) days of the issuance of the proposed modification any officer of an agency of the state or of a political subdivision, acting in his representative capacity or any person aggrieved or adversely affected by issuance of it may request an adjudication hearing by submitting a written objection in accordance with Ohio Revised Code Section 3745.07. Since all other conditions of the permit remain in effect, a hearing may not be requested on any issues other than the proposed modification. If an adjudication hearing is requested, the existing NPDES permit will remain in effect until the hearing is resolved. Following the finalization of the modification by the Director, any person who was a party to an adjudication hearing may appeal to the Environmental Review Appeals Commission.

Requests for public meetings shall be in writing and shall state the action of the Director objected to, the questions to be considered, and the reasons the action is contested. Such requests should be addressed to:

**Legal Records Section  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049**

Interested persons are invited to submit written comments upon the proposed modification. Comments should be submitted in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

**Ohio Environmental Protection Agency  
Attention: Division of Surface Water  
Permits and Compliance Section  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049**

The OEPA permit number and Public Notice numbers should appear on each page of any submitted comments. All comments received no later than 30 days after the date of the Public Notice will be considered.

Citizens may conduct file reviews regarding specific companies or sites. Appointments are necessary to conduct file reviews, because requests to review files have increased dramatically in

recent years. The first 250 pages copied are free. For requests to copy more than 250 pages, there is a five-cent charge for each page copied. Payment is required by check or money order, made payable to Treasurer State of Ohio.

### **Location of Discharge/Receiving Water Use Classification**

Upper Sandusky discharges to the Sandusky River at River Mile (RM) 80.02. The approximate location of the facility is shown in Figure 1.

This segment of the Sandusky River is described by Ohio EPA River Code: 05-001, U.S. EPA River Reach #: 04100011-040, County: Wyandot, Ecoregion: Eastern Corn Belt Plains. The Sandusky River is designated for the following uses under Ohio's Water Quality Standards (OAC 3745-1-12): Warmwater Habitat (WWH), Agricultural Water Supply (AWS), Industrial Water Supply (IWS), and Class A Primary Contact Recreation (PCR).

Use designations define the goals and expectations of a waterbody. These goals are set for aquatic life protection, recreation use and water supply use, and are defined in the Ohio WQS (OAC 3745-1-07). The use designations for individual waterbodies are listed in rules -08 through -32 of the Ohio WQS. Once the goals are set, numeric water quality standards are developed to protect these uses. Different uses have different water quality criteria.

Use designations for aquatic life protection include habitats for coldwater fish and macroinvertebrates, warmwater aquatic life and waters with exceptional communities of warmwater organisms. These uses all meet the goals of the federal Clean Water Act. Ohio WQS also include aquatic life use designations for waterbodies which can not meet the Clean Water Act goals because of human-caused conditions that can not be remedied without causing fundamental changes to land use and widespread economic impact. The dredging and clearing of some small streams to support agricultural or urban drainage is the most common of these conditions. These streams are given Modified Warmwater or Limited Resource Water designations.

Recreation uses are defined by the depth of the waterbody and the potential for wading or swimming. Uses are defined for bathing waters, swimming/canoeing (Primary Contact) and wading only (Secondary Contact - generally waters too shallow for swimming or canoeing).

Water supply uses are defined by the actual or potential use of the waterbody. Public Water Supply designations apply near existing water intakes so that waters are safe to drink with standard treatment. Most other waters are designated for agricultural and industrial water supply.

### **Facility Description**

The Upper Sandusky wastewater plant is an advanced treatment facility with an average daily design flow of 2.0 million gallons per day (MGD). Wet stream processes include influent pumping, bar screens, aerated grit removal, conventional activated sludge aeration, phosphorus removal by chemical addition, secondary clarification and ultra violet disinfection. Solid stream processes are primary and secondary aerobic digestion, dewatering using drying beds and sludge disposal at a landfill.

Upper Sandusky has a collection system that is approximately 60 percent combined sewers and 40 percent separate sanitary sewers. Historically, the City has eliminated several known CSOs

(combined sewer overflows) from its collection system, but several new CSOs have recently been discovered in the system. There is also an active raw sewage bypass at the wastewater plant.

### **Basis of the Modification**

Upper Sandusky has applied for a modification to the NPDES permit to include eight combined sewer overflow (CSO) outfall stations. These CSO outfall locations have been included in Part 1, B as Stations 053 through 059. Table 1 includes the location of the CSO outfalls (Stations 053-059) and the corresponding upstream regulator locations. Figure 2 shows CSO stations approximate location within the City. Table 3 shows an example of the table and monitoring requirements included in the NPDES permit.

A new CSO Long Term Control Plan Schedule has been included in Part I, C. - Schedule of Compliance Item 2. Within the scope of this new Schedule, the City of Upper Sandusky will develop a public notification plan with one month of the proposed effective date of the permit, install CSO flow monitoring devices within three months of the proposed effective date, complete and submit a CSO Long Term Control Plan Update no later than August 1, 2013, and eliminate the plant bypass (Station 051) by August 1, 2020.

Ohio EPA has reviewed the modification application and has determined that it meets the requirements of the Ohio Administrative Code. As a result, Ohio EPA is proposing a modification to the NPDES permit.

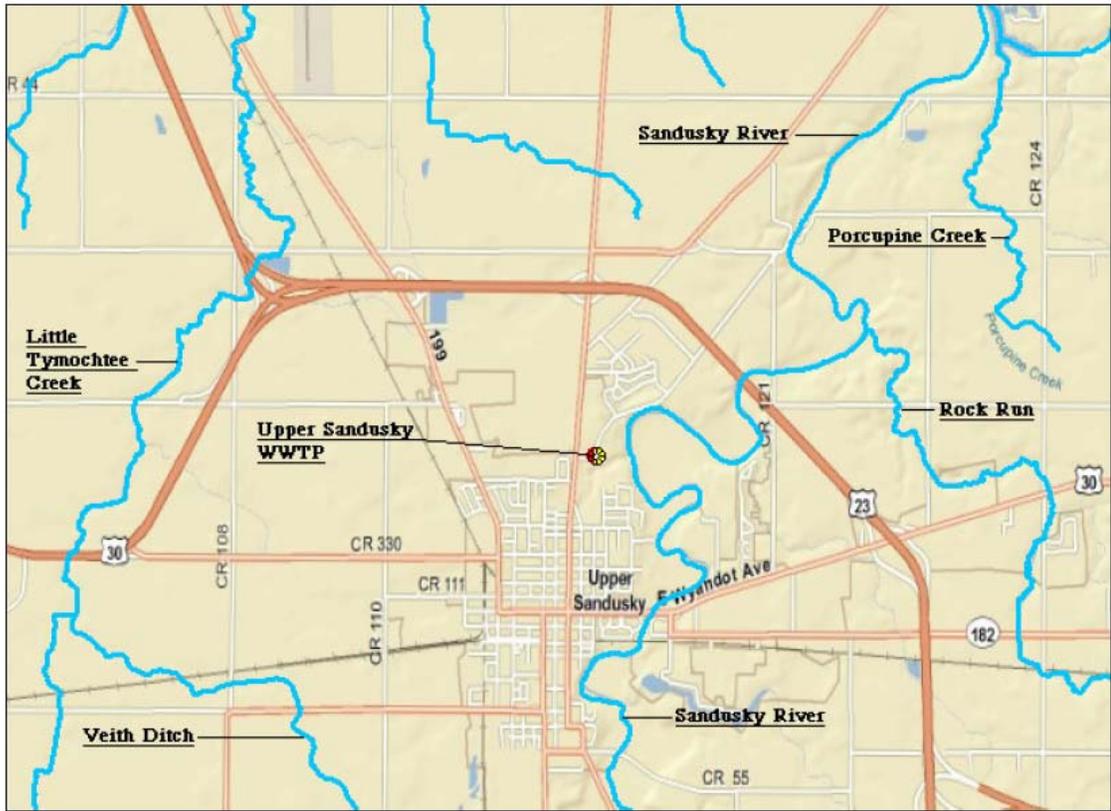


Figure 1. Approximate location of the Upper Sandusky Wastewater Treatment Plant

Table 1. Upper Sandusky CSO Outfall and Upstream Regulator Locations

City of Upper Sandusky Permitted CSO Information August, 2013		
Outfall	Latitude	Longitude
2PD000390052	40°N50'23.9"	83°W16'42.5"
Upstream Regulators		
1429, Weir	40°N50'21.0"	83°W16'43.6"
1425, Weir	40°N50'23.9"	83°W16'42.8"
2PD000390053	40°N50'20.4"	83°W16'43.1"
Upstream Regulators		
5860, Weir	40°N49'44.0"	83°W16'41.6"
5818, Weir	40°N50'03.1"	83°W16'36.0"
1451, Relief Sewer	40°N50'07.8"	83°W16'37.5"
2PD000390054	40°N50'17.3"	83°W16'47.3"
Upstream Regulators		
1472, Relief Sewer	40°N50'10.3"	83°W17'13.6"
1330, Weir	40°N50'12.9"	83°W16'58.3"
1333, Weir	40°N50'14.4"	83°W16'58.3"
1466, Relief Sewer	40°N50'18.3"	83°W17'27.6"
2PD000390055	40°N49'39.9"	83°W16'15.2"
Upstream Regulators		
5934, Relief Sewer	40°N49'38.9"	83°W16'41.7"
2PD000390056	40°N49'25.4"	83°W16'33.8"
Upstream Regulators		
5963, Weir	40°N49'28.7"	83°W16'41.5"
2PD000390057	40°N49'24.2"	83°W16'39.0"
Upstream Regulators		
1117, Weir	40°N49'24.2"	83°W16'52.9"
2PD000390058	40°N49'11.1"	83°W16'46.5"
Upstream Regulators		
1525, Relief Sewer	40°N49'09.9"	83°W16'52.7"
2PD000390059	40°N48'51.3"	83°W16'31.2"
Upstream Regulators		
6082, Relief Sewer	40°N48'53.7"	83°W16'42.4"



Figure 2. Approximate location of the Upper Sandusky CSO Stations

Figure 2. Example CSO Station Table included in Upper Sandusky NPDES permit

Part I, B. - CSO MONITORING LIMITATIONS AND MONITORING REQUIREMENTS

1. CSO Monitoring. During the period beginning on 0 and lasting until 60 , the permittee shall monitor at Station Number 2PD00039053 , and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sludge sampling.

Table - CSO Monitoring - 053 - Final

Effluent Characteristic  Parameter	Discharge Limitations						Monitoring Requirements			
	Concentration Specified Units		Loading* kg/day				Measuring Frequency	Sampling Type	Monitoring Months	
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly				Monthly
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
74062 - Overflow Occurrence - No./Month	-	-	-	-	-	-	-	When Disch.	Total	All
74063 - Overflow Volume - Million Gallons	-	-	-	-	-	-	-	When Disch.	Total	All
80082 - CBOD 5 day - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All

NOTES for Station Number 2PD00039053:

- Subject to the terms and conditions of this permit, including the General Effluent Limitations in Part III, Item 2, the permittee is authorized to discharge from this station only during wet weather periods when the flow in the sewer system exceeds the capacity of the sewer system.
- A Discharge Monitoring Report, or DMR (Form 4500) for this station must be submitted every month. See Part II, Items D, E, and F for requirements on monitoring different CSO stations. If there are no discharges during the entire month:
  - 1) eDMR users should select the "No Discharge" check box on the data entry form. PIN the eDMR.
  - 2) Permittees reporting on paper should report "AL" in the first column of the first day of the month on the 4500 Form. Sign the form.
- Data for Overflow Occurrence and Overflow Volume may be estimated if a measuring device is not available.
- Overflow Occurrences: If an overflow from regulators 1451, 5818 or 5860 (upstream of Station 053) occurs intermittently during a day, starting and stopping several times, count "1" occurrence for that day. If an overflow from these regulators occurs on more than one day but is the result of a continuing precipitation event, it should be counted as one occurrence. Report total occurrences for the month on Day 1 of the DMR.
- Overflow Volume shall be reported on each day there is an overflow at regulators 1451, 5818 or 5860 (upstream of Station 053). The summation of the Overflow Volume at each regulator shall be reported for Station 053 Overflow Volume. Data for total suspended solids and CBOD5 shall be reported once per month and shall be collected at the regulator.