



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Notice of Violation
Putnam County
Ottawa WWTP
CSI Inspection

April 12, 2011

Mr. Jack Williams
Municipal Director
Village of Ottawa
136 North Oak Street
Ottawa, Ohio 45875

Dear Mr. Williams:

On April 4, 2011, I conducted a compliance sampling inspection at the Village of Ottawa Wastewater Treatment Plant (WWTP). Mr. Doug Schroeder, WWTP Superintendent, and Mr. Jason Phillips, Water Director, were present and provided information on operations and maintenance at the plant.

At the time of inspection, all required treatment processes and associated equipment were in operation and the discharge to the Blanchard River was clear, colorless, and had no noticeable odor. It was noted that the new UV disinfection system has sent out to bid and has a projected completion date for September of this year. The temporary chlorine/dechlorination system is once again going to be used for disinfection until the UV installation is complete.

A review of the discharge monitoring reports (DMR) for January 2011 to March 2011 shows that there have been several NPDES permit effluent limit violations. The specific instances of noncompliance are attached on a separate sheet. Further review of your self-monitoring reports for the previous six months, ending in March 2011, indicates that you are in significant non-compliance (SNC) with an effluent limitation contained in your NPDES permit. The specific instance of SNC is attached on a separate sheet. It is noted that letters in response to the violations have been submitted by Doug Schroeder. It is also noted that the Village is continuing to implement the Mercury variance pollutant minimization program (PMP) to try to eliminate/reduce mercury in the collection system.

Samples of the effluent were collected the day of the inspection and the results will be forwarded upon receipt. If you have any questions please, contact me at (419) 373-3053.

Sincerely,

Ryan Gierhart
Division of Surface Water

/cs

Enclosures

pc/w encl.:

Mr. Doug Schroeder, Plant Superintendent
DSW: NWDO-File

Get New Data

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PD00028*KD	January 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.1	61.9	1/1/2011
2PD00028*KD	January 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.00013	1/1/2011

Get New
Data

Get Detail
for Selected
Permit

Facilities in Significant Non-Compliance **

Period: Oct-10 Mar-11

County	Permit #	Facility Name	Major	Station Code	Param Code	Parameter Name	Max Exceed	# Months Signif. Exceed (1)	# Months Exceed (2)
Putnam	2PD00028	Ottawa WWTP	M	1	50092	Mercury, Total (Low Level)	771.8	2	2

State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PD00028	OH002692	4/4/2011	C	S	1

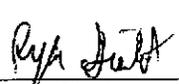
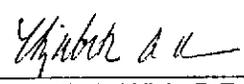
Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Ottawa WWTP 1371 N. Defiance Street Ottawa OH 45875	10:00 am	7/1/2009
	Exit Time	Permit Expiration Date
	1:00 pm	8/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Doug Schroeder, Wastewater Director Jason Phillips, Water Director	(419) 523-0020	
Name, Address and Title of Responsible Official	Phone Number	
Jack Williams Municipal Director Village of Ottawa 136 North Oak Street Ottawa, Ohio 45875	(419) 335 - 9871	

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	N	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

Inspector	Reviewer
 Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office	 Elizabeth A. Wick, P.E. Water Quality Engineer Division of Surface Water Northwest District Office
4-11-11 Date	4/6/11 Date

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES permit
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Facility is in SNC for Mercury. Village continues to work on mercury variance PMP. Permittee has compliance schedule for a bypass alternative analysis.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available....generator or dual feed Y
 - i. What does the back-up power source operate.....

Generator can run the entire plant.
 - ii. How often is the generator tested under load.....

The generator is tested weekly under load.

(b) Which components have an alarm system available for power or equipment failures.....

All major treatment components have alarms.

- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... N/A
- (e) Any major equipment breakdown since last inspection..... Y
- (f) Operation and maintenance manual provided and maintained.... Y
- (g) Any plant bypasses since last inspection..... Y
- (h) Any plant upsets since last inspection..... N

Section G: Operation & Maintenance cont

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... Y
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hardbound books

- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - iii. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... Y
 - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental

agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

Plant had a bypass from the EQ basin on March 3, 2011.

Section G: Operation & Maintenance cont

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....19
 - ii. How many pump stations have telemetered alarms.....2
 - iii. How many pump stations have operable alarms.....19
- (b) Any chronic collection system overflows since last inspection..... N/A
- (c) Regulatory agency notified of all overflows..... N/A
- (d) CSOs in the collection system...if so, what is the LCTP status..... N
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... N
- (g) RDII Program established and active..... N
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... N
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

Comments/Status:

Section H: Sludge Management

- (a) Method of Sludge Disposal...
 - Land Application
 - Haul to Another NPDES Permittee
 - Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

(b) Has amount of sludge generated changed significantly since the

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 - Land Injection	Option 10 - Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

last inspection..... N

(c) How much sludge storage is provided at the plant.....

849 days

(d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y

(e) Any complaints received in last year regarding sludge..... N

(f) 5/8" screen at headworks for facilities that land apply sludge..... N

(g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

Comments/Status:

Facility applies sludge and verifies isolation distances are maintained.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

Ultrasonic and Weir

- (b) Flow meter calibrated annually N
(Date of last calibration:)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
(see GLC page)
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable:
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to

produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, O&G, Nitrate + Nitrite, Phosphorus, Cyanide.

Lab name: Alloway

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
Date: 8/2010
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

The Flow meter is calibrated by comparing ultrasonic flows to flow through weir with depth markings. The flow meter is not calibrated annually by the manufacturer.

Section J: Effluent/Receiving Water Observations

Outfall # 2PD00028001

Outfall Description: Outfall observed was clear, colorless with no noticeable odor

Receiving Stream: Blanchard River

Receiving Stream Description: Stream appeared turbid with steady flow.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N

