Ohio | Environmental Protection Agency

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

Re: Sandusky County
Lindsey WWTP
NPDES permit

June 13, 2011

Mayor and Council
Village of Lindsey
240 South Main Street
P. O. Box 364
Lindsey, Ohio 43442

Dear Mayor and Council:

On April 20, 2011, Mary Beth Cohen and Alex Smaili conducted a compliance inspection of the wastewater treatment plant (WWTP) which serves the Village of Lindsey. Mr. Rod Opelt, Mayor and Mr. Jim Lipstraw, Village Maintenance were present. Additionally Mr. Tom Fry, operator of this facility, Mr. Steve Shiets, Mr. Clay Schwochow, and Zach Mulder (intern), were present from the Sandusky County Sanitary Engineer's office. Observations and recommendations noted during the inspection are as follows:

1. The surge tank was in use at the time of inspection, as very high flows were being received at the plant due to wet weather.

2. The aeration was turned off at the time of the inspection, in an effort to prevent washout and retain solids in the plant.

3. It was indicated that the replacement of the pinch valves with manual ball valves has resulted in better control of plant operations.

4. The two west beds of the four surface sand filters were in use and full to the top of the walls. The southeast filter was also in use and the northwest filter bed was clean and ready for use. Flows were elevated due to recent heavy rains, resulting in higher than usual operating levels and signs of sand filter overflows.

5. It was indicated that the filter sand is scheduled to be replaced in all four the beds this year.

6. The surge tank bypass was active at the time of inspection. This bypass after the surge tank diverts excess flows around the aeration/clarification tanks, directly to the dosing tanks then to the surface sand filters and disinfection.

7. The DMR reports include two dates in February 2011 (along with others), where the bypass after the surge tank to sandfilters and UV disinfection (602) flows exceed final effluent (001) flows as follows:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

Date	2/18/2011	2/28/2011
602	0.576 mgd	1.053 mgd
001	0.211 mgd	0.657 mgd
Difference	0.365 mgd	0.396 mgd

It is noted that Northwest Ohio experienced heavy rains and rapid snow melt on 02/28/11. For this day, it would appear that 396,000 gallons were unaccountable and/or overflowed the surface sand filters. The overflowing of the sand filters to the ground represents a "bypass" of partially treated wastewater. The overflow of the filters should be reported as an unpermitted overflow event, to the spill hotline 800-282-9378.

8. It was indicated that the 2010 census reported 446 residents in the Village of Lindsey. At an average daily flow of 100 gpd/person, flows to the plant should average 44,600 gpd. With the high flows (see #3 above) and the WWTP design of 0.215 MGD, this facility is still receiving excessive wet weather flows.

9. Contrary to the exceptionally high flows, extremely low flows have also been reported (less than 10,000 gpd). This would appear to be a loss of wastewater during dry weather possibly due to leaky sanitary sewers, in addition to the Inflow and infiltration (I/I) of storm water during wet weather.

10. The Inflow and infiltration (I/I) flows were to have been addressed as per the NPDES permit Part I. C – Schedule of Compliance (copy enclosed). As of this time, compliance schedule items which were to have been submitted, have not yet been received, other than an annual summary. (Also see below)

11. It was indicated that the pumps in the lift station to the sludge drying beds no longer work. Portable submersible pumps are used instead.

12. The south side of the two sludge drying beds had a very large accumulation of stockpiled dried sludge, while the north bed had only a small amount. Due to the accumulation and stockpile of dried sludge, there is very limited to no available use of the sludge drying beds. The sludge should be disposed of properly, as soon as possible. Please contact Andrew Gall of this office (419-373-3003), with any questions regarding the disposal of sludge.

13. It was indicated that the main lift station into the plant was last "observed" to overflow in 2007. It is noted that there is no physical method, other than that of an operator's visual observation while at the lift station during an overflow, to substantiate the frequency of overflows at this location. As per NPDES permit Part I. C – Schedule of Compliance, Item 2. *Municipal Separate Sewer Sanitary Sewer Compliance Schedule*, this overflow was to have been eliminated.

NPDES Permit Compliance Schedule

The NPDES permit for this facility includes the following compliance schedule items which were to have been submitted but have not yet been received:

> 04/01/2008 - *Inflow and infiltration (I/I) Reduction Plan*, to include a fixed date schedule for completing the recommendations (with list of specified items included). The plan was to include a schedule of work necessary for the reduction of I/I into the collection system necessary to reduce peak wet weather flows, to be completed in 5 years (04/01/2012)
>
> 06/01/2007 – Eliminate all separate sewer (pump station) overflows.

The I/I Reduction Plan was to have been submitted on April 1, 2008. Prior to renewal of the current NPDES permit (as required in prior permit) a letter was received (03/28/2006) that indicated that Village Council had hired Feller, Finch & Associates, to work with the Village on a longer term basis to solve the I/I problems. This was followed by a call from Feller, Finch & Associates, indicating that they had been hired to work with the Village on the I/I study. To date, the requirements of the NPDES permit Schedule of Compliance, have not been completed.

On 04/20/2011, Mr. Opelt forwarded a copy of a 2010 report which had been submitted to TMACOG. This report included a brief summary of recently completed and proposed work, including improvements to leaky storm sewers. There is no mention of improvements to the sanitary sewers.

Our records indicate that the sanitary sewers were originally installed in 1940, consisting of vitrified clay pipe and brick manholes. In an effort to reduce extraneous flows, the collection system was grouted in 1995. It was indicated that after about 5 years, loose grout was observed at the WWTP.

As evident by the high flows and unaccounted for discharge flows (overflowing sand filters) noted above, efforts are still needed to address the I/I received at this facility. These efforts should be focused on the sanitary sewers. **At this time, please advise as to the submittal of the required items listed in the NPDES Schedule of Compliance (copy enclosed). This should be submitted in writing, as soon as possible, but no later than July 30, 2011.**

Failure to comply with the NPDES permit and properly operate and maintain the WWTP can be cause for escalated enforcement action that may include penalties. If progress is not made, we will have no choice but to recommend that the director pursue enforcement action.

Operator Log Requirements

Required record keeping and documentation at the facility must be implemented immediately. A log book must be developed to keep an up-to-date record for wastewater system operations and maintenance, which contains at a minimum, the following information:

- Identification of the sewerage system, or treatment works;
- dates and times of arrival and departure for the operator of record;
- specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage received and/or effluent produced;
- results of tests performed and samples taken, unless documented on a laboratory bench sheet;
- performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced;
- and identification of the persons making entries.

The records must be kept up to date, contain a minimum of three months' data at all times, and be maintained on site for at least three years.

OAC Chapter 3745-7-09: Operator Certification for Public Water Systems and Wastewater Treatment Works (copy enclosed) is available at: http://www.epa.state.oh.us/ddagw/rules.aspx.

E-DMR – NOV

A review of your discharge monitoring reports (DMRs) has been conducted. A list of permit violations (04/2007 thru 04/2011) is enclosed.

Please contact Mary Beth Cohen at this office (419-373-3014) as soon as possible to schedule a meeting regarding the above referenced compliance issues.

Yours truly,

Elizabeth A. Wick, P.E.
District Engineer/Unit Supervisor
Division of Surface Water

MBC/cs
Enclosure
pc: Sandusky County Sanitary Engineers Office
NWDO - DSW File

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
31616 - Fecal Coliform - #/100 ml	-	-	2000	1000	-	-	-	1/Week	Grab	Summer
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Continuous	All
50092 - Mercury, Total (Low Level) - ng/l	-	-	-	-	-	-	-	1/Year	Grab	Yearly
80082 - CBOD 5 day - mg/l	-	-	40	25	-	33	20	1/Week	Composite	Winter
80082 - CBOD 5 day - mg/l	-	-	15	10	-	12	8	1/Week	Composite	Summer

Notes for station 2PA00024001:
* Effluent loadings based on average design flow of 0.215 MGD.

See Part I, C. Schedule of Compliance.

Mercury - See Part II, Item Q.

Part I, B. - SSO MONITORING EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. SSO Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor at Station Number 2PA00024300 , and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - SSO Monitoring - 300 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
74062 - Overflow Occurrence - No./Month	-	-	-	-	-	-	-	When Disch.	Total	All

NOTES for Station Number 2PA00024300:

- A sanitary sewer overflow is an overflow, spill, release, or diversion of wastewater from a sanitary sewer system. These overflows shall be monitored when they discharge.

- For the purpose of counting occurrences, each location on the sanitary sewer system where there is an overflow, spill, release, or diversion of wastewater on a given day that enters waters of the state is counted as one occurrence. For example, if on a given day overflows occur from a manhole at one location and from a damaged pipe at another location and they both enter waters of the state, record two occurrences for that day. If overflows from both locations continue on the following day, record two occurrences for the following day. At the end of the month, total the daily occurrences and report this number in the first column of the first day of the month on the 4500 form. If there are no overflows during the entire month, report "zero" (0).

- All sanitary sewer overflows are prohibited except under emergency conditions where the overflow occurs in full compliance with all of the provisions of 40 CFR 122.41(m) and Part III Item 11 of this NPDES permit.
See Part II, Items E and F.

Part I, B. - SLUDGE MONITORING REQUIREMENTS

1. Sludge Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' final sludge at Station Number 2PA00024581, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sludge sampling.

Table - Sludge Monitoring - 581 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00611 - Ammonia (NH3) In Sludge - mg/kg	-	-	-	-	-	-	-	1/Year	Composite	December
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg	-	-	-	-	-	-	-	1/Year	Composite	December
01003 - Arsenic, Total In Sludge - mg/kg	75	-	-	-	-	-	-	1/Year	Composite	December
01028 - Cadmium, Total In Sludge - mg/kg	85	-	-	-	-	-	-	1/Year	Composite	December
01043 - Copper, Total In Sludge - mg/kg	4300	-	-	-	-	-	-	1/Year	Composite	December
01052 - Lead, Total In Sludge - mg/kg	840	-	-	-	-	-	-	1/Year	Composite	December
01068 - Nickel, Total In Sludge - mg/kg	420	-	-	-	-	-	-	1/Year	Composite	December
01093 - Zinc, Total In Sludge - mg/kg	7500	-	-	-	-	-	-	1/Year	Composite	December
01148 - Selenium, Total In Sludge - mg/kg	100	-	-	-	-	-	-	1/Year	Composite	December
31641 - Fecal Coliform in Sludge - MPN/G	2000000	-	-	-	-	-	-	1/Year	Composite	December
51129 - Sludge Fee Weight - dry tons	-	-	-	-	-	-	-	1/Year	Total	December
70316 - Sludge Weight - Dry Tons	-	-	-	-	-	-	-	1/Year	Total	December
71921 - Mercury, Total In Sludge - mg/kg	57	-	-	-	-	-	-	1/Year	Composite	December
78465 - Molybdenum In Sludge - mg/kg	75	-	-	-	-	-	-	1/Year	Composite	December

NOTES for Station Number 2PA00024581:
* Monitoring is required when sludge is removed from the Permittee's wastewater treatment facility for disposal by land application. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed during the entire reporting period, report "AL" in the first column of the first day of December on the 4500 Form (Monthly Operating Report). A signature is still required.
**Monitoring for fecal coliform is required for Class B pathogen reduction alternative 1. Seven separate composite samples of the sewage sludge, said samples recommended to be taken at two day intervals shall be submitted for analysis using the most probable number (MPN/G, MOR Code 31641) method. The number to be submitted on the MOR is the calculated geometric mean of the seven representative samples.

*** Units of mg/kg are on a dry weight basis.
**** Sludge weight is a calculated total for the sampling period.
See Part II, Items K, L, M, N, O, and P.

Part I, B. - SLUDGE MONITORING REQUIREMENTS

1. Sludge Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' final sludge at Station Number 2PA00024586, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sludge sampling.

Table - Sludge Monitoring - 586 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
51129 - Sludge Fee Weight - dry tons	-	-	-	-	-	-	-	1/Year	Total	December

NOTES for Station Number 2PA00024586:
* Monitoring is required when sludge is removed from the Permittee's wastewater treatment facility for disposal in a mixed solid waste landfill. Monthly Operating Report (MOR) data shall be submitted in December. If no sewage sludge is removed during the reporting period, report "AL" in the first column of the first day of December on the 4500 Form (Monthly Operating Report). A signature is still required.
** Units of mg/kg are on a dry weight basis.
*** Sludge weight is a calculated total for the sampling period.
See Part II, Items K, L, M, N, O, and P.

Part I, B. - SLUDGE MONITORING REQUIREMENTS

1. Sludge Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' final sludge at Station Number 2PA00024588, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sludge sampling.

Table - Sludge Monitoring - 588 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
70316 - Sludge Weight - Dry Tons	-	-	-	-	-	-	-	1/Year	Total	December
80991 - Sludge Volume, Gallons - Gals	-	-	-	-	-	-	-	1/Year	Total	December

NOTES for Station Number 2PA00024588:
* Monitoring is required when sewage sludge is removed from the permittee's facility for transfer to a publicly owned treatment works. Monthly Operating Report (MOR) data shall be submitted in December. The total for the entire calendar year shall be reported in the data area for the first day of December. If no sewage sludge is removed from the permittee's facility during the calendar year, report "AL" in the first column of the first day in December on the 4500 Form. A signature is still required.
** Units of mg/kg are on a dry weight basis.
*** Sludge weight is a calculated total for the sampling period.
See Part II, Item K, L, M, N, O, and P.

Part I, B. - INFLUENT MONITORING REQUIREMENTS

1. Influent Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' influent wastewater at Station Number 2PA00024601, and report to the Ohio EPA in accordance with the following table. Samples of influent used for determination of net values or percent removal must be taken the same day as those samples of effluent used for that determination. See Part II, OTHER REQUIREMENTS, for location of influent sampling.

Table - Influent Monitoring - 601 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	1/Week	Composite	All
80082 - CBOD 5 day - mg/l	-	-	-	-	-	-	-	1/Week	Composite	All

NOTES for Station Number 2PA00024601:

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

1. Bypass Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment plant's bypass when discharging, at Station Number 2PA00024602, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

See Part II, Item K.

Table - Bypass Monitoring - 602 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	When Disch.	Continuous	All
80082 - CBOD 5 day - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
80998 - Bypass Occurrence, Number per month - No./Month	-	-	-	-	-	-	-	When Disch.	Continuous	All
80999 - Bypass Duration, Hours per month - Hr/Month	-	-	-	-	-	-	-	When Disch.	Continuous	All

NOTES for Station Number 2PA00024602:

- A Monthly Operating Report (Form 4500) for this station must be submitted every month.
- Total suspended solids, flow rate, and CBOD shall be monitored and reported on each day when a discharge occurs through this station.
- Bypass occurrence - The total number for the month shall be reported.
- Bypass duration - The total hours per month shall be reported.

If there are no discharges during the entire month:
1) Report "AL" in the first column of the first day of the month on the 4500 Form.
2) Sign the form.

- Treatment plant bypass is prohibited except under emergency conditions as authorized by federal regulation at 40 CFR 122.41(m) and Part III, Item 11, General Conditions, of this permit.

Part I, B. - UPSTREAM MONITORING REQUIREMENTS

1. Upstream Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the receiving stream, upstream of the point of discharge at Station Number 2PA00024801, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - Upstream Monitoring - 801 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Month	Grab	All
00300 - Dissolved Oxygen - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	-	-	-	-	-	-	-	1/Month	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Quarter	Grab	Quarterly
31616 - Fecal Coliform - #/100 ml	-	-	-	-	-	-	-	1/Quarter	Grab	Summer-Qtrly

NOTES for Station Number 2PA00024801:

Part I, B. - DOWNSTREAM-NEARFIELD MONITORING REQUIREMENTS

1. Downstream-Nearfield Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the receiving stream, downstream of the point of discharge, at Station Number 2PA00024901, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - Downstream-Nearfield Monitoring - 901 - Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day					
Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly	Measuring Frequency	Sampling Type	Monitoring Months
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Month	Grab	All
00300 - Dissolved Oxygen - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	-	-	-	-	-	-	-	1/Month	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Quarter	Grab	Quarterly
31616 - Fecal Coliform - #/100 ml	-	-	-	-	-	-	-	1/Quarter	Grab	Summer-Qtrly

NOTES for Station Number 2PA00024901:
See Part II, Item J.

Part I, C - Schedule of Compliance

Municipal Construction Schedule

1. Infiltration and Inflow Study Compliance Schedule

The entity shall take the actions described below as expeditiously as practicable, but not later than the dates developed in accordance with the following schedule:

A. The collection system receives excessive infiltration and inflow (I/I) which results in one or more of the following: collection system surcharging and overflows; hydraulic overloading of lift stations; sewage flows at the treatment plant that exceed the design peak flows and poor treatment plant performance. The permittee must take immediate steps to enact and enforce ordinances prohibiting discharge of clean water into the collection system and ensure that all new sewer construction meets Ohio EPA design standards. The permittee shall reduce the I/I, and achieve full compliance with all terms and conditions of the NPDES permit in accordance with the following schedule:

2. The permittee shall submit to the Northwest District Office for acceptance an I/I reduction plan. The I/I reduction plan submittal shall include a fixed date schedule for completing the recommendations. The I/I reduction plan shall be completed and submitted to Ohio EPA NWDO within 12 months from the effective date of this permit. The plan shall incude, at a minimum, the following items: (Event Code 21599)

a. A map indicating locations of all sanitary and storm sewers in the service area. Manholes and catch basins should be clearly marked.
b. A description of the existing sanitary sewer system.
c. A description of local geology and how it relates to I/I.
d. A detailed historical summary of all I/I work (investigation and removal) that has been done to date.
e. A plan for determining sources of excessive I/I including illegal connections. This should include flow and velocity monitoring at strategic points in the collection system.
f. An implementation schedule for future I/I work, including televising sewer lines, dye or smoke testing, individual home inspections for sump pump connections, etc.

3. The permittee shall fully implement all the recommendations of the I/I reduction plan to reduce the volume of I/I entering the collection system.

4. All work necessary for the reduction of I/I into the collection system necessary to reduce peak wet weather flows at the treatment plant shall be fully completed according to the implementation schedule set forth in the I/I Reduction Plan, not to exceed 5 years from the effective date of this permit. (Event Code 4599)

5. An annual report summarizing the results of the effort to reduce I/I into the collection system shall be submitted to the Ohio EPA NWDO no later than January 31, each year for the life of this permit.

2. Municipal Separate Sanitary Sewer Compliance Schedule

This entity shall take actions described below as soon as possible, but not later than the dates developed in accordance with the following schedule to eliminate all separate sewer overflows (unauthorized discharges):

A. Within 2 months of the effective date of this permit, The VIllage of Lindsey shall submit an update regarding the elimination of the pump station separate sanitary sewer overflow(s) (SSO). (Event Code 91099).

Part II, Other Requirements

A. The wastewater treatment works must be under supervision of a Class II State certified operator as required by rule 3745-7- 02 of the Ohio Administrative Code.

B. The plant must be staffed and operated in accordance with the Ohio EPA approved Operation and Maintenance Manual.

C. Description of the location of the required sampling stations are as follows:

Sampling Station	Description of location
2PA00024001	Final effluent (Lat: 41N 25' 19"; Long: 83W 12' 36")
2PA00024300	System wide sanitary sewer overflow occurences
2PA00024581	Sludge - Land Application
2PA00024586	Sludge hauled to Landfill
2PA00024588	Sludge hauled to another NPDES permit holder
2PA00024601	Influent
2PA00024602	Bypass after surge tank (to sandfilters and UV disinfection)
2PA00024801	Muddy Creek - Upstream
2PA00024901	Muddy Creek - Downstream

D. All parameters, except flow, need not be monitored on days when the plant is not normally staffed (Saturdays, Sundays, and Holidays). On those days, report "AN" on the monthly report form.

E. Sanitary Sewer Overflow (SSO) Reporting Requirements

A sanitary sewer overflow is an overflow, spill, release, or diversion of wastewater from a sanitary sewer system. SSOs do not include wet weather discharges from combined sewer overflows specifically listed in Part II of this NPDES permit (if any). All SSOs are prohibited except under emergency conditions where the overflow occurs in full compliance with all of the provisions of 40 CFR 122.41(m) and Part III Item 11 of this NPDES permit. Sanitary sewer overflows must be reported as required below.

1. Reporting for SSOs That Imminently and Substantially Endanger Human Health

a) Immediate Notification

You must notify Ohio EPA (1-800-282-9378) and the appropriate Board of Health (i.e., city or county) within one hour of learning of any SSO from your sewers or from your maintenance contract areas that may imminently and substantially endanger human health. The telephone report must identify the location, estimated volume and receiving water, if any, of the overflow. An SSO that may imminently and substantially endanger human health includes dry weather overflows, major line breaks, overflow events that result in fish kills or other significant harm, and overflow events that occur in sensitive waters and high exposure areas such as protection areas for public drinking water intakes and waters where primary contact recreation occurs.

b) Follow-Up Written Report

Within 5 days of the time you become aware of any SSO that may imminently and substantially endanger human health, you must provide the appropriate Ohio EPA district office a written report that includes:

(i) the estimated date and time when the overflow began and stopped or will be stopped (if known);
(ii) the location of the SSO including an identification number or designation if one exists;
(iii) the receiving water (if there is one);
(iv) an estimate of the volume of the SSO (if known);
(v) a description of the sewer system component from which the release occurred (e.g., manhole, constructed overflow pipe, crack in pipe);
(vi) the cause or suspected cause of the overflow;
(vii) steps taken or planned to reduce, eliminate, and prevent reoccurrence of the overflow and a schedule of major milestones for those steps; and
(viii) steps taken or planned to mitigate the impact(s) of the overflow and a schedule of major milestones for those steps.

A document showing the acceptable format for a 5-day follow up written report can be downloaded from the Ohio EPA Division of Surface Water Permits Program Technical Assistance web page at http://www.epa.state.oh.us/dsw/permits/technical_assistance.html

2. Reporting for All SSOs, Including Those That Imminently and Substantially Endanger Human Health

a) Monthly Operating Reports

Sanitary sewer overflows that enter waters of the state, either directly or through a storm sewer or other conveyance, shall be reported on your monthly operating reports. You must report the system-wide number of occurrences for SSOs that enter waters of the state in accordance with the requirements for station number 300. A monitoring table for this station is included in Part I, B of this NPDES permit. For the purpose of counting occurrences, each location on the sanitary sewer system where there is an overflow, spill, release, or diversion of wastewater on a given day is counted as one occurrence. For example, if on a given day overflows occur from a manhole at one location and from a damaged pipe at another location and they both enter waters of the state, you should record two occurrences for that day. If overflows from both locations continue on the following day, you should record two occurrences for the following day. At the end of the month, total the daily occurrences from all locations on your system and report this number using reporting code 74062 (Overflow Occurrence, No./Month) on the 4500 form for station number 300.

b) Annual Report

You must prepare an annual report of all SSOs in your collection system, including those that do not enter waters of the state. The annual report must be in an acceptable format (see below) and must include:

(i) A table that lists an identification number, a location description, and the receiving water (if any) for each existing SSO. If an SSO previously included in the list has been eliminated, this shall be noted. Assign each SSO location a unique identification by numbering them consecutively, beginning with 301.

(ii) A table that lists the date that an overflow occurred, the unique ID of the overflow, the name of affected receiving waters (if any), and the estimated volume of the overflow (in millions of gallons). The annual report may summarize information regarding overflows of less than approximately 1,000 gallons.

(iii) A table that summarizes the occurrence of water in basements (WIBs) by total number and by sewershed. The report shall include a narrative analysis of WIB patterns by location, frequency and cause.

Not later than March 31 of each year, beginning in 2005, you must submit two copies of the annual report for the previous calendar year to the appropriate Ohio EPA district office. You also must provide adequate notice to the public of the availability of the report.

Systems serving fewer than 10,000 people are not required to prepare an annual report if all monthly operating reports for the preceding calendar year show no discharge from overflows.

A document showing the acceptable format for an annual SSO report can be downloaded from the Ohio EPA Division of Surface Water Permits Program Technical Assistance web page at http://www.epa.state.oh.us/dsw/permits/technical_assistance.html .

F. 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.

G. Composite samples shall be comprised of at least three grab samples proportionate in volume to the sewage flow rate at the time of sampling and collected at intervals of at least 30 minutes, but not more than 2 hours, during the period that the plant is staffed on each day for sampling. Such samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's overall performance.

H. Grab samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's performance.

I. Final permit limitations based on preliminary or approved waste load allocations are subject to change based on modifications to or finalization of the allocation or report or changes to Water Quality Standards. Monitoring requirements and/or special conditions of this permit are subject to change based on regulatory or policy changes.

J. Sampling for these parameters at station 2PA00024001, 2PA00024601, 2PA00024801 and 2PA00024901 shall occur the same day.

K. All disposal, use, storage, or treatment of sewage sludge by the Permittee shall comply with Chapter 6111. of the Ohio Revised Code, Chapter 3745-40 of the Ohio Administrative Code, any further requirements specified in this NPDES permit, and any other actions of the Director that pertain to the disposal, use, storage, or treatment of sewage sludge by the Permittee.

L. Sewage sludge composite samples shall consist of six to twelve grab samples collected at such times and locations, and in such fashion, as to be representative of the facilities sewage sludge.

M. No later than January 31 of each calendar year the Permittee shall submit two (2) copies of a report summarizing the sewage sludge disposal, use, storage, or treatment activities of the Permittee during the previous calendar year. One copy of the report shall be sent to the Ohio EPA, Division of Surface Water, P.O. Box 1049, Columbus, Ohio 43216-1049, and one copy of the report shall be sent to the appropriate Ohio EPA District Office. The report shall be submitted on Ohio EPA Form 4229.

N. Each day when sewage sludge is removed from the wastewater treatment plant for use or disposal a representative composite sample of sewage sludge shall be collected and monitored for total solids. Results of the monitoring shall be used to calculate the total Sewage Sludge Weight (Monthly Operating Report code 70316) and total Sewage Sludge Fee Weight (Monthly Operating Report code 51129) for the reporting period specified by this NPDES permit. The results of the daily monitoring, and the weight calculations, shall be maintained on site for a minimum of five years. The test methodology used shall be Part 2540 G of Standard Methods for the Examination of Water and Wastewater, 18th Edition, 1992. To convert from gallons of liquid sewage sludge to dry tons of sewage sludge: dry tons = gallons x 8.34 (lbs/gallon) x 0.0005 (tons/lb) x decimal fraction total solids.

O. The Permittee may request authorization of land application sites in the following Ohio counties: Sandusky County

P. A grab sample of sewage sludge that has been treated to meet requirements for application to the land shall be monitored for dioxin, as the term dioxin is defined in rule 3745-40-01 of the Ohio Administrative Code, as per the monitoring frequency, methodologies and reporting requirements described in rule 3745-40-06 of the Ohio Administrative Code.

Q. The permitee shall use EPA Method 1631, promulgated under 40 CFR 136, to comply with the mercury monitoring requirements of this permit. The method detection level (MDL) for Method 1631 is 0.2 ng/L. The quantification level for Method 1631 is 0.5 ng/L.