



State of Ohio Environmental Protection Agency

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MONTGOME DAYTON WWTP

OSIKA, MARY

2008/06/02

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 2, 2008

Mayor and Council
City of Dayton
101 West Third Street
Dayton, Ohio 45402

**RE: City of Dayton WWTP
Compliance Evaluation Inspection
NPDES Permit No. OH0024881; Ohio EPA Permit No. 1PF00000*MD**

Ladies and Gentlemen:

On May 22, 2008, I conducted a compliance evaluation inspection at the Dayton Wastewater Treatment Plant to determine the facility's compliance with its NPDES discharge permit. Personnel from the Division of Wastewater assisted me during this inspection. A copy of the inspection report and summary is enclosed for you to review.

All areas evaluated were rated as satisfactory with the exception of the collection system which was rated as marginal due to the overflows and bypasses noted in the summary section. No response to this inspection is necessary. Please call me if you have any questions regarding this report at (937) 285-6101.

Sincerely,

Mary Osika
Environmental Specialist
Mid-Lower Great Miami River Basin Team
Division of Surface Water

Enclosure

cc: Tom Schommer, City of Dayton



Summary of Findings/ Comments

A list of all reported sanitary sewer overflows from the collection system for the review period of January 2007 through April 2008 is listed in Chart A. Nine (9) sewer overflow events were reported to this office during the review period.

A list of all reported bypasses and spills from the Dayton WWTP and influent pumping stations during the review period is listed in Chart B. Five (5) bypass and spill events were reported during this review period. A marginal rating was given to the collection system due to the bypasses at the influent pumping stations and overflows from the collection system.

There were no effluent limit violations or internal treatment bypasses reported during the review period.

The average and peak daily flow rates during this review period was 53 MGD and 135 MGD. During this review period for the effluent discharge, the average total suspended solids concentration was 1.8 mg/l, the average CBOD5 concentration was 1.1 mg/l, and the average ammonia concentration was 0.09 mg/l.



Chart A
Sanitary Sewer Overflows from the Sewage Collection System
January 2007 Through April 2008

Date	Overflow Location	Volume -gallons	Reason for Overflow	Receiving Stream
3/2/07	5502 Haverfield Rd.	20,000	grease	Little Beaver Creek
3/9/07	5502 Haverfield Rd.	20,000	grease	Little Beaver Creek
3/15/07	2300 Riverside Dr.	unknown	excessive rain	Stillwater River
4/12/07	Fernwood Ave.	24,000	vandalism	Stillwater River
4/25/07	1516 Foltip Dr.	unknown	grease	Wolf Creek
5/8/07	548 Acom Dr.	unknown	vandalism	ground
5/13/07	822 Blanche St.	unknown	grease, rags	Great Miami River
8/1/07	212 Shafor Blvd.	Unknown	debris	Great Miami River
1/10/08	200 Gilbert Ave.	1,200	unknown	Great Miami River

Chart B
Bypasses/Spills from the Dayton WWTP to the Great Miami River
January 2007 Through April 2008

Date	Bypass Location	Volume - gallons	Reason for Overflow/bypass
1/15/07	Broadway Pump Station	17,182,997	3 days of rain & bottleneck at LLPS
3/22/07	Broadway Pump Station	5,000	spill at rag box garage door
6/19/07	South Grease Pit	2,500	wash water/spill
7/25/07	Trickling Filters	57,870	operator error during filter flooding
1/9/08	Westwood Pump Station	115,350	pump failures





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
1PF00000*MD	OH0024881	5/22/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Dayton Wastewater Treatment Facility 2800 Guthrie Road Dayton, Ohio	10:00 am	August 1, 2003
	Exit Time	Permit Expiration Date
	12:30 pm	June 30, 2008
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Tom Schommer, Wastewater Treatment Manager Phil Bennington, Wastewater Operations Tom Dempsey, Wastewater Process John Lewis, Sewer Maintenance Operations Karen Tenore, Lab Supervisor		(937) 333- 1834
Name, Address and Title of Responsible Official		Phone Number
Mayor and Council City of Dayton 101 West Third Street Dayton, Ohio 45402		(937) 333- 3333

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	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	S	Other
M	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached summary of findings.	
Inspector	Reviewer
 Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
6/2/08 Date	6/2/08 Date



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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) Correct name and location of receiving waters..... | Y |
| (c) Product(s) and production rates conform with permit application (Industries)..... | N/A |
| (d) Flows and loadings conform with NPDES permit..... | Y |
| (e) Treatment processes are as described in permit application... | Y |
| (f) New treatment process(es) added since last inspection..... | Y |
| (g) Notification given to State of new, different or increased discharges..... | Y |
| (h) All discharges are permitted..... | Y |
| (i) Number and location of discharge points are as described in permit..... | Y |

Comments/Status:

f) Broadway PS Hydrogen Peroxide addition was moved to the Longworth Street PS. The trickling filters are operating at their design recirculation rate now. The dechlor system is being automated. Odor control deodorizer around primaries will be out for bid this summer.

Section F: Permit Compliance

- | | |
|--|---|
| (a) Any significant violations since the last inspection..... | N |
| (b) Permittee is taking actions to resolve violations..... | Y |
| (c) Permittee has a compliance schedule..... | Y |
| (d) Compliance schedule contained in <input type="text" value="permit"/> | |
| (e) Permittee is meeting compliance schedule..... | Y |

Comments/Status:

See attached summary of findings for table on permit violations.



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Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... IV
- (e) Operator of Record holds unexpired license of class required by permit..... Y
Class: IV
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained.... Y
- (k) Any plant bypasses since last inspection..... Y
- (l) Regulatory agency notified of bypasses..... Y
On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Computerized O & M by Hanson MMS v. 7, and SCADA
--
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) 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 operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification 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



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Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding Y
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

- b) See summary of findings for sanitary sewer overflows and bypasses.
- h) 11 small pumping stations do not have back up power. These systems have 24 hour wet well capacity and alarm systems so that City can send vac truck to remove contents until pumps are fixed.
- i) Dayton's contractor has prepared an I/I study and are modeling solutions. Major repairs to the sewer system included replacement or lining of sewers in the following areas: St. Clair St., Albany St., Nordale St., Ethel St., and Milton Street.
- j) Dayton received 1521 calls regarding basement flooding of which 531 were related to occupants own lateral.



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Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/E
- (b) Sludge management plan current..... N/E
- (c) Sludge adequately disposed..... Y
(Method: land application)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name: Synagro)
- (f) Has amount of sludge generated changed significantly since
last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... N/E
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N/E
- (k) Is sludge adequately processed (digestion, pathogen control)..... N/E

Comments/Status:

a) & b) Dayton meets the sludge regulations under OAC 3745-40.
h) j) & k) Jacob Howdysshell is the sludge coordinator that will determine compliance for these areas.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
(Date of last calibration: 5/9/2008)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range
of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

d) Parshall flume needs to be replaced on N primaries to handle wet weather flow rates.



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Section I. Self-Monitoring Program (cont)

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
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) 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
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... Y
 - (c) Analyses being performed more frequently than required by permit. Y
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... Y
- Lab name & Parameters analyzed by commercial lab:
Caltest- dieldrin
Test America – Strontium, arsenic, selenium, phosphorus
Ginosko- Low level mercury
Alloway- Bioassay
Enviroscience-bioassay

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
 - (g) Satisfactory calibration and maintenance of instruments/equipment. Y
 - (h) Adequate records maintained..... Y
 - (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
- Date: 8/31/2007

Comments/Status:

f) Dayton is updating their SOP in their QA/QC manual.
i) Fecal Coliform and Total Phosphorus were rerun as corrective action in DMR QA study 27.



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Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No	No	No	No	Slight	No	No	

Comments/Status:

Outfall sign requirement not in present permit; will be a condition in next renewal.
 Slight foam caused by outfall aeration channel.

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
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

