



Environmental
Protection Agency

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

February 7, 2011

RE: ASHTABULA CITY WPCF
ASHTABULA CITY, ASHTABULA COUNTY
OHIO EPA PERMIT 3PE00002
COMPLIANCE EVALUATION INSPECTION

Mr. Anthony Cantagallo, City Manager
City of Ashtabula
4717 Main Avenue
Ashtabula, Ohio 44004

Dear Mr. Cantagallo:

On February 3, 2011, a site inspection was conducted at the above referenced facility at 303 Woodland Avenue, City of Ashtabula, Ashtabula County. The inspection was conducted by John Schmidt of this office. Mr. Michael Mearini, Superintendent, represented the City of Ashtabula during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on November 18-19, 2009.

The Ashtabula Water Pollution Control Facility (WPCF) consists of a septage reception station which is not currently used, as the city has another reception station within the collection system, screening and grit removal, lift station, comminutor, pre-aeration/flocculation tanks, primary settling tanks/clarifiers, aeration tanks with sodium aluminate addition, clarification, chlorination disinfection, de-chlorination, post disinfection (cascading step) aeration, and an effluent sampling chamber. Sodium aluminate is fed for phosphate control since August 2010, and ferric chloride was fed prior to August 2010 for phosphate control. Sludge management consists of anaerobic digestion of both primary and secondary solids in separate digesters, dewatering with a centrifuge (belt filter press no longer used), with sludge taken to a solid waste landfill for disposal. The facility discharges to Lake Erie through a diffuser adjacent to the north side of the facility. Generators provide backup power to the entire facility.

Observations

Following are observations made during the inspection.

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Screenings and grit was containerized for disposal at a solid waste landfill.
2. Influent sampler is noted as a time proportional sampler and maintained at the proper temperature and condition. A replacement sampler that is flow proportional is stored at the facility and envisioned to be installed prior to March 1, 2011.

3. Primary clarifiers were observed with good settling with effluent weirs in acceptable condition. Effluent channels and weirs appear to have been scrubbed.
4. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming. Blowers supplying air were noted in operating condition.
5. The surface of the clarifier was clear. The effluent trough was clean and there was no scum around the effluent baffle or the trough. Effluent channels and weirs appear to have been scrubbed.
6. The chlorine contact tank was observed in acceptable condition. It is noted that site inspection was conducted outside the disinfection season on May-October.
7. The final effluent sampler is noted as a time proportional sampler and maintained at the proper temperature and condition. A replacement sampler that is flow proportional is stored at the facility and envisioned to be installed prior to March 1, 2011.
8. The WPCF laboratory performs monitoring of BOD, suspended solids, pH, volatile organic compounds (VOCs), chlorine, and nitrate-nitrite, ammonia nitrogen. Ashtabula contracts with Microbac Laboratories of Meadville, PA for metals, oil and grease, bacteria (E. Coli), toxicity testing, volatile organic compounds and semi-volatile organic compounds, and quality assurance samples from the WPCF laboratory.
9. The final effluent at the outlet to Lake Erie could not be observed due to flow to a diffuser in Lake Erie. The final outfall at Station 001 was observed as the final effluent sampling chamber downstream of the cascade aeration and found of acceptable visual quality.
10. Documents inspected during the site visit include a portion of the spill control and countermeasure plan (SPCC) that addresses storm water that contains some elements of a storm water pollution prevention plan (SWPPP), and appears to have been updated on August 1, 2010. The latest annual site certification inspection has not been completed yet as the document is still in draft form.
11. Regarding the City's industrial pretreatment program, pretreatment limits were last revised in 1998. A technical justification report for leaving the current pretreatment limits unchanged was completed on January 7, 2011. Ashtabula has proposed changing its surcharge fee schedule, but no changes in limits are proposed. There are no pending program modifications. No industrial users (IUs) have been placed on a compliance schedule within the past year. There have been no changes to the IU list, with the last additions including the Ashtabula River Partnership Landfill

leachate and the Fields Brook Landfill leachate added on November 17, 2008. All SIUs have been inspected and sampled within the past year. No IUs have been subject to a show-cause hearing, permit revocation, filing of a civil or criminal suit, or subject to termination of service within the past year.

12. The WPCF does accept hauled septage, liquid sludge, and landfill leachate by controlling where these wastes are accepted into the system. Due to odor problems at the WPCF from accepting wastes at the acceptance station at the WPCF, Ashtabula relocated the hauled waste acceptance station, currently landfill leachate from three facilities, at station on West 242th Street. This location provides better mixing of the waste with incoming waste waters and produces less of a shock load to the WPCF. Ashtabula has a testing program in place and requires testing for all industrial waste permit haulers, with annual testing and some random load testing. Currently, the influent waste strength as received by the WPCF is between 100 and 120 mg/l BOD, and Ashtabula is contemplating accepting septage at the WPCF again, which it discontinued in 1994.
13. Ashtabula has been working in concert with the Ashtabula County Port Authority to extend sewers to industrial customers along State Road between Lake Street (State Route 531) and Middle Road. The sewers are anticipated to be completed by early summer 2011. Entities proposed to be tied into this line include State Road Industrial Development, LLC, Fields Brook Landfill, and the Ashtabula River Partnership Landfill. If sewers are available and accessible (within 200 feet of property lines), Ohio EPA will expect at a minimum the sanitary flows from other businesses to be tied into these sewers. Ohio EPA has no record of a permit-to-install (PTI) submitted for these sewers from either the City of Ashtabula or the Ashtabula County Port Authority. A PTI must be approved prior to commencing construction of these sewers.
14. During our visit, Mr. Mearini indicated that he has completed all documentation for obtaining his Class IV wastewater operator's license, with the documentation under review by the Operator's Board. The Board is expected to complete its review by February 17, 2011, and will notify Mr. Mearini of the outcome of that review by February 18, 2011.

NPDES Permit Compliance Review

The City of Ashtabula operates the Ashtabula WPCF under NPDES Permit 3PE000002*MD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period December 1, 2009 through February 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	61428	Chronic Toxicity, Pimeas P.	30D Conc	11.0	18.2	3/1/2010
001	50060	Chlorine, Total Residual	1D Conc	0.038	.19	7/1/2010
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	7.69	11/1/2010
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00012	11/1/2010

Regarding the chronic toxicity value, Ohio EPA is aware that the city of Ashtabula is conducting a Toxicity Reduction Evaluation (TRE) on the Ashtabula WPCF, and recently changed from ferric chloride to the less toxic sodium aluminate for phosphate control. Ashtabula provided responses and explanations of these violations dated March 5, 2010, August 25, 2010, and December 28, 2010. No additional response is need to these exceedence events at this time.

Reporting Violations

The following reporting code violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31648	E. coli			AB	8/4/2010
001	50050	Flow Rate			AD	9/13/2010
001	80082	CBOD 5 day			AB	10/28/2010
601	80082	CBOD 5 day			AB	10/28/2010
001	80082	CBOD 5 day			AB	10/29/2010
601	80082	CBOD 5 day			AB	10/29/2010
001	80082	CBOD 5 day			AB	11/1/2010
601	80082	CBOD 5 day			AB	11/1/2010

Ashtabula provided verbal responses for the August and September 2010 events, and written responses and explanations of remaining violations dated November 24, 2010 and December 28, 2010. No additional response is need to these reporting violations at this time.

The following reporting frequency violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50092	Mercury, Tot Low Level	1/2Weeks	1	0	01/01/2010
601	50092	Mercury, Tot Low Level	1/2Weeks	1	0	01/01/2010

Please provide an explanation as to why the parameter was not collected and analyzed at the frequency prescribed by your NPDES permit. Please note that Ohio EPA expects schedules to be adjusted over holiday periods to ensure that the parameters are collected

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at the frequencies as prescribed by your NPDES permit. Reporting codes for weekends and holidays may only be used on parameters required to be collected daily.

Compliance Schedule

Regarding the compliance schedule, Ohio EPA notes the following:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
4/1/2007	7/31/2011	4/1/2010	4/1/2010	91299	Other	Submit Corrective Action Plan
4/1/2007	7/31/2011	8/1/2010	9/10/2010	3099	Construction	Begin Construction
4/1/2007	7/31/2011	12/1/2010	9/10/2010	5699	Construction	Final Compliance w/ Eff Limits
12/1/2010	7/31/2011	12/31/201	01/07/2011	----	Other	Annual WET Report
12/1/2010	7/31/2011	12/1/2010	Unknown	----	Construction	Construction Plan
12/1/2010	7/31/2011	01/01/2011	Unknown	----	Construction	Initiate Construction
12/1/2010	7/31/2011	12/1/2010	01/07/2011	----	Pretreatment	Evaluate Existing Local Limits
12/1/2010	7/31/2011	05/01/2010	01/07/2011	52699	Pretreatment	Revise Local Pretreatment Limits
12/1/2010	7/31/2011	07/01/2011	01/07/2011	52599	Pretreatment	Tech Justification for Limits
12/1/2010	7/31/2011	7/31/2011	01/07/2011	52699	Pretreatment	Revise Local Limits (if needed)
12/1/2010	7/31/2011	04/01/2008	04/01/2008	95999	Construction	E Coli Status Report
12/1/2010	7/31/2011	10/01/2008	04/01/2008	----	Construction	Submit E Coli PTI (if needed)

It is noted that some information was received after the date(s) prescribed by your NPDES permit, however the information was received. Ohio EPA acknowledges that some information outstanding is dependent upon the findings of the ongoing toxicity reduction evaluation (TRE). No additional information is needed at this time.

Other NPDES Permit Issues

Ohio EPA notes that Part II, Item A of your NPDES permit requires that the facility be operated by a Class IV operator. Ohio EPA further notes that Ashtabula was granted an extension to have the interim superintendent operate the plant while he obtains his Class IV license. As noted above, the status of Mr. Mearini's application as a Class IV operator should be known by February 18, 2011. Please forward to this office the outcome of the license application.

SSO Reporting

Ohio EPA notes that the following sanitary sewer overflows (SSOs) occurred within the Ashtabula WPCF service area in 2010: 1) West 9th Street at Ashtabula River; 2) 5th Street by Ore House at Ashtabula River; 3) State Road north of East 42nd Street at Ashtabula River; 4) East 16th Street at fields Brook; and Carpenter Road Pump Station at Red Brook. Ohio EPA acknowledges that Ashtabula is in the process of numbering all possible SSOs in their system so that in the event that there are any SSO events they may be consistently reported into the eDMR. Please forward to Ohio EPA this listing so that it may be referred to for future submissions.

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Based upon the inspection findings and the overall compliance record of the facility, the City of Ashtabula is considered to be in substantial compliance with the terms and conditions of its NPDES permit for the Ashtabula WPCF.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

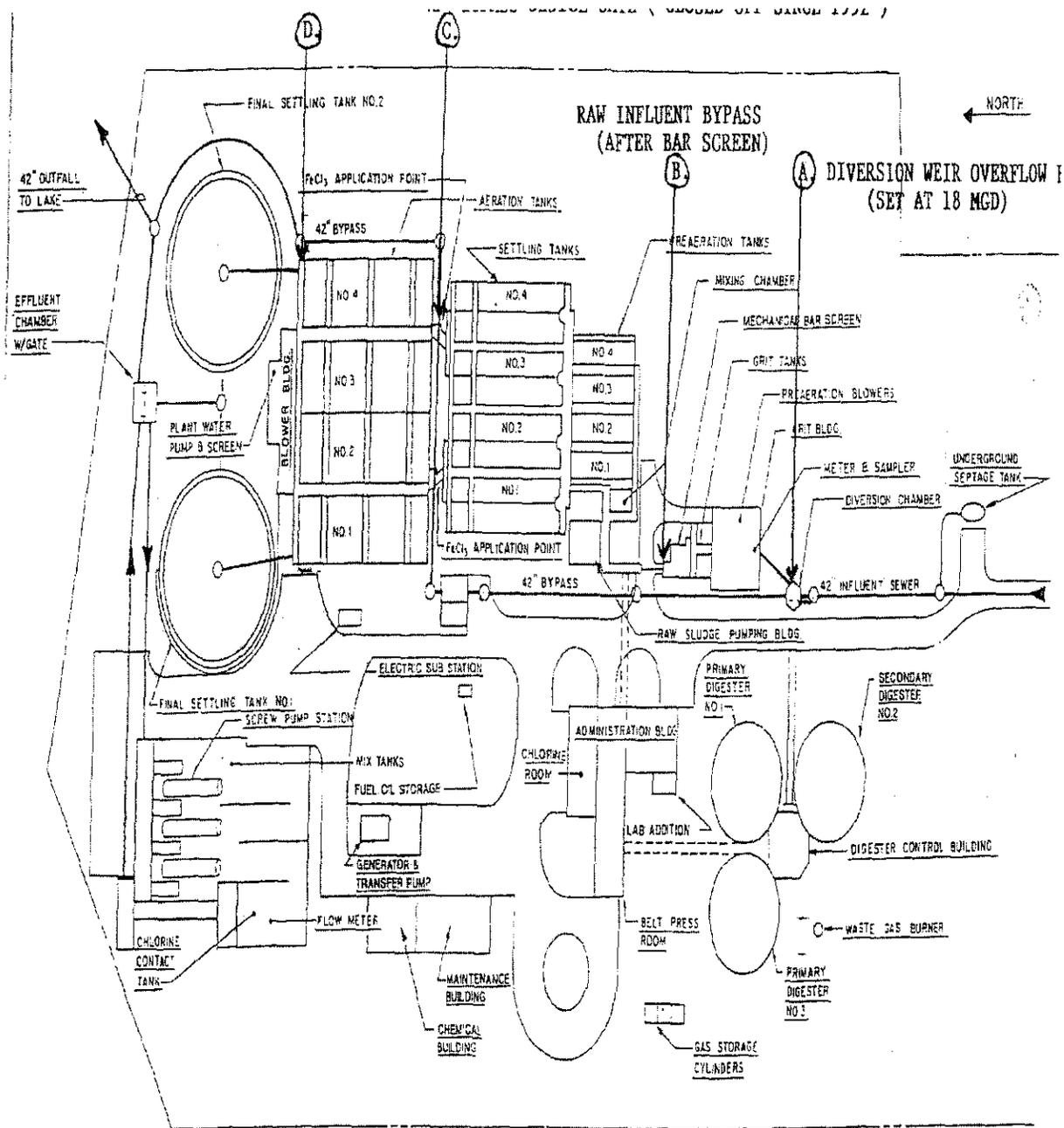
Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

File: Municipal/Ashtabula City WPCF (Ashtabula Co.)/PC



NOTE: (A) & (B) CAN NOT BE USED WITH (C) CLOSED OFF (D) SECONDARY BYPASS NEVER USED.

SITE

W.F.

Reconnaissance Inspection Checklist

Facility Name: *Ashtabula WPCF*

NPDES Permit Number: *3PE 0000 02 #ND*

Inspector(s): *John Schmitt*

Date of Inspection: *2-3-2011*

Facility Representative(s):

Mike Messina, supt

* Explain all "Yes" answers on following sheets

last prepared sheet

	Question	Yes*	No	N/A
1	Do you have any pending program modifications?	<input checked="" type="checkbox"/>		
2	Are you planning to submit any program modifications in the next year?	<input checked="" type="checkbox"/>		
3	Have there been any changes to your SIU list?	<input checked="" type="checkbox"/>		
4	Were any SIUs not inspected or sampled at least once in the past year?		<input checked="" type="checkbox"/>	
5	Has an IU been placed on a compliance schedule in the past year?		<input checked="" type="checkbox"/>	
6	Has any IU been subject to a Show Cause hearing, Permit Revocation, Filing of a Civil or Criminal suit, or subject to termination of service in the past year?		<input checked="" type="checkbox"/>	
7	Does the WWTP accept hauled wastes, including septage?	<input checked="" type="checkbox"/>		
8	Has the WWTP or collection system experienced any of the following in the past year?			
8a	Interference		<input checked="" type="checkbox"/>	
8b	Pass through		<input checked="" type="checkbox"/>	
8c	Fire or explosions		<input checked="" type="checkbox"/>	
8d	Corrosive structural damage		<input checked="" type="checkbox"/>	
8e	Flow obstructions		<input checked="" type="checkbox"/>	
8f	Heat problems		<input checked="" type="checkbox"/>	
8g	Oil and grease interference		<input checked="" type="checkbox"/>	
8h	Toxic fumes		<input checked="" type="checkbox"/>	
8i	Illicit dumping of hauled waste		<input checked="" type="checkbox"/>	
8j	Excessive flow rates or pollutant concentrations		<input checked="" type="checkbox"/>	
8k	Any worker health and safety issues		<input checked="" type="checkbox"/>	
8l	Other (specify)		<input checked="" type="checkbox"/>	
9	Are you having any problems implementing your MIPP?		<input checked="" type="checkbox"/>	

Further information for "Yes" responses

1	Brief description and status	surcharge rates changed WWT testing conc unchanged. per lb. surcharge charged \$00 17¢/# 55 17¢/#
2	Planned modification; reason	Already in codified ordinance - do need to go O&PA too? COD - 2000 mg/l. w/ 17¢/# surcharge if over.
3	Changes; why made	Added Ash RAP LF and Fields Brook were reflected in Annual report for 2008. to 5500 gal on 11-17-08.
4	Explain why	
5	Brief history; current status	
6	Brief history; current status	
7	How does WWTP control?	Do accept LF leachate see #3 above. Also leachate from General LF (WWE).
8	Describe event, WWTP response	
9	Describe problem, planned response	

200 200 15 100 mg/l
 BOD, SS, P, O&G
 p. 3.75, O&G 43.25
 # #

submit

in 2008
 11-14-2008.