

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

November 1, 2010

RE: ASHTABULA COUNTY
CONNEAUT CITY WWTP
OHIO EPA PERMIT 3PD00002
COMPLIANCE EVALUATION INSPECTION

Mr. Craig Pierce, Wastewater Superintendent
City of Conneaut
294 Main Street
Conneaut, OH 44030

Dear Mr. Pierce:

On October 28, 2010, a site inspection was conducted at the above referenced facility at 1206 Broad Street Extension, Conneaut City. The inspection was conducted by John Schmidt of this office. You and Bob DeMarco represented the City of Conneaut on 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 reconnaissance inspection was conducted on May 21, 2009, and the last full compliance inspection was conducted on September 17, 2008.

The initial plant was constructed as a primary treatment facility in 1899-1901 and upgraded to secondary treatment in 1972. Various improvements have been made since 1972. The system consists of a parshall flume, screening and grit removal, equalization tank, comminutor, primary clarifiers, sodium aluminate addition, aeration tanks, mixed liquor meters, secondary clarification, chlorine disinfection, sodium bisulfate dechlorination, and post disinfection aeration. Sodium aluminate is fed for phosphate control, and sodium bisulfate is fed for chlorine residual control. Sludge management consists of anaerobic digestion and settling tanks, dewatering with a belt filter press, with sludge land applied to farmer's fields as Class B sludge in Monroe Township. The facility discharges to Lake Erie adjacent to the east side of the facility. Generators provide backup power to the entire facility. A schematic diagram of the plant is attached.

Ohio EPA understands that the plant has two bypasses in the system; one is from the equalization tank when flows exceed 5.5 MGD and the other is from the primary clarifier splitter box. The primary clarifier bypass discharges to the chlorine contact tank. The equalization tank bypass discharges to the effluent line downstream of the effluent sampling station. As a result, the equalization tank bypass is not tributary to the permitted outfall.

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Pursuant to Ohio EPA's June 15, 2009 inspection letter regarding the May 21, 2009 inspection, Conneaut submitted a permit-to-install (PTI) to modify the bypasses so that they are both tributary to Outfall 001. The PTI application is pending with the Agency.

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. Primary clarifiers were observed with good settling with effluent weirs in acceptable condition. Effluent channels and weirs are scrubbed weekly.
3. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming. 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 are scrubbed weekly.
4. The chlorine contact tank contained some sludge balls floating within the tank. This was also noted during the May 21, 2009 inspection. An explanation offered included procedures to clean the plant grease trap may result in over-pumping, sending excess grease to the plant.
5. Conneaut contracts with Synergrow to conduct belt pressing of sludge and to haul sludge and land apply it. Sludge pressing was occurring at the time of the inspection.
6. Composite samples are collected with a flow proportional sampler.
7. The WWTP laboratory performs monitoring of BOD, suspended solids, pH, volatile organic compounds (VOCs), chlorine, and ammonia nitrogen. Conneaut contracts with Microbac Laboratories of Meadville, PA for metals, oil and grease, nitrate-nitrite, bacteria (E. Coli), and quality assurance samples from the WWTP laboratory.
8. The final effluent at the outlet to Lake Erie could not be observed due to the outlet being submerged. Per Mr. Pierce this outfall dates to the original construction of the plant in 1901 (see attached pictures). The final outfall at Station 001 was observed at the outlet of the chlorine contact tank and found of acceptable visual quality.

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NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2008 through October 1, 2010 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:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|------------------------|------------|-------|----------------|----------------|
| 001 | 61942 | pH, Minimum | 1D Conc | 6.5 | 6.4 | 11/7/2008 |
| 001 | 50060 | Chlorine, Total Residu | 1D Conc | 0.038 | .05 | 10/22/2009 |
| 001 | 61942 | pH, Minimum | 1D Conc | 6.5 | 6.3 | 10/20/2009 |
| 001 | 61942 | pH, Minimum | 1D Conc | 6.5 | 6.4 | 10/21/2009 |
| 001 | 00665 | Phosphorus, Total (P) | 30D Conc | 1.0 | 1.06889 | 6/1/2010 |
| 001 | 00552 | Oil and Grease, Hexane | 1D Conc | 10 | 11. | 5/15/2009 |
| 001 | 00530 | Total Suspended Solids | 30D Conc | 20 | 20.0322 | 12/1/2008 |
| 001 | 00530 | Total Suspended Solids | 30D Qty | 227 | 297.892 | 12/1/2008 |
| 001 | 00530 | Total Suspended Solids | 7D Qty | 341 | 373.445 | 12/8/2008 |
| 001 | 00530 | Total Suspended Solids | 7D Qty | 341 | 433.676 | 12/22/2008 |

During my visit, Mr. DeMarco provided me with responses from Conneaut to Ohio EPA dated November 30, 2008, January 15, 2009, May 26, 2009, June 16, 2009, November 12, 2009, and July 16, 2010 which have now been incorporated into Ohio EPA's files. No additional response is need to these exceedence events at this time.

Reporting Violations

No reporting violations were noted.

Compliance Schedule Violations

Ohio EPA notes the following regarding the compliance schedule:

| Permit Effective Date | Permit Expiration Date | Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone |
|-----------------------|------------------------|-------------------|-----------------|------------|---------------|--------------------------------|
| 12/1/2009 | 7/31/2011 | 6/1/2010 | 6/1/2010 | 52699 | Pretreatment | App of Eff Limits for Polluts |
| 12/1/2009 | 7/31/2011 | 7/1/2010 | 8/3/2010 | 5699 | Construction | Final Compliance w/ Eff Limits |
| 12/1/2009 | 7/31/2011 | 9/1/2010 | 8/3/2010 | 1299 | Construction | Final Plan Submitted |

No additional response is needed at this time.

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SSO Reporting

During the site visit, Conneaut acknowledged that beginning on March 24, 2010, residential and commercial structures on Harbor Street and Valley Street were found discharging to the City's storm water system. Ohio EPA was notified on March 26, 2010. The properties were disconnected from the storm water sewers and connected to the sanitary sewer system on various dates between March and July 2010. Two homes remain to be connected and Conneaut anticipates connecting them within the next two weeks. Conneaut will advise Ohio EPA in writing when activities have been completed.

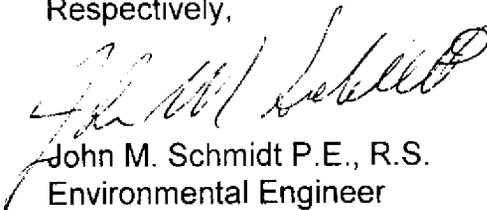
Another SSO was determined along Harper Street where the sanitary sewer is leaking into the storm sewer, with no direct connections. Conneaut applied and received a grant through the community distress program to reline approximately 700 LF of sewer line. The Ohio Water Pollution Control Loan Fund has awarded the grant and Conneaut is awaiting funds to commence this work. Conneaut projects to complete the relining project by December 31, 2010. Conneaut will advise Ohio EPA in writing when activities have been completed.

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

Ohio EPA reminds Conneaut that its current NPDES permit will expire on July 31, 2011; therefore its NPDES renewal application is due to Ohio EPA no later than January 31, 2011.

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

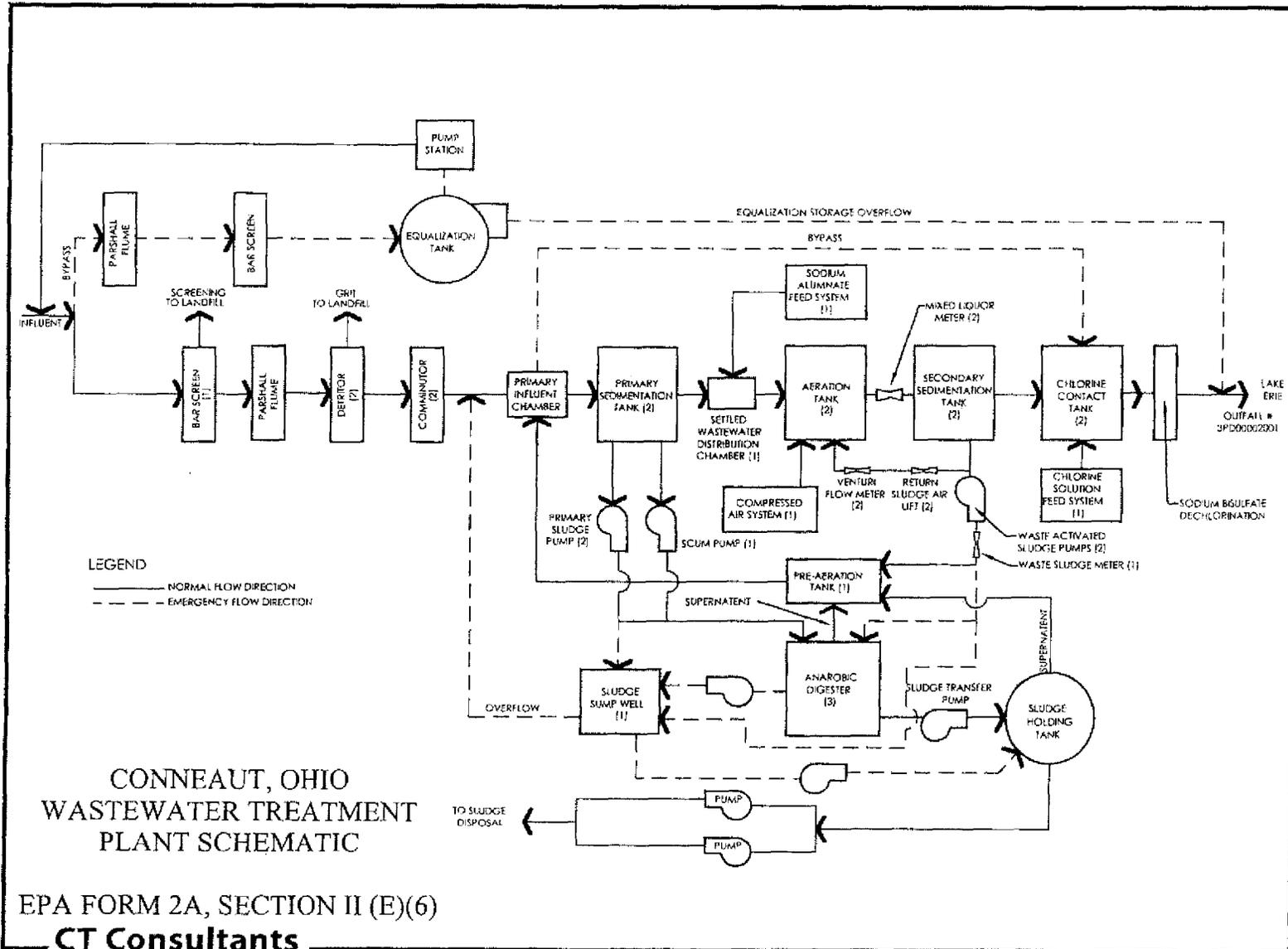
Respectively,



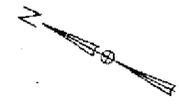
John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

File: Municipal/Conneaut City WWTP (Ashtabula Co.)/PC



CITY OF CONNEAUT, OHIO
WASTEWATER TREATMENT PLANT SITE
EPA FORM 1, SECTION XI



CT Consultants

Discharge at Channel



Grease Balls in Chlorine Contact Tank

