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State of Ohio Environmental Protection Agency
Central District Office

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FILE COPY

June 30, 2009

Mayor and Council
City of Lancaster
104 East Main Street
Lancaster, OH 43130

Dear Mayor and Council:

Enclosed is a report regarding a Compliance Evaluation Inspection that Dan Gill and I from this office performed at the City of Lancaster Wastewater Treatment Plant (WWTP) on June 11, 2009. During the inspection we met with Michael Nixon (Water and Wastewater Superintendent) and Paul Menz (WPCF Plant Manager).

A portion of the inspection focused on the City's implementation of the Nine Minimum Controls (NMC) for reducing combined sewer overflow (CSO) impacts and the degree of implementation of the City's improvement projects for controlling CSOs. The Nine Minimum Controls are included in Part II, Item F of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 4PD00001*KD), and the improvement project implementation schedule is listed in Part I, C of this same permit.

Discussion during the inspection and review of information that you have submitted to this office indicates that the City is in compliance with permit requirements calling for implementation of the Nine Minimum Controls. Please note that continued implementation of the Nine Minimum Controls is critical to your achieving compliance with your NPDES permit.

The current status of the City's Combined Sewer Overflow Long-Term Control Plan was also discussed during the inspection. The City is currently on or ahead of schedule with these projects, which include the Lake/Allen/Maple Separation project and construction of the Upper Hocking Water Pollution Control Facility.

If there are questions regarding the Nine Minimum Controls please contact Dan Gill by telephone at 614-644-2118 or by e-mail at dan.gill@epa.state.oh.us . If there are other questions, I can be reached by telephone at (614) 728-3850 or by e-mail at jan.rice@epa.state.oh.us.

Sincerely,

Jan Rice

Jan A. Rice
Environmental Specialist
Division of Surface Water
Central District Office

Daniel P. Gill
Environmental Specialist
Division of Surface Water
Central Office

Enclosures

c: Michael Nixon, Superintendent
Paul Menz, Plant Manager

JAR/DPG/nsm Lancaster 6-11-09 CElcovltr

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
4PD00001*KD	OH0026026	6/11/09	CEI	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Lancaster Wastewater Treatment Plant (WWTP) 800 South Lawrence Street Lancaster, Ohio 43130	10:00 A.M.	6/1/07
	Exit Time	**Permit Expiration Date**
	1:25 P.M.	5/31/12

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Michael Nixon, Superintendent Paul Menz, Plant Manager	740-687-6664 740-687-6664
Name(s) Address and Title(s) of Operator of Record	**Phone Number(s)**
Paul Menz, Plant Manager, 800 Lawrence St., Lancaster, Ohio 43130	740-687-6664
Name, Address and Title of Responsible Official	**Phone Number**
Michael Nixon, Superintendent	740-687-6664

C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit
S/S	Records/Reports
S	Operations & Maintenance
S	Facility Site Review
M	Collection System - permittee is continuing work necessary to reduce the overflow frequency to what is required in the wastewater discharge permit.
S	Flow Measurement
S	Laboratory
M/S	Effluent/Receiving Waters – effluent limitations violations are listed in Attachment "A" of this report.
S/S	Sludge Storage/Disposal
N	Pretreatment – a pretreatment inspection was conducted 12/5/07.
S	Compliance Schedules
S	Self-Monitoring Program

D. SUMMARY OF FINDINGS/COMMENTS: The permittee is continuing with its CSO control program as is required in the wastewater discharge permit schedule of compliance. The Upper Hocking WWTP is under construction.

Jan Rice — Daniel P. Gill — 6/30/09

Inspectors: Jan A. Rice, OEPA/CDO — Daniel P. Gill, OEPA/CO — Date

Erin Sherer — 6-30-09

Erin Sherer, Reviewer, Ohio EPA, Central District Office — Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges		X		
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	*X			

Comments: *i. – the number of combined sewer overflow monitoring stations is decreasing as these overflow points are eliminated.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	*X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in: permit	X			
e. Permittee is meeting compliance schedule	X			

Comments: *a. – effluent limitation violations are listed in Attachment "A" of this report.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator X Dual Feed ____	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	*X			
d. Sufficient operating staff provided: # of shifts 3 Days/Week 7	X			
e. Operator holds unexpired license of class required by permit Class: IV	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses ____ on MORS ____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: *c. – a rectangular, backup primary clarifier is being repaired.

Collection System a. Percent combined system: less than 10%	Yes	No	N/A	N/E
b. Any collection system overflows since last inspection (CSO X SSO X)	X			
c. Regulatory agency notified of overflow (SSOs)	X			
d. CSO O and M plan provided and implemented	X			
e. CSOs monitored and reported in accordance with permit	X			
f. Portable pumps used to relieve system		X		
g. Lift station alarm systems provided and maintained	X			
h. Are lift stations equipped with permanent standby power or equivalent	X			
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	X			
j. Any complaints received since last inspection of basement flooding	X			
k. Are any portions of the sewer system at or near capacity		X		

Comments: *d. – Attachment "B" of this report includes a CSO inspection checklist that was used during this inspection. *j – water in basement occurrences have been listed in the 2008 Sanitary Sewer Overflow Annual Report.

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current				*X
c. Sludge adequately disposed (Method: land application)	X			
d. If sludge is incinerated, where is ash disposed of?		X		
e. Is sludge disposal contracted (Name: Synagro)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP	X			
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)				X

Comments: *b - land application of sludge must occur in accordance with Chapter 3745-40 of the Ohio Administrative Code.

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: X radar & parshall flume — calculated from influent weir — Other ultrasonic & weir — Specify: _____	X			
b. Calibration frequency adequate (date of last calibration: new Magnetrol radar flow meter installed in 2008)	X			
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: X Daily; Weekly; Monthly; Other				

Part 2 - Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used	X			
Iii Containers and sample holding times prior to analyses conform with 40 CFR 136.3	X			
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Part 3, Laboratory - General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b. If alternate analytical procedures are used, proper approval has been obtained		X		
c. Analyses being performed more frequently than required by permit	X			
d. If (c) is yes, are results reported in permittee's self-monitoring report	X			
e. Commercial laboratory used 1. Parameters analyzed by commercial lab: low level mercury, cyanide, metals and dioxin) 2. Lab name: Test America	X			

Part 3, Laboratory - Quality Control/Quality Assurance	Yes	No	N/A	N/E
f. Quality assurance manual provided and maintained	X			
g. Satisfactory calibration and maintenance of instruments and equipment	X			
h. Adequate records maintained	X			
i. Results of latest U.S. EPA quality assurance performance sampling program: the permittee participated in DMRQA 28 but study results not yet available from the Ohio EPA laboratory. The permittee intends participating in DMRQA 29.				

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
1	None	None	None	Slight	None	Color	

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

Attachment "A"
City of Lancaster
Effluent Limitation Violations
7/1/06 – 4/30/09

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PD00001*ID	September 2006	001	50060	Chlorine, Total Residual	1D Conc	0.021	.16	9/5/2006
4PD00001*JD	December 2007	001	00719	Cyanide, Free	30D Conc	0.014	2.78	12/1/2007
4PD00001*JD	December 2007	001	00719	Cyanide, Free	30D Qty	0.53	82.8420	12/1/2007
4PD00001*JD	December 2007	001	00719	Cyanide, Free	1D Conc	0.052	2.78	12/4/2007
4PD00001*JD	December 2007	001	00719	Cyanide, Free	1D Qty	1.97	82.8420	12/4/2007
4PD00001*JD	June 2008	001	00530	Total Suspended Solids	30D Conc	12	17.5	6/1/2008
4PD00001*JD	June 2008	001	00530	Total Suspended Solids	7D Conc	18	22.6666	6/1/2008
4PD00001*JD	June 2008	001	00530	Total Suspended Solids	30D Qty	454	621.425	6/1/2008
4PD00001*JD	June 2008	001	00530	Total Suspended Solids	7D Qty	681	831.917	6/1/2008
4PD00001*JD	June 2008	001	00530	Total Suspended Solids	7D Conc	18	23.3333	6/22/2008
4PD00001*JD	June 2008	001	00530	Total Suspended Solids	7D Qty	681	780.161	6/22/2008

Part II – Other Requirements Item F, in the permittee's NPDES permit (Ohio EPA No. 4PD00001), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls. Part II.B. of the National CSO Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

1. Proper operation & regular maintenance programs for the sewer system and CSOs.

City of Lancaster staff operates and maintains the water pollution control facility (WPCF) and collection system. City staff inspects all CSOs after rainfall (based on existing knowledge of the system's response to rain), as well as, twice per week regardless of the occurrence of wet weather to ensure dry weather overflows are not taking place. Summaries of CSO characteristics are reported to Ohio EPA monthly.

The City implements a combined sewer system operational plan that was developed in 1998. It was stated during the inspection that portions of the collection system which are prone to solids deposition are cleaned on a routine basis. Catch basins are cleaned by the City's Stormwater Utility.

Records of televising activities, inspections, collection system maintenance and repairs are maintained by City staff in a centralized database keeping note of date, time, items requiring attention, and corrective measures taken.

2. Maximum use of the collection system for storage.

Full treatment capabilities of the WWTP are used during wet weather. CSOs are regulated by a combination of fixed and leaping weirs, which City staff reports are set to maximize storage in the collection system (without causing flooding problems upstream). Additionally, the City continues to close CSO outfalls as separation and Inflow/Infiltration removal work allows. To date, twenty (20) of the original thirty-three (33) CSOs have been eliminated including those susceptible to backflow conditions.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.

The City implements an approved pretreatment program: Multiple industrial closures have recently taken place in Lancaster resulting in significantly diminished industrial discharge volumes to the City's collection and treatment system.

4. Maximize flow at the WWTP for treatment.

The wastewater treatment plant is an activated sludge (conventional) facility designed to treat an average daily flow of 10 MGD. The treatment facility is capable of handling sustained peak influent flows of 18 MGD (with 12 MGD actually being discharged). City staff operates the facility at peak capacity during wet weather. Additionally, a 1 MG Equalization Tank located at the wastewater treatment plant is operated to capture the first flush of wet weather pollutants and minimize bypasses.

5. Prohibition of CSOs during dry weather.

CSOs outfalls are inspected twice per week regardless of wet weather. The permittee stated that no dry weather overflows have been observed. **The City should amend CSO inspection sheets to document dry weather inspection activities.**

6. Control of Solid and Floatable Materials in CSOs.

Catch basins and sewer lines are cleaned on a routine basis. Street sweeping equipment is routinely operated throughout the City. The City also implements a leaf pick-up program.

7. Pollution prevention.

The City has sewer use and anti-litter ordinances in place. The Storm Utility also implements an educational outreach program.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.

The City has posted signs at each of the outfalls. The City has made information available on its website regarding CSOs in general and the specifics steps Lancaster is taking to address its CSOs. The City also periodically sends out informational bill

stuffers and includes monthly articles in the local newspapers.

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

The City is continuing to monitor its CSOs according to requirements contained in the permittee's NPDES permit (Ohio EPA No. 4PD00001).

U.S. EPA	REGION 5 CSO INSPECTION CHECKLIST				PAGE __ OF __
NPDES PERMIT #: 4PD00001*KD	FACILITY: Lancaster WPCF			INSPECTORS: Dan Gill and Jan Rice	MO/DAY/YR: 6/11/2009
✔ CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
CSO IDENTIFICATION					
1. Are all CSO, SSO, and Bypass locations identified and permitted? Include the total number of each.	X				13 CSOs (33 originally), 1 Bypass (002 EQ Tank overflow), 0 SSOs (station 300 is in the NPDES permit: 4 were reported during the 1st quarter of 2008 – isolated incidences)
2. Does the facility have maps/schematics of the sewer system depicting Combined Sewer System (CSS) areas and Sanitary Sewer System (SSS) areas including CSO, bypass and SSO locations and receiving stream(s)?	X				Physical copies are maintained; the City is working to digitize these into a GIS database; a model was developed with LTCP development
3. Are all CSO's identified by latitude/longitude (to a tenth of a second), identification number, street address and receiving stream?	X				Information located in NPDES permit
DRY WEATHER OVERFLOWS (DWOs)					
4. Does the facility check CSO locations during dry weather?	X				The CSOs are checked twice per week regardless of wet weather
5. If DWOs are identified, has the facility properly notified the NPDES regulatory authority of all DWO discharges, including both verbal and written notification?			X		None have been observed during the last several years
6. If DWOs are occurring, does the facility have a corrective action plan to eliminate these DWOs? If yes, describe plan including defined tasks and schedules?			X		Implementation of a routine maintenance program has eliminated historical DWOs
DESCRIPTION OF SYSTEM					
7. Is there an inventory of the whole sewer system (e.g. sewer system map), and, if so, are the following items identified?					Maps maintained, inventory updated with LTCP development

U.S. EPA	REGION 5 CSO INSPECTION CHECKLIST				PAGE __ OF __
a. All combined sewers and all sanitary sewers tributary to the combined sewers,	X				
b. All storm sewers connected to combined sewers,	X				1 cross-connection exists at CSO 16 → monitored in accordance with NPDES permit requirements
c. All major interceptors and trunk sewers,	X				
d. All sewer sizes, slopes and materials,	X				
✔ CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
e. All manholes and catch basins,	X				Mapped out – working to develop a numbering system in association with the GIS efforts
f. All CSOs (and SSOs), treatment plant bypasses and outfalls and the receiving stream(s).	X				
g. All control structures (regulators, diversion structures, weirs, valves....),	X				The CSOs are regulated by a combination of leaping weirs and fixed-weirs; all regulators are non-mechanical
h. All pump and lift stations and their capacities,	X				
i. All locations for sampling, monitoring, sensors, and telemetering devices,	X				Listed in NPDES permit
j. All CSO treatment facilities including unit processes and capacities,	X				1 MG EQ Tank is located at the POTW
k. All outfalls to environmentally sensitive areas?	X				
8. Is the capacity of each interceptor sufficient to handle all dry weather flows?	X				

9. Is the wet weather WWTP treatment capacity known? Include peak hydraulic flow, peak sustained treatable flow and average design flow.	X				Average design flow: 10 MGD Peak sustained flow: 18 MGD can be taken in with 12 MGD actually going out the effluent Peak hydraulic flow: 18 MGD (influent) as limited by the aeration tanks The POTW is an activated sludge (conventional) treatment facility
10. Are portions of the interceptors or other lines adequately sized relative to the WWTP capacity? If not, identify undersized interceptors.	X				
11. Is the wet weather treatment capacity of the WWTP fully used before CSOs occur?	X				
12. Are all lift stations adequately sized and operating as designed, and are mechanisms in place to ensure the continuous operation of the pumps?	X				
13. Is standby power available for regulators and CSO controls?	X				Permanent back-up and portable generators are available
✔ CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
OPERATION & MAINTENANCE					
14. Has the facility developed and submitted a Combined Sewer Operational Plan (OP) or a CSS O&M manual, and does it address O&M of the sewer system?	X				A CSSOP was submitted to Ohio EPA on 4/1/1998
15. Has the OP been approved by the State or U.S. EPA?		X			No final approval action was taken
16. Is the facility implementing the OP in a timely manner?	X				
17. Does the facility conduct regular inspections of the sewer system? If yes, what is the inspection method and frequency/schedule for the following:					
a. CSO (and SSO) outfalls structures,	X				Inspected twice per week and according to rainfall (based on existing knowledge of system response)

b. Regulator and diversion structures,	X				See (a)
c. Pump/lift stations,	X				Checked 365 days a year and equipped with SCADA
d. Sewers (e.g. televise), and		X			As needed
e. Surface water anti-intrusion devices (e.g. flapgates, etc.)?			X		Outfalls that were susceptible to backflow conditions have been closed
18. Is the maintenance program effective in reducing sewer line and lift station problems? If yes, give examples.	X				CSO inspection duties were increased in 2000 resulting in elimination of DWOs associated with grit and debris accumulation
19. Are malfunctions of equipment repaired or replaced in a timely manner? If yes, give example.	X				Critical spares kept on-hand; pump stations have built-in redundancy
20. Does the facility check for and eliminate illegal connections? If yes, describe method and frequency.	X				Flow meters are installed in areas where pump station monitoring data suggests excessive I/I to allow specific sources to be identified; smoke and dye testing were completed in association with LTCP development
21. Does the facility properly operate all CSO control facilities during both dry and wet weather?	X				
22. Does the facility have schedules for routine maintenance such as catch basin cleaning and cleaning of trunk and interceptor sewers?	X				Problem areas in the collection system have been identified and are cleaned on a routine basis; the City's Storm Utility department is responsible for cleaning catch basins; the City recently purchased a Vac-Con truck
✔ CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
23. Does the facility have schedules for pollution prevention measures such as: regular street cleaning in combined sewer areas with added emphasis on leaf removal, industrial flow control, drainage area marking, etc.?	X				Leaf pick-up in the fall; street sweeping (2 trucks); educational outreach program implemented by the City's stormwater program
24. Are the stop planks, weirs, etc. set at the highest level practical without causing basement backups or excessive street flooding?	X				Adjustments are made based on continued system characterization efforts

U.S. EPA	REGION 5 CSO INSPECTION CHECKLIST				PAGE __ OF __
25. Does the facility have (and describe) procedures for:					
a. Cleaning screening equipment after, and if necessary, during each storm,	X				Coarse (3") bar racks on three (major) pump stations are manually raked daily
b. Regulating diversion and bypass valves, and			X		Non-mechanical
c. Reducing solids deposition in the CSS?	X				Pollution prevention and routine maintenance measures noted above
26. Can the overall condition of the entire sewer collection system and CSO be described as good as a result of proper O&M, and, if not, why?	X				Permittee rated overall condition as good as noted through televising activities
27. Are inspections documented, and, if so, does documentation include:	X				Check sheets are kept in each of the lift stations; CSO inspection forms are submitted to the City during wet weather – dry weather inspection information should be added to these sheets
a. Results of various types of inspections,	X				
b. Dates and times, and	X				
c. Corrective action taken if problems found?	X				
28. Is a log book of maintenance and repair on the sewer system and CSO structures maintained, and, if so, does the log book contain:	X				Documented through an Access-based active work order database system
✔ CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
a. Identification of type of problems like collapsed and blocked sewers, basement backups, street flooding... (or indicate routine maintenance),	X				
b. Repair made (or maintenance activity conducted), and	X				
c. Time and date?	X				

U.S. EPA	REGION 5 CSO INSPECTION CHECKLIST				PAGE __ OF __
RECORDS					
29. Has the maintenance program been effective in reducing or eliminating recurring sewer line or lift station problems as indicated in maintenance records? Give examples.	X				
30. Are flow records kept for each lift station?	X				
31. Are the following records kept for each CSO location:					
a. Discharge frequency,	X				
b. Flow magnitude (volume),	X	X			Not required by the permit: 004 (just upstream of the POTW) is metered
c. Pollutant characterization,		X			Not required by the permit
d. Correlation with rainfall records,	X				
e. Specific causes of overflows,	X				Specific causes are only recorded if they are attributed to causes other than wet weather
f. Flow collected/flow diverted and	X				
g. Flow records of overflows and flow records of receiving streams?	X	X			Flow records for the receiving stream are not maintained
32. Are records of collapsed and blocked sewers maintained?	X				
33. Are records of CSO control facilities (e.g., excess flow retention basin levels) maintained?	X				002 (EQ Basin overflow) is metered
✔CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:

34. Does the facility keep specific records on DWOs, SSOs and/or plant bypasses, and are they properly reported on the MORs and/or DMRs?	X				
COMPLIANCE SCHEDULES					
35. Is the facility meeting the terms and conditions of a compliance schedule, as a result of an enforcement action, to correct sewers, CSOs, SSOs, DWOs, and/or bypassing? If no, describe.			X		Handled through the NPDES permit
36. Is the facility meeting the compliance schedules established in the CSO Section of the facility's NPDES permit?	X				- Upper Hocking WPCF → under construction and on schedule - Lake/Allen/Maple Separation → completed ahead of schedule (2/29/2008), majority of new sanitary, flow meters installed to monitor degree of I/I
37. Does a permit or enforcement agreement require implementation of each of the nine minimum controls?	X				Part II, Item F of the NPDES permit
38. Has documentation on the implementation of the nine minimum controls been submitted?	X				Addressed in the 1998 CSSOP update
39. Is the facility implementing the nine minimum controls as follows:					
a. Proper operation and regular maintenance programs for the sewer system and CSOs,	X				Updating sewer maps, routine sewer televising and cleaning, routine inspections
b. Maximum use of the collection system for storage,	X				Maximized weir heights; closure of CSOs susceptible to backflow
c. Review and modification of pretreatment requirements to assure CSO impacts are minimized,	X				Permittee implements an approved pretreatment program; multiple industrial closures are expected to necessitate additional rate increases to compensate for lost revenues.
d. Maximize flow to the WWTP for treatment,	X				

e. Prohibition of CSOs during dry weather,	X				semi-weekly inspections
f. Control of solid and floatable materials in CSOs,	X				Street cleaning, vactor truck operation
g. Pollution prevention,	X				Sewer use ordinance; anti-litter laws
h. Public notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts, and	X				Signs installed at all outfalls Bill stuffers Information posted on City's website Monthly newspaper articles
i. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls?	X				Monitoring in accordance with their NPDES permit.
✔CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
40. Has the facility developed (or is developing) a Long Term Control Plan (LTCP)?	X				Schedule of Phase I projects included in NPDES permit
41. Is the facility implementing the LTCP?	X				Constructing a new (additional) POTW, express sewers, separation projects, a new EQ basin (2 MG) at the POTW – working to reduce overflows to four (4) or less during a typical year.
42. Has the permittee requested an extension of time?		X			