



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Notice of Violation
Allen County
American II WWTP
Ohio EPA Permit No. 2PH00006
NPDES Permit No. OH0037338

February 12, 2009

Mr. Jeffrey Mathew, Superintendent
American II WWTP
4140 Diller Road
Lima, Ohio 45807

Dear Mr. Mathew:

We are in receipt of your discharge monitoring reports (DMRs) covering the months of November 2008, to December 2008, for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are as follows:

| Violation Date | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value |
|----------------|---------|----------------|------------------------|------------|-------|----------------|
| 11/1/2008 | 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 19.8 |
| 11/1/2008 | 001 | 00530 | Total Suspended Solids | 7D Conc | 18 | 41.1 |
| 11/8/2008 | 001 | 00530 | Total Suspended Solids | 7D Conc | 18 | 24.5 |

We have reviewed your report addressing the reasons for the above violations and the actions being taken to prevent further occurrences. Hopefully, these actions will prevent any recurrence so that enforcement action will not be required. No additional information is requested at this time.

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in your Part III-General conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner.

Mr. Jeffrey Mathew, Superintendent
February 12, 2009
Page 2

You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. Information about Ohio EPA's Office of Compliance Assistance & Pollution Prevention can be found on Ohio EPA's Website at <http://www.epa.state.oh.us/ocapp/ocapp.html> or by calling (614) 644-3469.

If there are any questions, please contact this office.

Sincerely,



Thomas Poffenbarger, P.E.
District Engineer
Division of Surface Water

/llr

[\(pc: DSW-NWDO:File\)](#)



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ALLEN

AMERICAN NO 2 WWTP

2PH00006 2009/03/17

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Ted Strickland, Governor
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Re: Allen County
American II WWTP
NPDES Permit

March 16, 2009

Allen County Board of Commissioners
P. O. Box 1243
Lima, Ohio 45802

Dear Commissioners:

On March 4, 2009, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the American II wastewater treatment plant (WWTP). The new plant became operational on April 8, 2008. Mr. Jeff Mathew and Mr. Mike Santaguida were present and provided information on plant operation and maintenance. Our inspection included an interview with completion of the enclosed inspection checklist and a tour of the plant.

During our visit, all major treatment units were in operation. The final effluent discharge, tributary to Dug Run, was initially very turbid and brown in color during the beginning of the decant cycle; the effluent became clear after several minutes of discharge. Mr. Mathew indicated that the poor initial effluent quality is believed to be caused by residual material remaining in the system from the end of the previous decant cycle and is related to settleability problems in the WWTP. No samples were taken to verify compliance with permit limits.

Since plant start-up, eleven NPDES permit violations have been reported. Most of the violations have been related to settleability problems. Mr. Mathew indicated that the County has been working with consulting and process engineers continuously in an effort to improve treatment. We recommend that this coordination continue until plant operations are optimized.

Our completed inspection checklist is enclosed for your records. If you have any questions, please call Mr. Tom Poffenbarger at (419) 373-3008.

Yours truly,

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

TP/llr

pc: Mr. Jeffrey Mathew, Superintendent, American II WWTP w/enclosure
Mr. Stephen M. Kayatin, P.E., Allen County Sanitary Engineer w/enclosure
CDSW-NWDO File w/enclosure

Permit #: 2PH00006
 NPDES #: OH0037338



State of Ohio Environmental Protection Agency
 Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding

| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
|----------|-----------|----------------|-----------------|-----------|---------------|
| 2PH00006 | OH0037338 | 3/4/2009 | C | S | 1 |

Section B: Facility Data

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------------------------|------------------------|
| American II WWTP 4140 Diller Road Lima, Ohio 45807 | 10:00 AM | 9/1/2006 |
| | Exit Time | Permit Expiration Date |
| | 11:30 AM | 8/31/2011 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Mr. Jeffrey Mathew, Superintendent Mr. Mike Santaguida, Chief Operator | 419-222-9171 419-222-9171 | |
| Name, Address and Title of Responsible Official | Phone Number | |
| Allen County Commissioners P.O. Box 1243 Lima, Ohio 45802 | 419-228-3700 | |

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

Section D: Summary of Findings (Attach additional sheets if necessary)

The new WWTP began receiving flow on April 8, 2008.

Eleven NPDES permit violations have been reported since operation of the new plant was initiated.

Final effluent discharge was very turbid and brown in color at beginning of decant; the effluent turned clear after several minutes. The poor quality effluent is believed to be related to poor settling during previous decant and caused by residual material remaining in the decant piping.

Inspector _____ **Reviewer** _____

| | |
|--|---|
| <i>Thomas Poffenbarger</i> 3/9/09 | <i>Elizabeth A. Wick</i> 3/13/09 |
| Thomas Poffenbarger, P.E. District Engineer Division of Surface Water Northwest District Office | Elizabeth A. Wick, P.E. Water Quality Engineer Division of Surface Water Northwest District Office |

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:

(e) New WWTP was constructed.

Section F: Compliance Schedules/Violations

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... Y

Comments/Status:

(a) Eleven NPDES permit violations since plant start-up (NH3 - April 08, Phosphorus - July 08, TSS - August 08, September 08 and November 08)

(b) Working with consultant and manufacturer to address violations and normalize plant operations.

(c) Construction Schedule (complete) Mercury Variance Schedule (notification is due June 1, 2010).

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)..... III
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: III
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (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..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

Record Keeping:

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

| |
|-----------------------------------|
| Hard bound book and computer logs |
|-----------------------------------|
- (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

Section G: Operation & Maintenance (con t)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (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..... N
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: _____ Approval #: _____ Not submitted N/A

- (b) Sludge management plan current..... N/A
- (c) Sludge adequately disposed..... Y
(Method: Land Application and hauling to another NPDES permit holder)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name: Hauled sludge was contracted to MSI)
- (f) Has amount of sludge generated changed significantly since
last inspection..... Y
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... Y
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... Y
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

(a) Sludge requirements are in NPDES permit.

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: Magmeter)

- (b) Calibration frequency adequate Y
(Date of last calibration: March 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:

(b) Flows calculated from SBR levels, effluent and influent are compared regularly.

Section I: Self-Monitoring Program (con't)

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
- Parameters analyzed by commercial lab: Currently all parameters except dissolved oxygen, pH and phosphorus.

Lab name: Alloway

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:

Comments/Status:

Section J: Effluent/Receiving Water Observations

| Outfall Number | Oil sheen | Grease | Turbidity | Visible Foam | Visible Floating Solids | Color | Other |
|----------------|-----------|--------|-----------|---------------|-------------------------|---------------|-------|
| 001 | none | none | high-low | slight amount | none | brown - clear | |
| | | | | | | | |
| | | | | | | | |
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| | | | | | | | |

Comments/Status:

Final effluent discharge was very turbid and brown in color at beginning of decant; the effluent turned clear after several minutes. The poor quality effluent was believed to be related to poor settling during previous decant and caused by residual material remaining in the decant piping.

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:

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

| CONDITION OR APPEARANCE | | RATING | COMMENTS |
|-------------------------|-----------------------------------|--------|--|
| General | Grounds | S | |
| | Buildings | S | |
| | Potable Water Supply Protection | IN | Break Tank |
| | Safety Features | S | Fence surrounding plant, Security cameras |
| | Bypasses | -- | |
| | Storm Water Overflows | -- | |
| | Alternate Power Source | S | Generator |
| Preliminary | Maintenance of Collection Systems | S | |
| | Pump Station | IN | 4 Influent pumps |
| | Ventilation | -- | |
| | Bar Screen | OUT | On comminutor overflow |
| | Disposal of Screenings | S | landfilled |
| | Comminutor | IN | 2 units |
| | Grit Chamber | IN | |
| | Disposal of Grit | S | |
| Primary | Settling Tanks | -- | |
| | Scum Removal | -- | |
| | Sludge Removal | -- | |
| | Effluent | -- | |
| Sludge Disposal | Digesters | IN | 2 Digesters almost full |
| | Sludge Storage Tank | IN | 1 Unit 1/4 full |
| | Drum Screen | IN | Screens MLSS |
| | Disposal of Screenings | S | Pressed and sent to landfill |
| | Sludge Pumps | IN | 2 Sludge transfer, 2 RAS, 2 Cannibal feed |
| | Grit Separator | IN | 1 Unit |
| | Grit Separator pump | IN | |
| | Disposal of Sludge | S | Land application or hauling to another NPDES permit holder |
| Other | Flow Meter and Recorder | IN | Influent and effluent |
| | Records | S | |
| | Lab Controls | S | |
| | Chemical Treatment | IN | Alum addition as necessary |
| Secondary - Tertiary | Sequencing Batch Reactor #1 | IN | mix/fill mode changed to aeration mode |
| | Sequencing Batch Reactor #2 | IN | settling changed to decant |
| | Interchange Tank #1 | IN | Cannibal system |
| | Interchange Tank #2 | IN | Cannibal system |
| | Post Aeration | IN | |
| Disinfection | Effluent | M | Turbid & Brown to Clear |
| | Disinfection System | OUT | Ultraviolet in summer only |
| | Effective Dosage | -- | |
| | Contact Time | -- | |
| | Contact Tank | -- | |
| | Dechlorination | -- | |