



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
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: Allen County
Village of Bluffton
NPDES Permit

April 2, 2009

Mayor and Council
Village of Bluffton
154 N. Main Street
P.O. Box 63
Bluffton, Ohio 45817

Dear Mayor and Council:

On March 17, 2009, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Village of Bluffton Wastewater Treatment Plant. Mr. Dan Bowden and Mr. John Bowers were present and provided information on operation and maintenance of the wastewater treatment plant and collection system. Our visit included an interview with completion of the enclosed inspection checklist and observation of the wastewater treatment plant and the one remaining combined sewer overflow (CSO).

During our visit, all treatment units were in service. The aeration tanks had accumulations of light brown foam on the surface (a possible indicator that increased sludge wasting is necessary). The contents of the clarifiers were turbid. The weirs and effluent troughs needed cleaned. The final effluent discharging to Riley Creek was slightly turbid. However, no samples were collected to verify compliance with NPDES permit limits.

Numerous effluent (pH) violations were reported in November and December 2008. Mr. Bowden indicated that these violations were related to the Village switching water supply (to the Village of Ottawa water). This switch required the Village to drastically reduce the alum feed rate at the WWTP. Since the feed rate was adjusted, pH levels have normalized, returning the Village to compliance with permit limits.

The Schedule of Compliance outlined in your NPDES permit, based on your General Plan of Improvements for CSO Elimination approved January 16, 1996, required all CSOs to be eliminated by September 30, 2007. One CSO remains on the collection system. Mr. Bowers explained that a pneumatic "test ball" type plug was installed in the effluent pipe of the Riley and Spring Street CSO (Station # 2PC00005021). Plans are to eliminate the CSO in conjunction with replacement of the West Side Interceptor sewer.

The compliance schedule also requires written status reports on CSO elimination to be submitted every six months, beginning six months (March 1, 2007) after the effective date of this permit. To date, only one status report was received on December 3, 2007.

Mayor and Council
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Please ensure that these status reports are submitted in March and September each year until all CSOs are permanently eliminated.

On November 24, 2008, Proposed Director's Final Findings and Orders (DFFOs) were issued to the Village, to address violations of Ohio's Water Pollution Control Laws. On December 18, 2008, we received a preliminary response to the proposed DFFOs from your counsel, Mr. F. Stephen Chamberlain. This letter states "the Village will need an additional 45 days to investigate these matters and will provide a more formal response at that time". We have no record of receiving this formal response. Please contact Mr. Pete Simcic of our legal staff at (614) 644-3037, to further address the proposed DFFOs.

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

Yours truly,



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

TP/llr

Enclosure

pc: Mr. Pete Simcic, Legal
Mr. Larry Reeder, DSW, CO
(DSW-NWDO File w/enclosure_)

Permit #: 2PC00005
 NPDES #: OH0020851



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
2PC00005	OH0020851	3/17/2009	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Bluffton Wastewater Treatment Plant 450 North Spring Street Bluffton, Ohio 45817	9:30 AM	9/1/2006
	Exit Time	Permit Expiration Date
	11:05 AM	7/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Dan Bowden, Superintendent Mr. John Bowers, Service Employee	419-358-2056 419-358-2016	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council Village of Bluffton 154 N. Main Street, P.O. Box 63 Bluffton, Ohio 45817	419-358-2066	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
U	Collection System				

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

Effluent being discharged to Riley Creek was slightly turbid.

Schedule of compliance required all CSOs to be eliminated by September 30, 2007; CSO status reports to be submitted every six months (one has been received).

The Riley and Spring Street CSO (Station # 2PC00005021) remains temporarily plugged with a pneumatic "test ball" device. Plans are to eliminate this overflow during the West Side Interceptor replacement project.

Inspector	Reviewer
<i>Thomas Poffenbarger</i> 3/25/09	<i>Elizabeth A. Wick</i> 3/31/09
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 | N |
| (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..... | N |
| (g) Notification given to State of new, different or increased discharges..... | N/A |
| (h) All discharges are permitted..... | Y |
| (i) Number and location of discharge points are as described in permit..... | Y |

Comments/Status:

(a) Facility mailing address has changed to 154 N. Main Street

Section F: Compliance Schedules/Violations

- | | |
|---|--------------|
| (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 | NPDES Permit |
| (e) Permittee is meeting compliance schedule..... | N |

Comments/Status:

(a) 17 effluent violation (15 pH - Nov & Dec 08; 2 Copper - Nov. 08) have been reported since the last inspection.
(b) pH violations have ben resolved with alum feed adjustments.
(d) Schedule of compliance required all CSOs to be eliminated by September 30, 2007 - (the Jefferson Street CSO has been eliminated); CSO status reports to be submitted every six months (none have been received).

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
- (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..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (d) CSO O&M plan provided and implemented..... N
- (e) CSOs monitored and reported in accordance with permit..... Y
- (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 Y
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

(d) Village does not have a CSO O&M plan, Nine minimum controls are required by NPDES permit

(e) CSOs are monitored weekly and during significant rainfall events.

(g) Visual alarms are provided on lift stations.

(h) Lift stations are equipped with portable generator hookups

(j) Some sewer back-ups occurred in lower apartments on Elm Street.

(k) Not during dry weather

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 Applied)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name: Soil Tech)
- (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..... Y
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

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: August 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..... N
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

(b) A new flow meter was installed in August 2008.

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. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: All parameters except pH and dissolved oxygen

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:

(i) Values for arsenic and selenium were unacceptable for DMRQA #27 (2007), resubmitted test results were acceptable.

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	none	none	slight	none	none	clear	

Comments/Status:

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:

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	--	
	Safety Features	S	Fence Surrounding Plant
	Bypasses	--	
	Storm Water Overflows	--	
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	3 Raw Wastewater Pumps (variable speed)
	Ventilation	S	
	Bar Screen	IN	Mechanically cleaned fine bar screen
	Disposal of Screenings	S	Landfilled
	Comminutor	--	
	Grit Chamber	IN	Vortex Grit Removal System
	Disposal of Grit	S	Landfilled
	Screen Basket	OUT	Used as a back-up unit if bar screen is out of operation
Primary	Settling Tanks	--	
	Scum Removal	--	
	Sludge Removal	--	
	Effluent	--	
Sludge Disposal	Digesters	IN	Aerobic (2 Units); one full, one almost full
	Temperature and pH	--	
	Gas Production	--	
	Heating Equipment	--	
	Sludge Pumps	IN	2 RAS/WAS ; 1 transfer pump
	Drying Beds	OUT	2 Beds
	Vacuum Filter	--	
	Disposal of Sludge	S	Land Applied
	Belt Press	IN	Operated approximately 2 weeks 6 times per year
Sludge Storage	IN		
Other	Flow Meter and Recorder	IN	Electromagnetic on influent
	Records	--	
	Lab Controls	--	
	Chemical Treatment	IN	Polymer for sludge dewatering ; Alum for phosphorus removal
Secondary - Tertiary	Aeration Basins	IN	2 Units; Light brown foam on surface
	Secondary Clarifiers	IN	2 Units; Turbid, solids and algae on weirs
	Post Aeration	IN	2 Units
Disinfection	Effluent	S	slightly turbid
	Disinfection System	OUT	Ultraviolet (2 Units)
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
	Dechlorination	--	