



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: Allen County  
Delphos WWTP  
NPDES Permit

June 12, 2008

Mayor and Council  
City of Delphos  
608 N. Canal Street  
Delphos, Ohio 45833

Dear Mayor and Council:

On April 22, 2008, National Pollutant Discharge Elimination System (NPDES) permit and Pretreatment compliance inspections were conducted at the City of Delphos Wastewater Treatment Plant. Ms. Kim Riddell was present and provided information on operation and maintenance of the wastewater plant and implementation of the pretreatment program. The inspection included completion of the enclosed NPDES and pretreatment compliance inspection reports, observation of the wastewater treatment plant and review of the industrial user files for Bunge North America.

**NPDES Permit Compliance**

During our visit, all major treatment units were in operation. The final effluent discharging to Jennings Creek was clear. However, no samples were taken to verify compliance with permit limits. Plant operations and maintenance were satisfactory.

Several effluent violations have been reported since our last inspection. Ms. Riddell anticipated that these violations will not reoccur with the construction repairs made to the wastewater treatment plant during 2007. Actions are also being taken to resolve pH and dissolved oxygen violations that are believed to be related to faulty probes and meter calibration.

As discussed, your NPDES permit requires an outfall sign to be posted at the final effluent discharge location at Jennings Creek by July 1, 2008. A letter outlining the City's plan to come into compliance with the final effluent limits for bis(2-ethylhexyl) Phthalate is due by September 1, 2008.

**Pretreatment Compliance**

Interview and Checklist

A program modification request (for streamlining rules) is currently pending review in Ohio EPA, Central Office. Technical justification for local limits is due by November 1, 2008. The City's Sewer Use Ordinance gives you the resources and authority to effectively operate your pretreatment program.

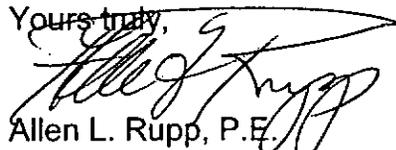
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File Review

The Bunge North America industrial user files were reviewed during the inspection. The files were well organized and contained all required information.

Copies of our completed inspection reports are enclosed for your records. If you have any questions, please call Tom Poffenbarger at (419) 373-3008.

Yours truly,



Allen L. Rupp, P.E.  
District Engineer/Section Manager  
Division of Surface Water

TP/lr

Enclosures

pc: Ms. Kim Riddell, City of Delphos w/enclosures  
Ms. Julia Zhang, DSW-CO w/enclosures  
DSW-NWDO File w/enclosures

Permit # : 2PD00029  
 NPDES #: OH0024929



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
2PD00029	OH0024929	4/22/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Delphos Wastewater Treatment Plant 24793 Pohlman Road Delphos, Ohio, Van Wert County	9:30 AM	3/1/2008
	Exit Time	Permit Expiration Date
	11:40 AM	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ms. Kimberly Riddell, Superintendent	419-692-0991	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council, City of Delphos 608 N. Canal St. Delphos, Ohio 45833	419-695-4010	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Effluent discharge to Jennings Creek was clear.	
<b>Inspector</b>	<b>Reviewer</b>
<i>Thomas Poffenbarger</i> 5/2/08	<i>Elizabeth A. Wick</i> 5/27/08
Thomas Poffenbarger, P.E. Date District Engineer Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Date 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)..... Y
- (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..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

**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 NPDES Permit
- (e) Permittee is meeting compliance schedule..... Y

Comments/Status:

- (a) D.O. - June and October 2007  
Ammonia & Phosphorus - August and September 2007  
Silver & pH - December 2007
- (b) Actions are being taken to resolve violations
- (c) Letter on BEHP compliance is due September 1, 2008  
Technical justification for local limits is due November 1, 2008  
Streamlining Rule program modifications are due November 1, 2008  
Outfall signs must be posted by July 1, 2008 (Part II, Item W.)

**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..... N

**Record Keeping:**

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

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: 70%
- (b) Any collection system overflows since last inspection..... Y  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... Y
- (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:**

**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)  
(d) If sludge is incinerated, where is ash disposed of  
(e) Is sludge disposal contracted..... Y  
(Name:LSI Farms, Inc.)  
(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..... N/A  
(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:Magmeter)
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration: 10/2006)
- (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:**

**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..... N/A
  - (c) Analyses being performed more frequently than required by permit. N
  - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
  - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: All except CBOD, TSS and fecal coliform

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	clear	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 WWTP
	Bypasses	--	
	Storm water Overflows	--	
	Alternate Power Source	S	4 Generators
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	5 Influent pumps
	Ventilation	S	
	Bar Screen	IN	Prior to influent pumps (mechanical w/manual bypass channel)
	Disposal of Screenings	S	Landfill
	Fine Screen	IN	2 Fine screen units
	Grit/Grease Removal	IN	1 Aerated tank
	Disposal of Grit/Grease	S	Landfill
	Muffin Monster	IN	On septage receiving line
Primary	Settling Tanks	--	
	Scum Removal	--	
	Sludge Removal	--	
	Effluent	--	
Sludge Disposal	Digesters	IN	2 ATAD Reactors
	Belt Thickener / Belt Filter Presses	IN	2 Units (1 operated as press & 1 operated as thickener)
	ATAD Storage	IN	1 Tank
	Dry Cake Storage	IN	1 Building
	Sludge Pumps	IN	2 WAS, 2 Thickened, 2 Digested, 3 Recycle, 3 Foam transfer
Other	Flow Meter and Recorder	IN	Magmeter
	Records	S	
	Lab Controls	S	
	Chemical Treatment	IN	Alum added
Secondary - Tertiary	Membrane Biological Reactors	IN	5 Trains
	Anoxic Basins	IN	5 Units
	Pre-Aeration Basins	IN	5 Units
	Aeration Basins	IN	5 Units
	Permeate Pumps	IN	5 Units
Disinfection	Effluent	S	
	Disinfection System	OUT	Ultraviolet - Summer only
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
	Dechlorination	--	
	Post Aeration	IN	