



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

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

Re: Allen County
Delphos WWTP
NPDES Permit

May 26, 2010

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

Dear Mayor and Council:

On May 11, 2010, a National Pollutant Discharge Elimination System (NPDES) permit compliance/combined sewer overflow (CSO) inspection was conducted at the City of Delphos Wastewater Treatment Plant. Ms. Kim Riddell and Mr. Todd Teman were present and provided information on operation and maintenance of the plant. The inspection included completion of the enclosed NPDES Compliance Inspection Report, observation of the diversion chamber CSO and observation of the wastewater treatment plant. This letter and report cover the NPDES permit compliance and wastewater treatment plant portions of the inspection. A separate inspection report and letter, from Mr. Dan Gill of our Central Office, will follow addressing CSO compliance issues.

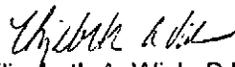
During our visit, all major treatment units were in operation. The final effluent discharging to Jennings Creek was clear. No samples were taken to verify compliance with permit limits. There was no discharge from the influent diversion chamber CSO.

Ammonia violations have been reported several times in the past year. The most recent ammonia violations occurred during March and April 2010. Ms. Riddell indicated that these violations were related to the failure of the six blowers serving the membrane bioreactor (MBR) system. Installation of the six replacement turbo blowers was completed in April 2010. Compliance with NPDES permit limits has been achieved since completion.

Our inspection included a review of the Log Book being maintained to comply with the Operator Certification Rules. As discussed, the log book must include the dates and times of arrival and departure for the operator(s) of record. The log book must also contain the name or initials of the person making log entries. The records must be kept up to date, contain a minimum of three months data at all times, and be maintained for at least three years.

If you have any questions, please call Tom Poffenbarger at (419)373-3008.

Yours truly,


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

TP/cs
Enclosure
pc: Ms. Kim Riddell, City of Delphos w/enclosure
Mr. Dan Gill, DSW-CO w/enclosure
~~D:SW:NWDO:File w/enclosure~~



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NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PD00029	OH0024929	5/11/10	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Delphos WWTP 24793 Pohlman Road Delphos, Ohio 45833	10:30 AM	February 1, 2008
	Exit Time 1:20 PM	Permit Expiration Date July 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ms. Kim Riddell, Superintendent Mr. Todd Teman, Asst. Superintendent	419-692-0991	
Name, Address and Title of Responsible Official	Phone Number	
Mayor & Council, City of Delphos 608 North Canal Street Delphos, Ohio 45833	419-695-4010	

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

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

Final effluent discharging to Jennings Creek was clear.

There was no discharge from the diversion chamber CSO.

All six blowers for the MBRs failed, prior to the new turbo blowers being installed in April 2010.

Ammonia violations were reported in April 2009, May 2009, June 2009, March 2010 and April 2010.

Log book must identify the person making log entries and show daily times of arrival and departure of operator(s) of record.

Inspector	Reviewer
<i>Thomas Poffenbarger</i> 5/18/10	<i>Elizabeth A. Wick</i> 5/24/10
Thomas Poffenbarger, P.E. District Engineer Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Water Quality Engineer/Unit Supervisor Division of Surface Water Northwest District Engineer

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..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

(f) Six new blowers were installed to serve the MBR system.

Section F: Compliance

- (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) Ammonia - April 2009, May 2009, June 2009, March 2010
Chronic Toxicity - July 2009
(b) Optimizing Symbio process; installed new blowers; worked with SIU to decrease loadings to ATAD.
(e) CSO LTCP Evaluation Report is due on February 1, 2012.

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: IV
- (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..... Y
- (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..... N
 - 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..... N
- (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 H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... Y
(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:Farmers and residents)
(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..... Y
(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: About a year ago)
(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 (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
(see GLC page 5 and 8)
- (d) 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

Laboratory:

General

- (a) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite Y
- (b) Do SOP's include the following if applicable: ✓ means was found in SOP for ammonia.

- Title✓
- Scope and Application
- Summary✓
- Sample Handling and Preservation
- Interferences✓
- Apparatus and Materials✓
- Reagents
- Procedure✓
- Calculations
- Quality Control✓
- Maintenance✓
- Corrective Action✓
- Reference (Parent Method)✓

- (c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
Date:

- (j) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab: Ammonia, Phosphorus, Oil & Grease,
 Metals, bioassay, sludge, mercury.

Lab name: Alloway Environmental Testing

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	none	none	None	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 /SNDR	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	Clear
	Disinfection System	IN	Ultraviolet - Summer only
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
	Dechlorination	--	
	Post Aeration	IN	