



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.ohio.gov

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

Re: **Notice of Violation**
Allen County
City of Lima WWTP
NPDES Permit

November 23, 2009

Mayor and Council
City of Lima
50 Town Square
Lima, Ohio 45801

Dear Mayor and Council:

On October 20, 2009, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Lima wastewater treatment plant (WWTP). Mr. David Schnipke, Mr. Russell Bales, Mr. Wade Leimeister and Mr. Steve Ford were present and provided information on operation and maintenance of the plant. The inspection included completion of the enclosed NPDES Compliance Inspection Report and observation of the wastewater treatment plant.

During our visit, all major treatment units were in operation. The final effluent discharging to the Ottawa River was clear. However, no samples were taken to verify compliance with permit limits.

Your NPDES permit Schedule of Compliance required an updated CSO Long Term Control Plan (LTCP) to be submitted by January 1, 2008. Your staff indicated that the City has submitted Chapters 1 to 6 of the LTCP to US EPA. They stated that the final plan, which will have eleven chapters, is expected to be submitted in March or April 2010. None of the updated plan has been submitted to our office despite repeated written requests outlined in inspection letters dated November 5, 2008; April 16, 2008; February 23, 2007; and February 2, 2006. **Failure to comply with these requests is a violation of the Duty to Provide Information section outlined in Part III, Item 9. of your NPDES permit.**

On October 8, 2009, your staff reported an unauthorized discharge from the Lover's Lane combined sewer overflow structure, due to failure of a stem nut on the sewer gate drive assembly. The follow-up report received on October 9, 2009, indicates that the dry weather overflow into the Ottawa River lasted 13.75 hours with a total calculated discharge of 253,000 gallons. During the inspection, we requested information regarding the reasons why this overflow lasted for over 13 hours, when the control structure is tied into the SCADA system at the WWTP.

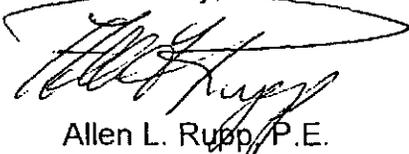
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Your staff indicated that the SCADA system at the WWTP did indicate surcharged conditions; however the system is not programmed to alert the on-duty operator of the problem while they are monitoring the overall system screen. A similar incident occurred on June 26, 2009 due to a failure at a lift station, which allowed 62,400 gallons of untreated sewage to discharge into Pike Run. The follow-up report for the June incident indicated that your Data Systems staff is exploring ways to make alarm situations more visible on the SCADA system. Immediate changes should be made to ensure that failures such as these two incidents are detected sooner.

Please inform this office in writing, within 30 days, as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

We continue to request that you copy our office on all new/updated documents and plans that are sent to U.S. EPA regarding CSO controls and SSO elimination. It will not be necessary to send additional copies of documents that have already been submitted in the past. Our completed inspection checklist is 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/csl

Enclosure

pc: Mr. Dave Schnipke, Lima, w/enclosure
Mr. Russell Bales, Lima WWTP, w/enclosure
DSW-NWDO File w/enclosure

Permit #: 2PE00000
 NPDES #: OH0026069



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
2PE00000	OH0026069	10/20/2009	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Lima WWTP 1200 Ft. Amanda Road Lima, Ohio 45804	10:00 AM	1/1/2008
	Exit Time	Permit Expiration Date
	11:50 AM	10/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
David L. Schnipke, Environmental Compliance Manager	419-221-5294	
Russell C. Bales, WWTP Supervisor	419-221-5191	
Steve Ford, Tech. Supervisor, Jones & Henry Engineers	419-473-9611	
Wade Leimeister, Industrial Monitoring, Lab Chief	419-221-5190	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council City of Lima 50 Town Square Lima, Ohio 45801	419-221-5294	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Pretreatment
U	Records/Reports	S	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
U	Collection System				

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

Final effluent was clear.

An updated Long Term Control Plan was due January 1, 2008. The City intends to submit the plan in accordance with a proposed USEPA enforcement action.

An unauthorized discharge from the Lovers Lane CSO Control Structure occurred on October 8, 2009.

Inspector Reviewer

<i>Thomas Poffenberger</i> 11/3/09	<i>Elizabeth A. Wick</i> 11/6/09
Thomas Poffenberger, 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)..... 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..... 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..... N

Comments/Status:

(a) Chlorine Residual - July 2009, Phosphorus - August 2009 (frequency)
(e) LTCP update was due January 1, 2008, Chapters 1-6 of 11 total have been submitted to US EPA. The full plan is expected to be submitted in March or April 2010. None of the plan has been submitted to our office despite repeated written requests outlined in inspection letters dated November 5, 2008; April 16, 2008; February 23, 2007; and February 2, 2006.

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)..... IV
- (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..... 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)

Computerized maintenance log and hard bound record 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: 60%
- (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..... Y
- (e) CSOs monitored and reported in accordance with permit..... Y
- (f) Portable pumps used to relieve system..... Y
- (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..... Y
- (j) Any complaints received since last inspection of basement flooding Y
- (k) Are any portions of the sewer system at or near capacity..... Y

Comments/Status:

- (g) The City's lift stations and control structures are connected into the SCADA system; however, alarm situations are not easily detected while observing the overall system screen on the system.
- (i) The City has a water in basement program to install check valves or redo plumbing in houses to minimize homes that have problems.
- (j) During wet weather but none 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:Marketing)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... Y
(Name: Wright Mulch)
(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:

(a) Sludge management requirements are in NPDES permit.
(e) Wright Mulch removes all sludge from the facility.

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: venturimeter)
- (b) Calibration frequency adequate Y
(Date of last calibration: 9/29/2009)
(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
- (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
 - (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: metals, oil & grease, cyanide
TKN, priority pollutants, sludge analysis
Lab name: Ginosko, Alloway (bioassay), Pace Analytical (dioxins)

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	
	Bypasses	OUT	Plant Bypass, Secondary Bypass, Tertiary Bypass
	Storm Water Overflows	-	
	Alternate Power Source	S	Three Generators (two for plant & one for computer system)
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	--	
	Ventilation	--	
	Bar Screen	IN	3 Mechanically Cleaned, 1 Manually Cleaned (out)
	Disposal of Screenings	S	Landfilled
	Comminutor	--	
	Grit Chamber	IN	2 Units
	Disposal of Grit	S	Landfilled
	Chemical Addition	IN	Ferrous Chloride added after bar screens
	Chemical Addition	IN	Polymer added after grit chambers
Primary	Settling Tanks	IN	3 of 7 units in service
	Scum Removal	IN	To thickener
	Sludge Removal	IN	To digester
	Effluent	S	gray
Sludge Disposal	Digesters	IN	Anaerobic (2 Primary, 1 Secondary -- out for maintenance)
	Temperature and pH	S	
	Gas Production	IN	Used as fuel for 3 Micro-turbines and/or boilers
	Heating Equipment	IN	3 Boilers, 2 Heat exchangers
	Sludge Pumps	IN	3 RAS, 2 WAS, 2 Recirculation, 3 Thickened sludge transfer
	Class A Process	IN	Lime & Fly Ash added
	Belt Filter Press	IN	3 Units (2 in operation)
	Sludge Thickening	IN	2 Units
	Sludge Storage Tanks	IN	2 Units
	Microturbines	IN	3 Units
Other	Flow Meter and Recorder	IN	Venturimeter
	Records	S	
	Lab Controls	S	
	Chemical Treatment	--	
Secondary - Tertiary	Aeration Tanks	IN	5 Units, Good mixing and color
	Chemical Addition	IN	Polymer added before final clarifiers
	Final Clarifiers	IN	4 Units
	Nitrification Towers	IN	2 Units
Disinfection	Effluent	S	Clear
	Disinfection System	IN	Sodium Hypochlorite
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	IN	
	Dechlorination	IN	Sodium Bisulfite