



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

February 4, 2009

RE: LORAIN COUNTY
VILLAGE OF GRAFTON WWTP
COMPLIANCE EVALUATION INSPECTION
OHIO EPA NO. 3PB00024
(OH0025372)

Village of Grafton
Mayor and Council
1009 Chestnut Street
Grafton, OH 44044

Dear Mayor and Council:

On January 6, 2009, a Compliance Evaluation Inspection (CEI) was conducted at the Village of Grafton wastewater treatment plant (WWTP). Present during the inspection were Messrs. Hobart Wells, Jarrett Gott, and Chad Riffle, representing the Village of Grafton; Mr. John Sabo, of the Lorain County Health Department; and this writer.

The purpose of the inspection was to evaluate the overall operation and maintenance of the WWTP, as well as the facility's compliance with the effluent limits, terms, and conditions of its NPDES Permit. The last WWTP CEI inspection was conducted on December 20, 2007.

At the time of the inspection, the general operation and maintenance of the plant could be rated as satisfactory. All required treatment processes were in use, and effluent from the batch treatment process was being discharged. The effluent being discharged was clear, and free of foam and solids, and exhibited no visual impact upon the receiving stream. Ultra Violet (UV) disinfection was not being performed, but is not required, due to the time of year.

According to analytical data contained in the electronic Discharge Monitoring Reports (eDMR) submitted to the Ohio EPA since the last inspection (December 1, 2007 through December 1, 2008), the treatment plant has had the following numeric violations for the final effluent:

- a) The Village may have to install new bar screens at the head of the WWTP, with appropriately sized smaller spacings between bars, to capture the shredded material.
 - b) The Village may require the prison to eliminate the Muffin Monster (shredder) and use their mechanical barscreen as in the past.
 - c) The Village may require the prison to pretreat their wastewater on their own property before discharging to the Village WWTP.
 - d) The Village may surcharge the prison for the additional O&M labor or capital cost of any improvements needed at the Village WWTP.
 - e) As the NPDES Permit holder, the Village of Grafton is ultimately responsible for the quality of its effluent, and may take any actions necessary to ensure the quality of their effluent.
- 5) Sludge is fed to the two meter filter press approximately one day per week in the summer, and approximately two days per week in the winter. Liquid polymer is added to the sludge prior to pressing. The belt on the filter press was recently replaced.
- Sludge enters the filter press at approximately 1½ to 2% solids, and is pressed to a solids content of approximately 15 to 20%.
- 6) Pressed sludge is landfilled by Agri-Sludge, Inc. at the Kimble Landfill in Dover, Ohio (approx. 20 c.y. 3x/2 wks in the summer; 2 -3x/wk in the winter).
- Screenings from the mechanical bar screen (approx. 2 c.y./mo.) are put into a dumpster and then hauled to the BFI Landfill.
- 7) In March 2008, a Mercury Variance Request for the Village of Grafton WWTP was sent to the Ohio EPA by Poggemeyer Design Group. The variance request application was forwarded to Columbus for review and comment. A follow up on the current status of the mercury request will be made, and the Village will be informed on the status of the request in the near future.
- 8) A contracted outside laboratory (North Coast Labs) runs analysis on CBOD₅, Oil & Grease, Fecal Coliform, Total Kjeldahl Nitrogen, mercury, heavy metals, and nitrate-nitrite nitrogen. The Grafton WWTP laboratory runs analysis on pH, temperature, dissolved oxygen, total suspended solids, ammonia, phosphorus, and volatile solids.

- 9) The most recent DMRQA Study unknown sample analyses were run by the WWTP and contracted outside lab. All results came back within acceptable analytical limits.
- 10) Disinfection is performed by Ultra Violet light. At the time of the inspection the UV was not in operation. Effluent disinfection is required May 1st through October 31st. The UV system contains 16 UV lamps, which are automatically cleaned. The lamps are replaced every two years.
- 11) Effluent being discharged from the WWTP at the time of the inspection was clear, free of solids and foam, and caused no visible sign of impact upon the receiving stream.
- 12) Final effluent flow is measured at the end of the Ultra Violet disinfection channel. The raw flow meter was calibrated in May 2008.
- 13) There are three full time employees at the Grafton WWTP, with coverage Monday through Friday from 7 to 3:30. Coverage Saturday and Sunday is from 7 to 9. When the WWTP is unmanned, the WWTP is monitored by computers, and in the event of an emergency, the Verbatim System autodial a call down list of superintendent and operators until someone is reached.

One of the operators, Mr. Riffle, recently received his Class I Operators license.

- 14) Mr. Wells indicated the Village has eliminated land application of sludge, instead, preferring to landfill the sludge. In previous NPDES permits, reporting of sludge to the Ohio EPA was per Station 581 for land application, and Station 586 for landfilling of sludge.

Mr. Wells requested that Station 581, and its subsequent reporting requirements, be eliminated from the NPDES permit, keeping only Station 586. It has been determined that Station 581 has been eliminated from the hardcopy NPDES permit, but not in the SWIMS computer tracking of the sludge. The Northeast District Office will work with Columbus in eliminating the computer tracking of Station 581, as it is no longer required.

The Village of Grafton should continue their implementation the positive steps which enabled the WWTP to consistently meet its NPDES Permit limits.

VILLAGE OF GRAFTON WWTP
FEBRUARY 4, 2009
PAGE 5

If there are any questions or comments regarding the contents of the report or this letter, please contact me at (330) 963-1110.

Respectfully,

A handwritten signature in black ink that reads "Charles E. Allen". The signature is written in a cursive style with a large initial 'C' and 'A'.

Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA:bo