



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 30, 2008

RE: LORAIN COUNTY  
CITY OF OBERLIN WWTP  
COMPLIANCE ENFORCEMENT INSPECTION  
(OH0020427, 3PD00025)

Mr. Jeff Baumann, Public Works Director  
City of Oberlin  
Department of Public Works  
85 South Main Street  
Oberlin, OH 44074

Dear Mr. Baumann:

On January 10, 2008, a Compliance Enforcement Inspection (CEI) was conducted at the City of Oberlin WWTP. Present during the inspection were Mr. Steve Hoffert and Ms. CarrieAnn Rosemark, representing the City of Oberlin; Mr. John Sabo, of the Lorain County Health Department; and this writer. The purpose of the inspection was to evaluate the facility's compliance with NPDES Permit effluent limits, as well as the terms and conditions of the permit. Evaluated during the inspection were the treatment plant processes, effluent discharge quality, and general compliance with the intent of the permit. The last CEI was conducted on November 28, 2006.

At the time of the inspection all required treatment plant processes were in operation, with the exception of the disinfection facilities. Ultraviolet disinfection is not required during the winter season. General operation and maintenance of the plant could be rated as satisfactory at the time of the inspection. The effluent being discharged was clear, contained no visible solids or foam, and was causing no visible impact upon the stream at the time.

Observations made during the inspection included the following:

- 1) Due to heavy rains the prior day(s), both flow equalization basins were in use.
- 2) The aerated grit chamber contents were turbid gray in color (typical).
- 3) The old rectangular primary settling tank was not in use. The newer, circular primary settling tank was in use. Contents of the circular settling tank were turbid gray. The effluent trough was clean and free of solids and algae.
- 4) The WWTP was being operated in the contact / stabilization mode. One stabilization tank was being used, while the second stabilization tank was being used as an aerobic digester.
- 5) Two final settling tanks were in use. Contents of the final settling tanks were slightly turbid, and the weirs contained some algae growth. A slight pinfloc was present in the settling tanks.
- 6) The ammonia removal tower was in use, as were the rapid sand filters.
- 7) UV disinfection facilities were not in use, due to the time of year.

Mr. Jeff Baumann  
 City of Oberlin WWTP  
 January 30, 2008  
 Page 2

During the time period since our last inspection (November 1, 2006 through January 1, 2008), the Oberlin WWTP has reported the following NPDES Permit final effluent numerical violations in their monthly operating reports:

**CITY OF OBERLIN WWTP  
 NPDES EFFLUENT LIMIT VIOLATIONS  
 (November 1, 2006 through January 1, 2008)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	34	38.3720	1/15/2007
February 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	34	39.6250	2/22/2007
March 2007	Nitrogen, Ammonia (NH3-N)	30D Qty	23	33.1911	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	34	34.9155	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	7D Qty	34	44.5988	3/8/2007
August 2007	Mercury, Total (Low Level)	30D Conc	4.4	9.1	8/1/2007
September 2007	Mercury, Total (Low Level)	30D Conc	4.4	60.7	9/1/2007
September 2007	Mercury, Total (Low Level)	30D Qty	0.0	.00031	9/1/2007
September 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	3.0	3.617	9/22/2007
October 2007	Mercury, Total (Low Level)	30D Conc	4.4	36.	10/1/2007
October 2007	Mercury, Total (Low Level)	30D Qty	0.0	.00007	10/1/2007
December 2007	Mercury, Total (Low Level)	30D Conc	4.4	23.7	12/1/2007
December 2007	Mercury, Total (Low Level)	30D Qty	0.0	.00017	12/1/2007

Based upon MOR data submitted to Ohio EPA in SWIMS for the same period, there were some apparent violations of sampling and/or reporting frequencies for the following parameters:

**CITY OF OBERLIN WWTP  
 NPDES EFFLUENT FREQUENCY VIOLATIONS  
 (November 1, 2006 through January 1, 2008)**

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2007	601	Total Suspended Solids	3/Week	3	2	01/08/2007
January 2007	601	CBOD 5 day	3/Week	3	2	01/08/2007
January 2007	601	Total Suspended Solids	3/Week	3	2	01/22/2007
January 2007	601	CBOD 5 day	3/Week	3	2	01/22/2007
March 2007	001	Mercury, Total (Low Level)	1/Month	1	0	03/01/2007
April 2007	001	Fecal Coliform	3/Week	3	0	04/01/2007
April 2007	001	Fecal Coliform	3/Week	3	0	04/08/2007
April 2007	001	Fecal Coliform	3/Week	3	0	04/15/2007
April 2007	001	Fecal Coliform	3/Week	3	0	04/22/2007
June 2007	001	Oil and Grease, Total	1/2 Weeks	1	0	06/01/2007
June 2007	001	Fecal Coliform	3/Week	3	2	06/22/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/01/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/02/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/03/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/04/2007

Mr. Jeff Baumann  
 City of Oberlin WWTP  
 January 30, 2008  
 Page 3

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2007	602	Rainfall in Inches	1/Day	1	0	08/06/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/10/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/11/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/12/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/13/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/14/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/15/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/16/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/17/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/18/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/19/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/21/2007
August 2007	601	CBOD 5 day	3/Week	3	2	08/22/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/22/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/23/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/24/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/25/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/26/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/27/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/28/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/29/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/30/2007
August 2007	602	Rainfall in Inches	1/Day	1	0	08/31/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/01/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/02/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/03/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/04/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/05/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/06/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/07/2007
October 2007	601	Total Suspended Solids	3/Week	3	2	10/08/2007
October 2007	601	CBOD 5 day	3/Week	3	2	10/08/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/08/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/09/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/10/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/12/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/13/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/14/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/15/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/16/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/17/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/18/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/19/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/20/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/21/2007
October 2007	001	Total Suspended Solids	3/Week	3	2	10/22/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2007	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	10/22/2007
October 2007	001	CBOD 5 day	3/Week	3	2	10/22/2007
October 2007	001	Phosphorus, Total (P)	3/Week	3	2	10/22/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/24/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/28/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/29/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/30/2007
October 2007	602	Rainfall in Inches	1/Day	1	0	10/31/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/01/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/02/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/03/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/04/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/05/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/06/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/07/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/08/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/09/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/10/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/11/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/12/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/13/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/14/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/15/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/16/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/17/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/18/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/21/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/22/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/23/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/24/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/25/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/26/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/27/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/28/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/29/2007
November 2007	602	Rainfall in Inches	1/Day	1	0	11/30/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/01/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/02/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/03/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/04/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/05/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/06/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/07/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/08/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/09/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/10/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
December 2007	602	Rainfall in Inches	1/Day	1	0	12/11/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/12/2007
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December 2007	602	Rainfall in Inches	1/Day	1	0	12/17/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/18/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/19/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/20/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/21/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/23/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/24/2007
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December 2007	602	Rainfall in Inches	1/Day	1	0	12/26/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/27/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/28/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/29/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/30/2007
December 2007	602	Rainfall in Inches	1/Day	1	0	12/31/2007

**It is requested that a review of these apparent frequency violations be conducted, and a follow-up be made, in writing, to this office.**

Items discussed during the inspection were the following:

- 1) Mr. Steve Hoffert, Class IV, has been named as Superintendent of the Oberlin WWTP as of June 30, 2007.
- 2) There are 5 full time employees at the WWTP. Coverage at the WWTP is for 11 of 24 hours, 7 days per week, 365 days per year. A SCADA monitoring system has been installed with pager and call out, so that the WWTP is monitored 24 hours per day.
- 3) Lab analysis for all NPDES permitted parameters are conducted in the Oberlin WWTP lab, with the exception of heavy metals, total kjeldahl nitrogen, cyanide, and oil & grease, which are sent out to Water / Wastewater Labs, Inc.
- 4) Sludge generated at the Oberlin WWTP is treated and stored in two lagoons at the WWTP. The Class B sludge (6% to 7% solids) is hauled by Agri-Sludge and spread on farm sites in Lorain County. At the time of the inspection, 5 of 7 sludge drying beds were being used for dewatering of sludge. The remaining 2 sludge drying beds are being used for sludge holding.
- 5) Since the last inspection, a 1.7 meter sludge dewatering belt press was purchased for dewatering of sludge.
- 6) Screenings and grit removed at the WWTP are disposed of at the BFI landfill.

Mr. Jeff Baumann  
City of Oberlin WWTP  
January 30, 2008  
Page 6

- 7) Plans are being considered for the replacement of two (7.5 hp each) influent pumps with submersible pumps (20 hp each).
- 8) Sand filter media in the rapid sand filters is planned for replacement this year.
- 9) Since the last inspection, a Return Activated Sludge pump was replaced.

The City of Oberlin should continue implementation of operation and maintenance practices that will enable the WWTP to consistently meet its NPDES Permit limits.

Should you have any questions or comments on the contents of this letter, please contact me at (330) 963-1110.

Respectfully,



Charles E. Allen  
Environmental Engineer  
Division of Surface Water

CEA/mt