



State of Ohio Environmental Protection Agency

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Ted Strickland, Governor
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November 24, 2008

RE: MEDINA COUNTY
CITY OF WADSWORTH
WADSWORTH WWTP
COMPLIANCE SAMPLING INSPECTION (CSI)
(OH0027936 / 3PD00022)

Mayor and Council
City of Wadsworth
City Hall
120 Maple Street
Wadsworth, OH 44281

Dear Mayor and Council:

On October 27, 2008, a Compliance Sampling Inspection (CSI) was conducted at the City of Wadsworth Wastewater Treatment Plant (WWTP). Present during the inspection were Messrs. Don Berlin and Mike Lucas, representing the City of Wadsworth; and Messrs. Dave Stroud, Scott Winkler, Chris Moody, and this writer, of Ohio EPA.

The purpose of the inspection was twofold: 1) to evaluate the facility's compliance with NPDES Permit effluent limits, as well as the terms and conditions of its NPDES Permit; and 2) to collect a 24 hour composite sample of the WWTP effluent. The composite sample was started on October 27th, and picked up on October 28th, and was split with the WWTP laboratory for their analysis.

Evaluated during the inspection were the treatment plant processes, effluent discharge quality, and general compliance with the intent of the permit. Results of the Ohio EPA composite sample analysis will be compared with analytical results comparison. This Compliance Sampling Inspection was the second of two scheduled for the Wadsworth WWTP. The first Compliance Sampling Inspection was conducted at the WWTP on September 8-9, 2008.

At the time of the inspection, all treatment components were in operation, and observation of the effluent being discharged revealed no visual signs of floating debris, oil and grease, or high levels of solids.

A review of the electronic Discharge Monitoring Reports (eDMR's) reported for the Wadsworth WWTP for the period of January 1, 2007, through October 1, 2008, found the following NPDES Permit effluent violations:

**WADSWORTH WWTP
EFFLUENT NUMERICAL VIOLATIONS
NPDES PERMIT NO. 3PE00022
(1/1/07 THROUGH 10/1/08)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2007	Copper, Total Recoverable	30D Conc	25	30.	1/1/2007
January 2007	Copper, Total Recoverable	30D Qty	0.34	.43603	1/1/2007
February 2007	Copper, Total Recoverable	30D Conc	25	30.	2/1/2007

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	Total Suspended Solids	30D Qty	272	289.565	3/1/2007
March 2007	CBOD 5 day	7D Qty	313	333.392	3/1/2007
March 2007	Copper, Total Recoverable	30D Conc	25	42.	3/1/2007
March 2007	Copper, Total Recoverable	30D Qty	0.34	.75034	3/1/2007
March 2007	Copper, Total Recoverable	1D Conc	39	42.	3/22/2007
March 2007	Copper, Total Recoverable	1D Qty	0.54	.75034	3/22/2007
April 2007	Copper, Total Recoverable	30D Conc	25	30.	4/1/2007
April 2007	Copper, Total Recoverable	30D Qty	0.34	.50984	4/1/2007
May 2007	Copper, Total Recoverable	30D Conc	25	48.	5/1/2007
May 2007	Copper, Total Recoverable	30D Qty	0.34	.4433	5/1/2007
May 2007	Copper, Total Recoverable	1D Conc	39	48.	5/24/2007
June 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	1.61667	6/1/2007
June 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.4	6/15/2007
June 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	3.13333	6/22/2007
July 2007	Copper, Total Recoverable	1D Conc	39	46.	7/27/2007
July 2007	Copper, Total Recoverable	1D Qty	0.54	.95935	7/27/2007
August 2007	Copper, Total Recoverable	30D Conc	25	54.	8/1/2007
August 2007	Copper, Total Recoverable	30D Qty	0.34	.54572	8/1/2007
August 2007	Copper, Total Recoverable	1D Conc	39	54.	8/16/2007
August 2007	Copper, Total Recoverable	1D Qty	0.54	.54572	8/16/2007
March 2008	Bis (2-ethylhexyl) Phthalate	30D Conc	9.6	12.8	3/1/2008
March 2008	Bis (2-ethylhexyl) Phthalate	30D Qty	0.13	.56878	3/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	6.06467	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	9.8825	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	30D Qty	20.4	74.8981	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	122.631	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	6.71667	5/8/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	86.5058	5/8/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.98333	5/15/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	38.3593	5/15/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	5.17333	5/22/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	59.7485	5/22/2008
June 2008	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	3.92231	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.61	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	30D Qty	20.4	44.1201	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	31.3832	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	11.0433	6/8/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	123.017	6/8/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.35	6/15/2008
July 2008	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	1.00714	7/1/2008
August 2008	Oil and Grease, Hexane	1D Conc	7.2	10.	8/7/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.2	8/11/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.2	8/12/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.	8/13/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.2	8/14/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.	8/15/2008

A review of the eDMR's for the same period also found numerous effluent reporting code violations. These effluent reporting code violations are included with this report in Attachment A.

Various items were discussed with Messrs. Berlin and Lucas during the inspection. The following is a summary of items discussed, and observations made, during the inspection:

- 1) The Wadsworth WWTP completed construction of its upgrade in September 2008. Upgrade construction was initiated approximately March 2005.
- 2) The WWTP hydraulic capacity was increased from an average daily design flow (ADDF) of 3.6 MGD, to 5.0 MGD. NPDES permitted loadings remained the same, however.
- 3) Mr. Don Berlin, Class III licensed operator, became superintendent of the WWTP in December 2006. Mr. Mike Lucas is the WWTP chief operator. The Wadsworth WWTP is currently under the technical supervision of Mr. Dan Moss, Class IV wastewater operator, of B&N engineers. Mr. Chuck Ash is the Pretreatment Program coordinator. Mr. Ash has also submitted his paperwork and application for the Class IV wastewater operator's license.
- 4) There are approximately 11 full time employees at the Wadsworth WWTP, with the plant being manned 24/7, except for every other two weeks on Friday and Saturday night.
- 5) Since the last inspection and WWTP upgrade, the new SCADA system was installed and brought online. The SCADA system monitors the WWTP operation and, in the absence of operators, notifies the appropriate personnel of any operational problems.
- 6) Influent to the WWTP is automatically screened. Screenings are picked up every other day and taken to the landfill.
- 7) Both circular primary settling tanks were in operation. Contents of the primaries were the typical turbid gray color. Sludge collection/scraping mechanisms were operating, and the effluent troughs were clean and free of solids.
- 8) Effluent from the primaries is discharged to the 12 aeration tanks, all of which were in use. Contents of the aerations tanks were well aerated, medium brown in color, with a thin layer of crisp light brown foam, caused by fine bubble diffusion.
- 9) Following aeration, wastewater enters the 2 final settling tanks, both of which were in operation. Contents of the final settling tanks were non turbid, with a slight rising pinfloc. Effluent from the final tanks was clear and contained no solids.
- 10) All 3 rapid sand filters were operating. Filters are backwashed on a timed basis, approximately twice daily.

- 11) Treated effluent is disinfected utilizing Ultra Violet disinfection prior to discharge. UV bulbs (60) are automatically cleaned. Following disinfection, the effluent is post aerated utilizing a step-down cascade prior to entering the receiving stream.
- 12) Primary sludge generated at the WWTP is either sent to the primary anaerobic digester, or blended with waste activated sludge. There are 2 primary anaerobic digesters, of which only the #1 digester is heated. There are 2 secondary anaerobic digesters, of which #2 was empty at the time of inspection.
- 13) Sludge from the aeration tanks is sent to the 2 Waste Activated Sludge storage tanks.
- 14) Polymer is added to sludge before it is dewatered. Sludge is thickened by a gravity belt and filter press. Solids are 3.5% before dewatering, and approximately 22-24% post pressing.
- 15) Sludge is pressed every day, during 8 hour (first) shifts. Pressed sludge is picked up approximately every other day.
- 16) Dewatered sludge generated meets Class B land application standards, and is land applied by Agri Sludge. Liquid sludge has not been hauled since 2007.
- 17) Results of the September 8-9, 2008 sampling inspection came back indicating some toxicity in the effluent from the WWTP. The results indicate that Wadsworth WWTP outfall 001 effluents were acutely toxic to *C. dubia*.
- 18) It was recommended that additional bioassays be conducted to determine the magnitude of toxicity associated with the WWTP discharge. It was also recommended that the discharge data from the Wadsworth WWTP outfall 001, and the River Styx, be evaluated to determine if chronic toxicity is of concern. Chronic tests may be required.
- 19) Analysis of ammonia-nitrogen, CBOD₅, total suspended solids, fecal coliform, dissolved oxygen, pH, and temperature, is conducted at the Wadsworth WWTP laboratory. Heavy metals, oil & grease, nitrate-nitrite, and all sludge samples are sent out to a commercial lab (Janesko Labs) for analysis.
- 20) Results of the (Discharge Monitoring Report Quality Assurance) DMR-QA Study No. 28 for the Wadsworth WWTP unknown found several parameters which were marginally within the 'acceptable' range for the performance evaluation, but still needed to be checked for error. Those parameters were: Chloride; Total Dissolved Solids; Total Phenolics; Manganese; and Zinc.
- 21) Two other parameters were deemed 'unacceptable', and in need of retesting after determining the cause for error. Those parameters were Total Suspended Solids and Barium.

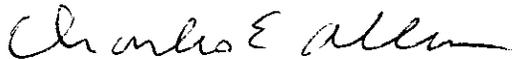
- 22) A quick review of lab procedures and equipment was conducted by Messrs. Stroud and Winkler. Mr. Stroud stressed the importance of keeping all meters, balances, and test equipment properly calibrated. Also stressed was the importance of keeping records of all calibration and work completed on the analytical equipment.
- 23) During the WWTP walk-through it was noted that used plastic drums, in which the polymer used for sludge dewatering is shipped and stored, were being kept outside on top of the blended sludge tanks. The drums were in an area open to the elements, and not under cover.

This storage procedure is in violation of storm water management plan practices, as it allows for improper exposure of the material to precipitation, which could subsequently be discharged down storm drains on the property. The drums need to either be stored indoors, or have some type of covering over them, to prevent possible contaminated runoff.

- 24) An operation and maintenance manual is under development by consultants, for the newly upgraded WWTP.

Should you have any questions or comments regarding the inspection report or this letter, please contact me at this office, or call (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

ATTACHMENT A

WADSWORTH WWTP REPORTING CODE VIOLATIONS NPDES PERMIT NO. 3PE00022 (1/1/07 THROUGH 10/1/08)

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
February 2007	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	02/22/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/01/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/02/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/03/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/04/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/05/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/06/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/07/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/08/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/09/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/10/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/11/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/12/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/13/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/14/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/15/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/16/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/17/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/18/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/19/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/20/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/21/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/22/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/23/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/24/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/25/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/26/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/27/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/28/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/29/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/30/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/31/2007
June 2007	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	06/01/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/01/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/02/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/03/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/04/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/05/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/06/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/07/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/08/2007
June 2007	001	Phosphorus, Total (P)	1/Week	1	0	06/08/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/09/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/10/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/11/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/12/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/13/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/14/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/15/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/16/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/17/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/18/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/19/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/20/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/21/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/22/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/23/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/24/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/25/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/26/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/27/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/28/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/29/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/30/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/01/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/02/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/03/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/04/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/05/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/06/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/07/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/08/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/09/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/10/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/11/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/12/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/13/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/14/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/15/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/16/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/17/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/18/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/19/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/20/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/21/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/22/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/23/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/24/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/25/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/26/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/27/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/28/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/29/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/30/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/31/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/01/2007
August 2007	901	Fecal Coliform	1/Month	1	0	08/01/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/02/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/03/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/04/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/05/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/06/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/07/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/08/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/09/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/10/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/11/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/12/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/13/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/14/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/15/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/16/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/17/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/18/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/19/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/20/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/21/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/22/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/23/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/24/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/25/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/26/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/27/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/28/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/29/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/30/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/31/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/01/2007
September 2007	581	Sludge Weight	1/Quarter	1	0	09/01/2007
September 2007	581	Sludge Fee Weight	1/Quarter	1	0	09/01/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/02/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/03/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/04/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/05/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/06/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/07/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/08/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/09/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/10/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/11/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/12/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/13/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/14/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/15/2007
September 2007	001	Oil and Grease, Hexane	1/2Weeks	1	0	09/15/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/16/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/17/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/18/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/19/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/20/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/21/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/22/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/23/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/24/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/25/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/26/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/27/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/28/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/29/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/30/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/01/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/02/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/03/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/04/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/05/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/06/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/07/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/08/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/09/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/10/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/11/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/12/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/13/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/14/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/15/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/16/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/17/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/18/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/19/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/20/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/21/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/22/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/23/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/24/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/25/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/26/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/27/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/28/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/29/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/30/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/31/2007
November 2007	001	CBOD 5 day	3/Week	3	2	11/01/2007
November 2007	001	Phosphorus, Total (P)	1/Week	1	0	11/01/2007
November 2007	001	Oil and Grease, Hexane	1/2Weeks	1	0	11/01/2007
November 2007	001	Phosphorus, Total (P)	1/Week	1	0	11/22/2007
January 2008	001	Flow Rate	1/Day	1	0	01/19/2008
February 2008	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	02/08/2008
February 2008	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	02/22/2008
February 2008	001	Phosphorus, Total (P)	1/Week	1	0	02/22/2008
March 2008	581	Sludge Weight	1/Quarter	1	0	03/01/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/01/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/02/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/03/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/04/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/05/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/06/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/07/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/08/2008
May 2008	001	Phosphorus, Total (P)	1/Week	1	0	05/08/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/09/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/10/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/11/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/12/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/13/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/14/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/15/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/16/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/17/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/18/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/19/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/20/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/21/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/22/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/23/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/24/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/25/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/26/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/27/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/28/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/29/2008



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

November 24, 2008

RE: MEDINA COUNTY
CITY OF WADSWORTH
WADSWORTH WWTP
COMPLIANCE SAMPLING INSPECTION (CSI)
(OH0027936 / 3PD00022)

Mayor and Council
City of Wadsworth
City Hall
120 Maple Street
Wadsworth, OH 44281

Dear Mayor and Council:

On October 27, 2008, a Compliance Sampling Inspection (CSI) was conducted at the City of Wadsworth Wastewater Treatment Plant (WWTP). Present during the inspection were Messrs. Don Berlin and Mike Lucas, representing the City of Wadsworth; and Messrs. Dave Stroud, Scott Winkler, Chris Moody, and this writer, of Ohio EPA.

The purpose of the inspection was twofold: 1) to evaluate the facility's compliance with NPDES Permit effluent limits, as well as the terms and conditions of its NPDES Permit; and 2) to collect a 24 hour composite sample of the WWTP effluent. The composite sample was started on October 27th, and picked up on October 28th, and was split with the WWTP laboratory for their analysis.

Evaluated during the inspection were the treatment plant processes, effluent discharge quality, and general compliance with the intent of the permit. Results of the Ohio EPA composite sample analysis will be compared with analytical results comparison. This Compliance Sampling Inspection was the second of two scheduled for the Wadsworth WWTP. The first Compliance Sampling Inspection was conducted at the WWTP on September 8-9, 2008.

At the time of the inspection, all treatment components were in operation, and observation of the effluent being discharged revealed no visual signs of floating debris, oil and grease, or high levels of solids.

A review of the electronic Discharge Monitoring Reports (eDMR's) reported for the Wadsworth WWTP for the period of January 1, 2007, through October 1, 2008, found the following NPDES Permit effluent violations:

**WADSWORTH WWTP
EFFLUENT NUMERICAL VIOLATIONS
NPDES PERMIT NO. 3PE00022
(1/1/07 THROUGH 10/1/08)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2007	Copper, Total Recoverable	30D Conc	25	30.	1/1/2007
January 2007	Copper, Total Recoverable	30D Qty	0.34	.43603	1/1/2007
February 2007	Copper, Total Recoverable	30D Conc	25	30.	2/1/2007

Mayor and Council
City of Wadsworth
November 24, 2008
Page 2

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	Total Suspended Solids	30D Qty	272	289.565	3/1/2007
March 2007	CBOD 5 day	7D Qty	313	333.392	3/1/2007
March 2007	Copper, Total Recoverable	30D Conc	25	42.	3/1/2007
March 2007	Copper, Total Recoverable	30D Qty	0.34	.75034	3/1/2007
March 2007	Copper, Total Recoverable	1D Conc	39	42.	3/22/2007
March 2007	Copper, Total Recoverable	1D Qty	0.54	.75034	3/22/2007
April 2007	Copper, Total Recoverable	30D Conc	25	30.	4/1/2007
April 2007	Copper, Total Recoverable	30D Qty	0.34	.50984	4/1/2007
May 2007	Copper, Total Recoverable	30D Conc	25	48.	5/1/2007
May 2007	Copper, Total Recoverable	30D Qty	0.34	.4433	5/1/2007
May 2007	Copper, Total Recoverable	1D Conc	39	48.	5/24/2007
June 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	1.61667	6/1/2007
June 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.4	6/15/2007
June 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	3.13333	6/22/2007
July 2007	Copper, Total Recoverable	1D Conc	39	46.	7/27/2007
July 2007	Copper, Total Recoverable	1D Qty	0.54	.95935	7/27/2007
August 2007	Copper, Total Recoverable	30D Conc	25	54.	8/1/2007
August 2007	Copper, Total Recoverable	30D Qty	0.34	.54572	8/1/2007
August 2007	Copper, Total Recoverable	1D Conc	39	54.	8/16/2007
August 2007	Copper, Total Recoverable	1D Qty	0.54	.54572	8/16/2007
March 2008	Bis (2-ethylhexyl) Phthalate	30D Conc	9.6	12.8	3/1/2008
March 2008	Bis (2-ethylhexyl) Phthalate	30D Qty	0.13	.56878	3/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	6.06467	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	9.8825	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	30D Qty	20.4	74.8981	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	122.631	5/1/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	6.71667	5/8/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	86.5058	5/8/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.98333	5/15/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	38.3593	5/15/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	5.17333	5/22/2008
May 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	59.7485	5/22/2008
June 2008	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	3.92231	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.61	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	30D Qty	20.4	44.1201	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	31.3832	6/1/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	11.0433	6/8/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Qty	31.3	123.017	6/8/2008
June 2008	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	2.35	6/15/2008
July 2008	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	1.00714	7/1/2008
August 2008	Oil and Grease, Hexane	1D Conc	7.2	10.	8/7/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.2	8/11/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.2	8/12/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.	8/13/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.2	8/14/2008
August 2008	Dissolved Oxygen	1D Conc	5.3	5.	8/15/2008

A review of the eDMR's for the same period also found numerous effluent reporting code violations. These effluent reporting code violations are included with this report in Attachment A.

Various items were discussed with Messrs. Berlin and Lucas during the inspection. The following is a summary of items discussed, and observations made, during the inspection:

- 1) The Wadsworth WWTP completed construction of its upgrade in September 2008. Upgrade construction was initiated approximately March 2005.
- 2) The WWTP hydraulic capacity was increased from an average daily design flow (ADDF) of 3.6 MGD, to 5.0 MGD. NPDES permitted loadings remained the same, however.
- 3) Mr. Don Berlin, Class III licensed operator, became superintendent of the WWTP in December 2006. Mr. Mike Lucas is the WWTP chief operator. The Wadsworth WWTP is currently under the technical supervision of Mr. Dan Moss, Class IV wastewater operator, of B&N engineers. Mr. Chuck Ash is the Pretreatment Program coordinator. Mr. Ash has also submitted his paperwork and application for the Class IV wastewater operator's license.
- 4) There are approximately 11 full time employees at the Wadsworth WWTP, with the plant being manned 24/7, except for every other two weeks on Friday and Saturday night.
- 5) Since the last inspection and WWTP upgrade, the new SCADA system was installed and brought online. The SCADA system monitors the WWTP operation and, in the absence of operators, notifies the appropriate personnel of any operational problems.
- 6) Influent to the WWTP is automatically screened. Screenings are picked up every other day and taken to the landfill.
- 7) Both circular primary settling tanks were in operation. Contents of the primaries were the typical turbid gray color. Sludge collection/scraping mechanisms were operating, and the effluent troughs were clean and free of solids.
- 8) Effluent from the primaries is discharged to the 12 aeration tanks, all of which were in use. Contents of the aerations tanks were well aerated, medium brown in color, with a thin layer of crisp light brown foam, caused by fine bubble diffusion.
- 9) Following aeration, wastewater enters the 2 final settling tanks, both of which were in operation. Contents of the final settling tanks were non turbid, with a slight rising pinfloc. Effluent from the final tanks was clear and contained no solids.
- 10) All 3 rapid sand filters were operating. Filters are backwashed on a timed basis, approximately twice daily.

- 11) Treated effluent is disinfected utilizing Ultra Violet disinfection prior to discharge. UV bulbs (60) are automatically cleaned. Following disinfection, the effluent is post aerated utilizing a step-down cascade prior to entering the receiving stream.
- 12) Primary sludge generated at the WWTP is either sent to the primary anaerobic digester, or blended with waste activated sludge. There are 2 primary anaerobic digesters, of which only the #1 digester is heated. There are 2 secondary anaerobic digesters, of which #2 was empty at the time of inspection.
- 13) Sludge from the aeration tanks is sent to the 2 Waste Activated Sludge storage tanks.
- 14) Polymer is added to sludge before it is dewatered. Sludge is thickened by a gravity belt and filter press. Solids are 3.5% before dewatering, and approximately 22-24% post pressing.
- 15) Sludge is pressed every day, during 8 hour (first) shifts. Pressed sludge is picked up approximately every other day.
- 16) Dewatered sludge generated meets Class B land application standards, and is land applied by Agri Sludge. Liquid sludge has not been hauled since 2007.
- 17) Results of the September 8-9, 2008 sampling inspection came back indicating some toxicity in the effluent from the WWTP. The results indicate that Wadsworth WWTP outfall 001 effluents were acutely toxic to *C. dubia*.
- 18) It was recommended that additional bioassays be conducted to determine the magnitude of toxicity associated with the WWTP discharge. It was also recommended that the discharge data from the Wadsworth WWTP outfall 001, and the River Styx, be evaluated to determine if chronic toxicity is of concern. Chronic tests may be required.
- 19) Analysis of ammonia-nitrogen, CBOD₅, total suspended solids, fecal coliform, dissolved oxygen, pH, and temperature, is conducted at the Wadsworth WWTP laboratory. Heavy metals, oil & grease, nitrate-nitrite, and all sludge samples are sent out to a commercial lab (Janesko Labs) for analysis.
- 20) Results of the (Discharge Monitoring Report Quality Assurance) DMR-QA Study No. 28 for the Wadsworth WWTP unknown found several parameters which were marginally within the 'acceptable' range for the performance evaluation, but still needed to be checked for error. Those parameters were: Chloride; Total Dissolved Solids; Total Phenolics; Manganese; and Zinc.
- 21) Two other parameters were deemed 'unacceptable', and in need of retesting after determining the cause for error. Those parameters were Total Suspended Solids and Barium.

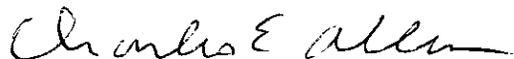
- 22) A quick review of lab procedures and equipment was conducted by Messrs. Stroud and Winkler. Mr. Stroud stressed the importance of keeping all meters, balances, and test equipment properly calibrated. Also stressed was the importance of keeping records of all calibration and work completed on the analytical equipment.
- 23) During the WWTP walk-through it was noted that used plastic drums, in which the polymer used for sludge dewatering is shipped and stored, were being kept outside on top of the blended sludge tanks. The drums were in an area open to the elements, and not under cover.

This storage procedure is in violation of storm water management plan practices, as it allows for improper exposure of the material to precipitation, which could subsequently be discharged down storm drains on the property. The drums need to either be stored indoors, or have some type of covering over them, to prevent possible contaminated runoff.

- 24) An operation and maintenance manual is under development by consultants, for the newly upgraded WWTP.

Should you have any questions or comments regarding the inspection report or this letter, please contact me at this office, or call (330) 963-1110.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

ATTACHMENT A

WADSWORTH WWTP REPORTING CODE VIOLATIONS NPDES PERMIT NO. 3PE00022 (1/1/07 THROUGH 10/1/08)

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
February 2007	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	02/22/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/01/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/02/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/03/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/04/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/05/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/06/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/07/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/08/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/09/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/10/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/11/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/12/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/13/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/14/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/15/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/16/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/17/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/18/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/19/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/20/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/21/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/22/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/23/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/24/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/25/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/26/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/27/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/28/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/29/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/30/2007
May 2007	001	Chlorine, Total Residual	1/Day	1	0	05/31/2007
June 2007	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	06/01/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/01/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/02/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/03/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/04/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/05/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/06/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/07/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/08/2007
June 2007	001	Phosphorus, Total (P)	1/Week	1	0	06/08/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/09/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/10/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/11/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/12/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/13/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/14/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/15/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/16/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/17/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/18/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/19/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/20/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/21/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/22/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/23/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/24/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/25/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/26/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/27/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/28/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/29/2007
June 2007	001	Chlorine, Total Residual	1/Day	1	0	06/30/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/01/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/02/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/03/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/04/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/05/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/06/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/07/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/08/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/09/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/10/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/11/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/12/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/13/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/14/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/15/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/16/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/17/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/18/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/19/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/20/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/21/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/22/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/23/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/24/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/25/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/26/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/27/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/28/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/29/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/30/2007
July 2007	001	Chlorine, Total Residual	1/Day	1	0	07/31/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/01/2007
August 2007	901	Fecal Coliform	1/Month	1	0	08/01/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/02/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/03/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/04/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/05/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/06/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/07/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/08/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/09/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/10/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/11/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/12/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/13/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/14/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/15/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/16/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/17/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/18/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/19/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/20/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/21/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/22/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/23/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/24/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/25/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/26/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/27/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/28/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/29/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/30/2007
August 2007	001	Chlorine, Total Residual	1/Day	1	0	08/31/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/01/2007
September 2007	581	Sludge Weight	1/Quarter	1	0	09/01/2007
September 2007	581	Sludge Fee Weight	1/Quarter	1	0	09/01/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/02/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/03/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/04/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/05/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/06/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/07/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/08/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/09/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/10/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/11/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/12/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/13/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/14/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/15/2007
September 2007	001	Oil and Grease, Hexane	1/2Weeks	1	0	09/15/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/16/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/17/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/18/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/19/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/20/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/21/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/22/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/23/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/24/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/25/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/26/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/27/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/28/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/29/2007
September 2007	001	Chlorine, Total Residual	1/Day	1	0	09/30/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/01/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/02/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/03/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/04/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/05/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/06/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/07/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/08/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/09/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/10/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/11/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/12/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/13/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/14/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/15/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/16/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/17/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/18/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/19/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/20/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/21/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/22/2007

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/23/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/24/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/25/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/26/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/27/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/28/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/29/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/30/2007
October 2007	001	Chlorine, Total Residual	1/Day	1	0	10/31/2007
November 2007	001	CBOD 5 day	3/Week	3	2	11/01/2007
November 2007	001	Phosphorus, Total (P)	1/Week	1	0	11/01/2007
November 2007	001	Oil and Grease, Hexane	1/2Weeks	1	0	11/01/2007
November 2007	001	Phosphorus, Total (P)	1/Week	1	0	11/22/2007
January 2008	001	Flow Rate	1/Day	1	0	01/19/2008
February 2008	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	02/08/2008
February 2008	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	02/22/2008
February 2008	001	Phosphorus, Total (P)	1/Week	1	0	02/22/2008
March 2008	581	Sludge Weight	1/Quarter	1	0	03/01/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/01/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/02/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/03/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/04/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/05/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/06/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/07/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/08/2008
May 2008	001	Phosphorus, Total (P)	1/Week	1	0	05/08/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/09/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/10/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/11/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/12/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/13/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/14/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/15/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/16/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/17/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/18/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/19/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/20/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/21/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/22/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/23/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/24/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/25/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/26/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/27/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/28/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/29/2008

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/30/2008
May 2008	001	Chlorine, Total Residual	1/Day	1	0	05/31/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/01/2008
June 2008	581	Sludge Fee Weight	1/Quarter	1	0	06/01/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/02/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/03/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/04/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/05/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/06/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/07/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/08/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/09/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/10/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/11/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/12/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/13/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/14/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/15/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/16/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/17/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/18/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/19/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/20/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/21/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/22/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/23/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/24/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/25/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/26/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/27/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/28/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/29/2008
June 2008	001	Chlorine, Total Residual	1/Day	1	0	06/30/2008
July 2008	001	Fecal Coliform	3/Week	3	2	07/01/2008
July 2008	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	07/08/2008
July 2008	001	Fecal Coliform	3/Week	3	2	07/15/2008
August 2008	001	Fecal Coliform	3/Week	3	2	08/01/2008
August 2008	001	Nitrogen, Ammonia (NH3-N)	3/Week	3	2	08/15/2008