

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 11, 2011

RE: MEDINA COUNTY
VILLAGE OF SPENCER
SPENCER WWTP CEI
(NPDES No. 3PA00018)

Mayor and Council
Village of Spencer
PO Box 336
109 North Main Street
Spencer, OH 44275

Dear Mayor and Council:

On April 19, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Village of Spencer Wastewater Treatment Plant (WWTP). Present during the inspection were Mr. Jim Ramsey, representing the Village as superintendent of the WWTP, and Mr. Rich Blasick and this writer, of the Ohio EPA. The purpose of the inspection was to evaluate the facility's compliance with NPDES Permit effluent limits, as well as discuss the upcoming NPDES Permit renewal for the facility. The last (CEI) inspection of the Spencer WWTP was May 29, 2008.

The April 19th Inspection of the WWTP resulted in the following observations:

- 1) Influent is pumped into the WWTP via two influent pumps. During low flows, the pumps are operated one at a time. At flow rates of approximately 200 gpm (0.288 MGD), the second pump becomes operational.
- 2) Preliminary treatment for the WWTP consists of a manually raked bar screen. Screenings are deposited in a dumpster, and are disposed of at a solid waste landfill.
- 3) The comminutor was out of service, and has been for several years.
- 4) The aeration basin (Parkson Biolac System) contents were medium brown in color, and were being well aerated.
- 5) The final clarifier was in use, and exhibited floating scum and algae. A manual skimmer is used every couple of days to remove scum from the clarifier content surface.

Effluent from the clarifier appeared clear and free of solids.

- 6) Sludge from the clarifier is manually returned to either the aeration basin, or the solids basin.
- 7) The polishing basin is no longer used, as quality of the water discharged from the basin is usually worse than the water entering it.
- 8) Treated wastewater is disinfected utilizing an Ultra Violet disinfection system. However, the UV system was not in operation at the time of the inspection, as it is not required from November 1st through April 30th.
- 9) The effluent was being post aerated prior to discharge to the receiving stream, and it appeared clear, and free of solids or foam.

A review of the electronic Discharge Monitoring Reports (eDMRs) for the Village of Spencer WWTP found the following numeric effluent violations reported since the last inspection:

**VILLAGE OF SPENCER
 NPDES PERMIT NO. 3PA00018
 EFFLUENT NUMERIC VIOLATIONS
 (MAY 1, '08 – APR. 1. '11)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2010	pH	1D Conc	6.5	.	5/1/2010
May 2010	pH	1D Conc	6.5	.	5/2/2010
May 2010	pH	1D Conc	6.5	.	5/3/2010
May 2010	pH	1D Conc	6.5	.	5/4/2010
May 2010	pH	1D Conc	6.5	.	5/5/2010
May 2010	pH	1D Conc	6.5	.	5/6/2010
May 2010	pH	1D Conc	6.5	.	5/7/2010
May 2010	pH	1D Conc	6.5	.	5/8/2010
May 2010	pH	1D Conc	6.5	.	5/9/2010
May 2010	pH	1D Conc	6.5	.	5/10/2010
May 2010	pH	1D Conc	6.5	.	5/11/2010
May 2010	pH	1D Conc	6.5	.	5/12/2010
May 2010	pH	1D Conc	6.5	.	5/13/2010
May 2010	pH	1D Conc	6.5	.	5/14/2010
May 2010	pH	1D Conc	6.5	.	5/15/2010
May 2010	pH	1D Conc	6.5	.	5/16/2010
May 2010	pH	1D Conc	6.5	.	5/17/2010
May 2010	pH	1D Conc	6.5	.	5/18/2010
May 2010	pH	1D Conc	6.5	.	5/19/2010

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2010	pH	1D Conc	6.5	.	5/20/2010
May 2010	pH	1D Conc	6.5	.	5/21/2010
May 2010	pH	1D Conc	6.5	.	5/22/2010
May 2010	pH	1D Conc	6.5	.	5/23/2010
May 2010	pH	1D Conc	6.5	.	5/24/2010
May 2010	pH	1D Conc	6.5	.	5/25/2010
May 2010	pH	1D Conc	6.5	.	5/26/2010
May 2010	pH	1D Conc	6.5	.	5/27/2010
May 2010	pH	1D Conc	6.5	.	5/28/2010
May 2010	pH	1D Conc	6.5	.	5/29/2010
May 2010	pH	1D Conc	6.5	.	5/30/2010
May 2010	pH	1D Conc	6.5	.	5/31/2010
August 2010	Nitrogen, Ammonia (NH3-N)	30D Conc	1.5	1.558	8/1/2010
August 2010	Nitrogen, Ammonia (NH3-N)	7D Conc	2.3	7.	8/1/2010

Various items discussed with Mr. Ramsey during the April 19th inspection were the following:

- 1) Since the last inspection, the backwater flow condition at the WWTP parshall flume/flow meter was corrected. The backwater flow condition was resulting in erroneous flow readings upwards of +35%. The project was completed around August 1, 2008.
- 2) Since the last inspection, Mr. Jim Ramsey has become superintendent of the WWTP. Mr. Ramsey holds a Class II wastewater operator's license. Mr. Ramsey is the only full time person at the WWTP, although there is a part time person who works at the plant half days on the weekends, and parts of some weekdays. Weekday hours are 7 a.m. to 3 p.m., Monday through Friday.
- 3) The Spencer WWTP still has no auto dialers or SCADA warning system, in case of operational problems or equipment malfunction at the WWTP, when the plant is not staffed. Any emergencies experienced at the plant while unstaffed would be found upon return of the operator the next morning, or possibly by passing police patrol car.
- 4) Spencer WWTP sludge is currently being hauled to the Lodi WWTP for treatment and disposal. Approximately 60,000 gallons of sludge is hauled once per year by Agri-Sludge.

- 5) Fecal coliform and ammonia analyses are conducted by the Lodi WWTP lab, and sludge heavy metal analyses are done by a private lab (Masi Labs of Columbus, OH). All other required parameters (color, odor, turbidity, temperature, pH, dissolved oxygen, suspended solids, and CBOD₅) are tested at the Spencer WWTP lab.
- 6) It is recommended that a chain of custody form be utilized for all samples collected and analyzed. A sample copy of a chain of custody form is enclosed with this report.
- 7) The upcoming NPDES permit renewal was discussed with Mr. Ramsey. Specific items discussed are as follows:
 - a. The new permit will contain an interim and final effluent table. The interim table will require fecal coliform limits be met, and the effluent tested for E. coli. After 12 months, the fecal coliform limits and monitoring will be eliminated, and replaced with E. coli limits. Mr. Ramsey will need to evaluate the WWTP for its ability to meet the final E. coli limits, and report to the Ohio EPA before the 12 month period ends.
 - b. The new permit will require the posting of a sign at the WWTP outfall, with specific information pertaining to the source, and contact information. All information necessary on the sign, and the sign requirements, will be outlined in the new NPDES permit.
 - c. Although sludge is currently only hauled to another WWTP for disposal, Mr. Ramsey requested the reporting option for land application of sludge (Station 581) be kept in the renewed permit.
- 8) The Spencer WWTP received flow from one industrial user (Spencer Forge). Spencer Forge is currently under NPDES permit with the Ohio EPA.
- 9) The sanitary sewer collection contains one pump station, which has an alarm in case of failure/high water level.
- 10) There is a backup generator at the WWTP. The generator is capable of running the entire WWTP in case of electrical outage, and the generator is auto tested every Monday.

Mayor and Council
Village of Spencer
May 11, 2011
Page 5

- 11) There is an auto sampler collecting samples at the WWTP effluent outfall. However, the samples are collected on a time basis (1x/hour), not flow proportionally.

The Village of Spencer should continue with all efforts that will enable the WWTP to consistently meet its NPDES Permit limits. 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