



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Norleski, Director

April 29, 2010

RE: SEBRING WASTEWATER  
NPDES PERMIT NO. 3PC00011  
FFY 2010 CEI

Mr. Doug Burchard, Manager  
Village of Sebring  
135 E. Ohio Street  
Sebring, OH 44672

Mr. Burchard:

On April 7, 2010, this writer conducted an unannounced inspection of the Sebring POTW. The intent of the inspection was to assess operations and maintenance and to perform a compliance evaluation relative to the NPDES Permit. At the time of the inspection, the treatment plant was considered satisfactory.

### **Observations**

The plant appeared well maintained and well operated. One oxidation ditch was in service at the time of the inspection. The mixed liquor in the ditch was medium brown color and formed a good floc. The clarifier effluent was clear and the receiving stream showed no signs of solids deposition. Operations of the treatment plant were considered satisfactory at the time of the inspection. Other observations of the treatment plant are as follows.

1. The new equalization tank was on line. The overflow from the tank was directed to Outfall 001 for monitoring. The new tank is a significant improvement over the old equalization tank with regards to capacity and operations. As a result of the new equalization tank, the headworks bypass will be eliminated.
2. The clarifiers should be taken offline during low flow conditions for inspection. All routine maintenance items should be addressed and any repairs to equipment and concrete should be made. All steel surfaces should be inspected and appropriate corrosion resistant coatings applied. These are routine procedures for clarifiers to ensure that they operate during critical periods such as high flow conditions or during cold weather periods. It is my understanding that the clarifiers have not been taken out of service for inspection for several years. It is also thought that the clarifier system may be leaking as evidenced by the saturated area between the clarifiers and oxidation ditches.
3. The sludge digestion tanks were inadequate at the time of the inspection. No blower was available to aerate or mix the sludge as necessary. No mixing of the contents or decanting of liquid is possible. The tanks simply act as holding tanks.

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The contents of the sludge tanks were septic at the time of the inspection. Concrete walls of the tanks are significantly degraded. The village should be planning for the construction of new sludge digesters. It is also recommended that the village evaluate the economics of purchasing a sludge belt press rather than using the sludge drying beds which are labor intensive, or hauling the liquid sludge which is usually expensive.

### **Sewer System Overflows**

The NPDES Permit has a reporting station identified as the 300 station. This reporting station is applicable to any sanitary sewer overflow in the collection system, including basement flooding. Based on discussions with Mr. Hatten, it is understood that citizen calls to report sanitary sewer overflows and basement flooding are directed to the Service Department.

Be advised that in the event there are overflows throughout year, the village must properly record and report such events in accordance with the requirements of the NPDES Permit. Overflow and basement flooding events must be recorded by the Service Department and provided to the wastewater treatment plant for proper reporting. Part II, Item P of the NPDES Permit should be reviewed for reporting requirements. Procedures must be established by the village for immediate reporting of overflow events as required in Part II, Item P.1.a.

### **Compliance Review**

#### Monthly Reports

The Monthly Operating Reports (MORs) were reviewed to determine compliance with the NPDES Permit. The period of review was August 2008 through February 2010. One violation of the NPDES Permit was reported during the review period.

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
December 2008	Oil and Grease	1-Day Conc.	10 mg/l	20 mg/l	12/16/2008

#### Compliance Schedule – Part I.C of the NPDES Permit

Because a new NPDES Permit is being drafted, a review of the compliance schedules in Part 1.C of the existing permit was completed to identify any outstanding items. Following is a summary of the status of each section of the schedule.

#### **Municipal Construction Schedule (Construction Complete)**

The village is has been under a compliance schedule to address inflow and infiltration to the wastewater treatment works. It is the understanding of this writer that the equalization tank

is completed except for telemetering. It is also the understanding of this writer that all sewer rehabilitation has been completed. These two actions were identified by the village as the main work to be completed in order to control excess water to the collection system. It appears that the village has substantially completed all the steps identified in the compliance schedule. However, it is the understanding that there remains outstanding and necessary information that must be provided to the Division of Environmental and Financial Assessment (DEFA). All information must be provided in accordance with the timelines established by DEFA.

#### Municipal Pretreatment Schedule – Local Limits (Complete)

According to the schedule, the village was to adopt and incorporate revised local limits into a village ordinance not later than November 1, 2006. In addition, the village was to submit technical justification for a local limit on mercury no later than February 1, 2007. The local limit for mercury was included in the July 25, 2005 proposal from the village to modify the local limits. The revised limits received final approval from the Ohio EPA on May 9, 2009.

#### Mercury Variance (Outstanding)

Item C of schedule required that not later than February 1, 2007, the village was to submit one of the following with regards to compliance with the final mercury limit of 12 ng/l:

- 1) A letter stating it was capable of meeting the permit limit (12 ng/l) on mercury,
- 2) If the village believed it could take action leading to compliance with the water quality based effluent limit for mercury (12 ng/l), the village was to submit a request to modify the permit with an interim limit for mercury and a compliance schedule for actions to reduce effluent mercury concentrations, or
- 3) If it was determined that compliance was not possible without expensive end-of-pipe controls, the village was to submit an application for a variance from the mercury water quality standard.

A review of 30-day average mercury data dating back to July 2005 identified an average Potential Effluent Quality ( $PEQ_{avg}$ ) of 11.4 ng/l and a maximum Potential Effluent Quality ( $PEQ_{max}$ ) of 17.9 ng/l. A list of the mercury data is included in Attachment 1. From that data, it can be seen that the Sebring POTW has been unable to consistently comply with the 30-day average limit of 12 ng/l. The data shows that throughout the 5 year review period, the Sebring POTW exceeded the 12 ng/l limit on five occasions with the most recent exceedance occurring in January 2010. However, the 50<sup>th</sup> percentile of the mercury data over the past five years was only 4.55 ng/l, which indicates that the effluent mercury concentration is well below the 12 ng/l limit on most occasions. It may be that there are situations within the collection system or routine practices within the plant which have caused the periodic exceedances. It may also be that modifications of the plant, such as a new equalization tank and phosphorus removal, will address the isolated exceedances.

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The NPDES Permit renewal will contain a 30-day mercury limit of 12 ng/l. The village must closely review monthly mercury data to identify any exceedances of the limit and determine any possible causes. Periodic inspections by this office will include reviews of the mercury data to determine compliance with the mercury limit. In the event past and future modifications of the treatment system do not address the elevated mercury values, the permit may be modified to include actions required to identify and eliminate the causes.

In order to fulfill the requirements of Item C in Part 1.C of the permit, this writer requests a letter from the city stating that it intends to comply with the 12 ng/l limit. The letter should include possible causes for the past mercury exceedances and actions that will be taken to eliminate those causes. Also, the letter should include a commitment to review the recorded mercury concentration each month, and review and record such variables as weather conditions and activities within the plant that could result in exceedances of the 12 ng/l limit.

#### Inflow and Infiltration Analysis (Complete)

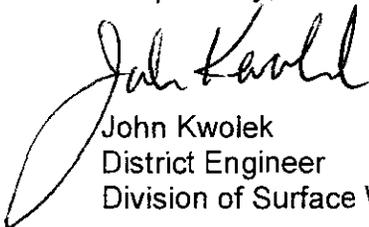
Not later than October 1, 2007, the village was to submit a final inflow and infiltration analysis report to the Northeast District Office. The inflow and infiltration analysis report was received at the Northeast District Office on May 3, 2007.

#### Sewer System Evaluation Study (Outstanding)

Not later than January 1, 2010, the village was to submit a final Sewer System Evaluation Study (SSES) report to the Northeast District Office. To date this office does not have record of receipt of the SSES report. Please forward the final report.

You may contact this office at (330) 963-1251 or at [john.kwolek@epa.state.oh.us](mailto:john.kwolek@epa.state.oh.us) to discuss any questions you may have regarding this inspection report.

Respectfully,



John Kwolek  
District Engineer  
Division of Surface Water

JK/mt

cc: Lee Hatten, Sebring POTW

File: Municipal/Sebring WWTP/Permit and Compliance

**Parameter name:** Mercury, Total (Low Level, PQL=1000)

**Reporting code:** 50286 (7/15/2005-2/3/2010)

**Units of measure:** ng/l

# of Obs.	# of Obs. > MDL	# of Obs. excluded	Min. Value	Max. Value
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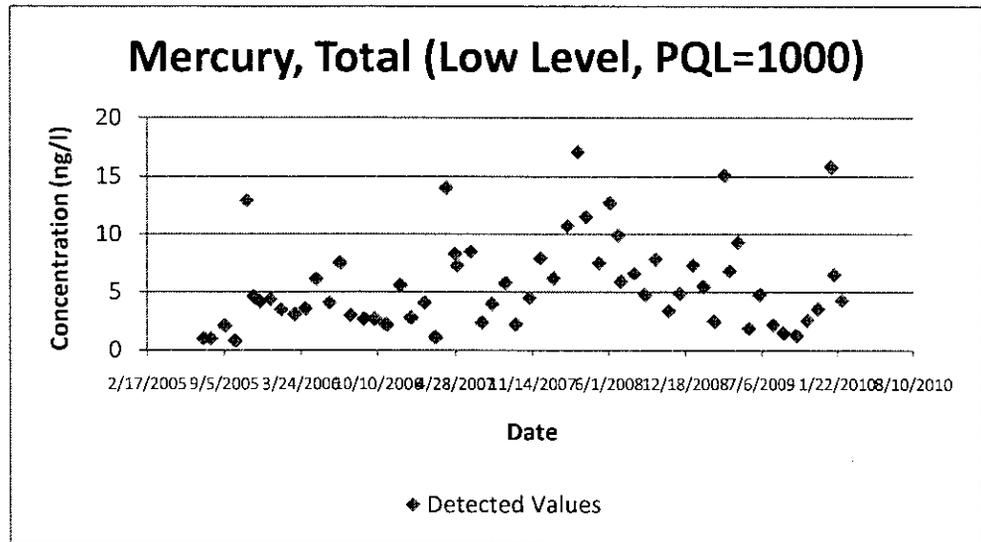
61      61      0      0.8      17.1

**Permit number:** 3pc00011

**Outfall number:** 001

Date	Reported Value	A Code	MDL	Enter "x" to exclude as outlier
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7/15/2005	1
8/3/2005	1
9/7/2005	2.1
10/4/2005	0.8
11/2/2005	12.9 *
11/21/2005	4.6
12/7/2005	4.2
1/4/2006	4.4
2/1/2006	3.5
3/8/2006	3.1
4/5/2006	3.6
5/3/2006	6.1
6/7/2006	4.1
7/5/2006	7.5
8/2/2006	3
9/6/2006	2.7
10/4/2006	2.7
11/1/2006	2.2
12/6/2006	5.6
1/3/2007	2.8
2/7/2007	4.1
3/7/2007	1.1
4/4/2007	14
4/27/2007	8.3
5/2/2007	7.3
6/6/2007	8.5
7/5/2007	2.4
8/1/2007	4
9/5/2007	5.8
10/3/2007	2.2
11/7/2007	4.5
12/5/2007	7.9
1/9/2008	6.2
2/13/2008	10.7
3/12/2008	17.1
4/2/2008	11.5
5/7/2008	7.5
6/4/2008	12.7
6/25/2008	9.9
7/2/2008	5.9
8/6/2008	6.6



9/3/2008	4.8
10/1/2008	7.8
11/5/2008	3.4
12/3/2008	4.9
1/7/2009	7.3
2/4/2009	5.5
3/4/2009	2.5
4/1/2009	15.1
4/15/2009	6.8
5/6/2009	9.3
6/3/2009	1.9
7/1/2009	4.8
8/5/2009	2.2
9/2/2009	1.5
10/7/2009	1.3
11/4/2009	2.6
12/2/2009	3.6
1/6/2010	15.8
1/13/2010	6.5
2/3/2010	4.3

MaxChk Value	PEQ Method	R <sup>2</sup> Value	PEQ average	PEQ max.
19	B	0.987	11.743	18.352

# Mercury, Total (Low Level, PQL=1000)

