



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Crawford County
City of Crestline WWTP
NPDES Permit
Notice of Violation

January 2, 2009

Mr. Tyson Quail
City of Crestline
100 North Seltzer Street
Crestline, Ohio 44827

Dear Mr. Quail:

On September 30, 2008, an inspection of the City of Crestline Wastewater Treatment Plant (WWTP) was conducted. Ohio EPA representatives, Ms. Michelle Sharp and Ms. Mackenzie Coughlan met with Mr. Mike Ritter and Mr. Bill Justice. The inspection included a tour of the facility and completion of a checklist designed to evaluate the major areas of the treatment plant. Our inspection findings and recommendations are summarized below.

The mixed liquor in the counter current aeration tank was a healthy brown color. The effluent from the UV disinfection tank was clear. The equalization tanks were in use and being aerated.

Sludge was observed in the drying beds. In a letter dated December 11, 2006, Mr. Eugene Toy indicated that the sludge drying beds provided 61 days of sludge storage capacity. In order for this capacity to be taken into account, the sludge must be regularly removed from the beds after it has dried. To ensure the plant has sufficient storage capacity, we request that you remove the sludge on the drying beds and properly dispose of it in a solid waste landfill.

Our review of the discharge monitoring reports covering the months of January 2008 through September 2008 for the Crestline WWTP found violations of the National Pollutant Discharge Elimination System (NPDES) permit. The specific instances of noncompliance are attached.

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Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in Part III-General conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111.

On April 17, 2008, we received an email showing the City's one combined sewer overflow (CSO) had been partially sealed with brick and mortar. Mr. Ritter showed us records that are being kept to document when the overflow is activated and that river intrusion is not occurring. Since the overflow is still in use, and no steps to permanently eliminate the CSO are being taken you are in violation of the Compliance Schedule contained in your NPDES permit.

As advised in our August 22, 2006 letter to Mr. Toy, the City is in violation of the compliance schedule contained in the NPDES permit. The proposed schedule, provided to us by Mr. Toy, completes the schedule one year late. To date we have been notified that the City has cleaned the grit out of the 18 inch trunk sewer running to the plant and on September 19, 2007, we received an email from Mr. Toy with the flow study report completed by Richland Engineering. The email indicated that there were two sources of bottlenecking that were to be investigated: 1) the force main from the lift station is only an 8-inch diameter pipe and 2) the pumps are operating at only slightly more than half of their design capacity. In addition, the email stated that smoke testing was to be done in the vicinity of the lift station and former overflow to evaluate sources of inflow and infiltration and potential solutions. In your letter dated April 10, you stated that the City had done more work investigating the pumps and was "currently and actively investigating these reasons in order that the pumps will operate as needed and expected. At this time, we have received no further communication about these investigations.

We have and continue to receive complaints about sewage in Paramour Creek from inadequate septic systems. As we have noted in the past, the city wide sanitary sewer location map from Richland Engineering Limited dated February 1994 indicates that there are areas within the City limits that are not being served by public sewer. One area is bordered on the north and east by railroad tracks and on the west by Brant St. This is the area where the complaints are located. Another area is bordered by County Line Road, Arnold St. and Valley Ave.

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These areas are a point of concern and the unsanitary conditions must be abated. Your April 10, 2008 letter states that you are working with Ms. Stephanie Zmuda at the Galion Health Department to dye test the systems and work with the residential owners to fix their septic systems. You also states that there is a "sanitary sewer project now underway" that will abate some areas mentioned above with the addition of properties on South Washington Ave., Bauer Ave., Thoman St., Patterson St., and Bibich Ct. To date we have not received any further information about how the City is working to abate these issues.

Please note that your NPDES permit expires on July 31, 2009. You should have recently received the proper applications for the renewal of your permit. The schedule of compliance included in your current permit requires that you submit information regarding your ability to meet a monthly average limit of 1.4 ng/L for mercury with your renewal application. Please ensure that this information is included with your renewal application and that we receive all of the proper forms by January 31, 2009.

Please respond, in writing, addressing the above issues within 30 days of the date of this letter. A copy of our completed inspection form is enclosed for your review.

Unfortunately, due to a lack of responsiveness and attention to these issues, we are left with no choice but to refer the City for enforcement action. If you have any questions please contact Michelle Sharp at 419-373-3019.

Yours truly,



Allen L. Rupp, P.E.
District Engineer/Section Manager
Division of Surface Water

/csl

Enclosure

pc: NWDO-DSW file w/enc.
Mike Ritter, Crestline WWTP w/enc.
Stephanie Zmuda, Galion City Health Department w/ pictures
Kate Siefert, Crawford County Health Department w pictures



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0020664	2PC00006	9/30/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Crestline WWTP 100 Westgate Drive Crestline, Ohio 44827	9:00 AM	8/1/2004
	Exit Time	Permit Expiration Date
	10:00 PM	7/31/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Mike Ritter, Supterintendent Mr. Bill Justice, Operator	419-683-2836 419-683-2836	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council City of Crestline 100 North Seltzer Street Crestline, Ohio 44827	419-683-3800	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
<input checked="" type="checkbox"/> S	Permit	<input checked="" type="checkbox"/> S	Flow Measurement	<input type="checkbox"/> N	Pretreatment
<input checked="" type="checkbox"/> M	Records/Reports	<input checked="" type="checkbox"/> S	Laboratory	<input checked="" type="checkbox"/> U	Compliance Schedule
<input checked="" type="checkbox"/> S	Operations & Maintenance	<input checked="" type="checkbox"/> M	Effluent/Receiving Waters	<input checked="" type="checkbox"/> S	Self-Monitoring Program
<input checked="" type="checkbox"/> S	Facility Site Review	<input checked="" type="checkbox"/> M	Sludge Storage/Disposal	<input type="checkbox"/> N	Other
<input checked="" type="checkbox"/> U	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
Inspector		Reviewer	
<i>Michelle M Sharp Jan 2, 2009</i> Michelle M. Sharp Division of Surface Water Northwest District Office		<i>Elizabeth A Wick 10/31/08</i> Elizabeth A. Wick, P.E. Water Quality Engineer Division of Surface Water Northwest District Office	

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... N/A
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance Schedules/Violations

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

(a) Phosphorous violations.

(b) Facility if feeding more ferric chloride.

(e) Elimination of CSO has not been completed.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... III
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: IV
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... Y
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Mostly on computer. Timeclock used to track time.
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... N
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N
- (d) CSO O&M plan provided and implemented..... N
- (e) CSOs monitored and reported in accordance with permit..... Y
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... Y

Comments/Status:

Treatment Works
(i) Shriber crosscurrent aeration has experienced electrical problems. Bar screen has been icing and breaking, the addition of a building is being considered. Two blower motors.

(j) The manual is being updated.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A

- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method: Land Apply)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... N
(Name:)
- (f) Has amount of sludge generated changed significantly since
last inspection..... Y
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... Y
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... Y
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

(f) In 2007, there was no land application due to the lack of fields.
(g) Utilizing sludge drying beds. Digesters are empty. Trying a different style of diffuser.

Section I: Self-Monitoring Program

- Flow Measurement:**
- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)

 - (b) Calibration frequency adequate Y
(Date of last calibration:)
 - (c) Secondary instruments operated and maintained..... Y
 - (d) Flow measurement equipment adequate to handle full range
of flows..... Y
 - (e) Actual flow discharged is measured..... Y
 - (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Ginosko - Everything but pH and DO
Enviroscience - Bioassay

Lab name: Ginosko and Enviroscience

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	None	None	Clear	

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
1/8/2008	001	00665	Phosphorus, Total (P)	7D Qty	5.4	8.85977
2/1/2008	001	00530	Total Suspended Solids	7D Conc	18	23.
2/1/2008	001	00530	Total Suspended Solids	7D Qty	65	168.616
6/10/2008	001	00300	Dissolved Oxygen	1D Conc	5.0	4.7
6/26/2008	001	00300	Dissolved Oxygen	1D Conc	5.0	4.9
8/1/2008	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.519
8/8/2008	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.742
8/15/2008	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.925
9/1/2008	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.26875
9/1/2008	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.508
9/9/2008	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6
9/12/2008	001	00300	Dissolved Oxygen	1D Conc	5.0	4.9

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Bypasses		
	Stormwater Overflows		
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	M	
	Pump Station		
	Ventilation		
	Bar Screen	IN	
	Disposal of Screenings	S	Landfill
	Comminutor	OUT	Back up unit
	Grit Chamber	IN	Aerated
	Disposal of Grit	S	Landfill
	Flow EQ	IN	Old aeration plant used for flow EQ
Primary	Settling Tanks		
	Scum Removal		
	Sludge Removal		
	Effluent		
Sludge Disposal	Digesters	IN	3 AEROBIC UNITS and holding tank
	Temperature and pH		
	Gas Production		
	Heating Equipment		
	Sludge Pumps	IN	2 WAS, 2 RAS
	Disposal of Sludge	S	Land application
	Sludge holding tank		
Other	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	IN	
Secondary-Tertiary List items as	Aeration tanks	IN	1 counter current tank
	Blowers	IN	
	Secondary Clarifiers	IN	2 units
Disinfection	Effluent	S	
	Disinfection System	In	UV
	Effective Dosage		
	Contact Time		
	Contact Tank	S	