



Environmental  
Protection Agency

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

Re: Erie County  
Sandusky  
NPDES Permit

May 24, 2011

Mr. Todd Roth, P.E.  
Director of Engineering Services  
222 Meigs Street  
Sandusky, Ohio 44870

Dear Mr. Roth:

On May 12, 2011, an inspection was made of the wastewater treatment facilities serving the City of Sandusky. Mr. Jeff Meinert, Superintendent, was present and provided information on plant operations. Construction of the Phase II improvements was completed at the end of 2010, when final clarifier No. 2 was brought on line. At the time of our visit, all treatment units were in operation, and a clear final effluent was observed discharging from the plant. Our comments are as follows:

- 1) Completion of the second final clarifier has allowed the plant to operate at full design capacity. Mr. Meinert has already treated up to 42 million gallons peak wet weather flow. This has reduced the frequency and volume of CSO events, but not as much as anticipated. Obstructed flow in the main interceptor has been identified as impeding drainage of the line. A contract has been issued to clean the line as soon as weather allows. Once cleaned, the interceptor should not only provide additional in line storage, but drain more freely to the plant, reducing CSO events.
- 2) A review of CSO activity indicated 31 reported events in 2010 and 12 thus far since January. CSO outfalls are being posted when active, and telephone and written notification following overflow events are being received in a timely manner. NPDES monthly discharge monitoring reports indicate two limit and one loading violation since my last inspection. A copy is included for your review.
- 3) Mercury variance limits and requirements to implement a Pollutant Minimization Plan (PMP) were incorporated into the permit last April. Refer to Part II, Item V for scheduled activities to identify and either reduce or eliminate excess sources of mercury.

Mr. Todd Roth, P.E.  
May 24, 2011  
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4) Mr. Meinert and his staff continue to operate and maintain the facilities very well, and we appreciate their dedication. The lab personnel were once again recognized by USEPA for achieving 100% compliance with the most recent USEPA laboratory quality assurance performance evaluation program # 30.

My completed inspection and Lab Criteria report is enclosed. If there are any errors, or you have any questions, please call me at (419) 373-3020 or email at [rick.zuzik@epa.state.oh.us](mailto:rick.zuzik@epa.state.oh.us).

Yours truly,

A handwritten signature in black ink, appearing to read "Richard A. Zuzik", is written over a horizontal line. The signature is stylized and somewhat cursive.

Richard A. Zuzik, MSE  
Division of Surface Water  
Enclosure

/lr

pc: Jeff Meinert, Superintendent, w/copy of report  
DSW-NWDO File

# NPDES COMPLIANCE INSPECTION REPORT

## Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
2PF00001	OH0027332	11/05/12	C	S	1

## Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Sandusky STP 304 Harrison Street Sandusky, Ohio 44870	10:00. a.m.	5-1-08
	Exit Time	Permit Expiration Date
	12:00 p.m.	7-31-12

Name(s) and Title(s) of On-Site Representative(s)  
Mr. Jeff Meinert, Superintendent

Phone Number(s)  
(419) 627-5906

## Name, Address and Title of Responsible Official

Mr. Todd Roth, P.E., Director of Engineering  
City of Sandusky  
222 Meigs Street  
Sandusky, Ohio 44870

## Phone Number

(419) 627-5831

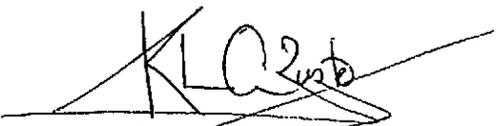
## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>S</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>  </u> Other
<u>M</u> Collection System		

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Phase II Construction completed. 2<sup>nd</sup> Final Clarifier No. 2 brought on line 12-10.

  
Richard A. Zuzik, MSE

Name(s) and Signature(s) of Inspector(s)

Ohio EPA, Northwest  
Date District Office

  
Elizabeth A. Wick, P.E.

Name and Signature of Reviewer

5/24/11, Ohio EPA, Northwest  
Date District Office

Sections E thru K: Complete on all inspections as appropriate. N/A - Not Applicable N/E - Not Evaluated

**Section E: Permit Verification**

	Yes	No	N/A	N/E
<b>INSPECTION OBSERVATIONS VERIFY THE PERMIT</b>				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<u>X</u>	___	___	
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	<u>X</u>	___	___	
(c) PRODUCT(S) AND PRODUCTION RATES CONFORM WITH PERMIT APPLICATION (INDUSTRIES)	___	___	<u>X</u>	
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT PERMIT APPLICATION/BRIEFING MEMO	<u>X</u>	___	___	
(e) TREAT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION/BRIEFING MEMO	<u>X</u>	___	___	
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION	<u>X</u>	___	___	
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES	___	___	<u>X</u>	
(h) ALL DISCHARGES ARE PERMITTED	<u>X</u>	___	___	
(I) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT	<u>X</u>	___	___	

COMMENTS/STATUS:

Second Final Clarifier on line 12-10.

**Section F: Compliance Schedules/Violations**

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE THE LAST INSPECTION(limits)	___	<u>X</u>	___	
(b) PERMITTEE IS TAKING ACTIONS TO RESOLVE VIOLATIONS	___	___	<u>X</u>	
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	<u>X</u>	___	___	
(d) COMPLIANCE SCHEDULE CONTAINED IN NPDES permit	<u>X</u>	___	___	
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE	<u>X</u>	___	___	

COMMENTS/STATUS:

All schedules completed

**Section G: Operation and Maintenance**

**TREATMENT WORKS:**

	Yes	No	N/A	N/E
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED				
(a) STANDBY POWER AVAILABLE GENERATOR <u>X</u> DUAL FEED	<u>X</u>	---	---	
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	<u>X</u>	---	---	
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	<u>X</u>	---	---	
(d) SUFFICIENT OPERATING STAFF PROVIDED # SHIFTS <u>3</u> DAYS/WEEK <u>7</u>	<u>X</u>	---	---	
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS REQUIRED BY PERMIT CLASS: <u>III</u>	<u>X</u>	---	---	
(f) ROUTINE AND PREVENTIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME	<u>X</u>	---	---	
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION	---	<u>X</u>	---	
(h) OPERATION AND MAINTENANCE MANUAL PROVIDED AND MAINTAINED	<u>X</u>	---	---	
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION	---	---	<u>X</u>	
(j) REGULATORY AGENCY NOTIFIED OF BYPASSES <u>  </u> ON MORS <u>  </u> 800 NO.	---	---	<u>X</u>	
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECTION	---	<u>X</u>	---	

**COLLECTION SYSTEM: N/A**

	Yes	No	N/A	N/E
(a) PERCENT COMBINED SYSTEM <u>80</u> %				
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSOx_ SSO_)	<u>X</u>	---	---	---
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)	---	---	<u>X</u>	---
(d) CSO O AND M PLAN PROVIDED AND IMPLEMENTED	<u>X</u>	---	---	---
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT	<u>X</u>	---	---	---
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM	---	---	---	---
(g) LIFT STATION ALARM SYSTEMS PROVIDED AND MAINTAINED	<u>X</u>	---	---	---
(h) ARE LIFT STATIONS EQUIPPED WITH PERMANENT STANDBY POWER OR EQUIVALENT	<u>X</u>	---	---	---
(i) IS THERE AN INFLOW INFILTRATION PROBLEM (SEPARATE SEWER SYSTEM) OR WERE THERE ANY MAJOR REPAIRS TO COLLECTION SYSTEM SINCE LAST INSPECTION	<u>X</u>	---	---	---
(j) ANY COMPLAINTS RECEIVED SINCE LAST INSPECTION OF BASEMENT FLOODING	<u>X</u>	---	---	---
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	---	<u>X</u>	---	---

**COMMENTS/STATUS:**

2010 - 31 CSO events  
2011 - 12 CSO events thus far with less volume

**Section H: Sludge Management**

(a) SLUDGE MANAGEMENT PLAN (SMP) N/A  
SUBMITTED DATE \_\_\_\_\_ APPROVAL # \_\_\_\_\_ NOT SUBMITTED \_\_\_ N/A \_\_\_

	Yes	No	N/A	N/E
(b) SLUDGE MANAGEMENT PLAN CURRENT	<u>x</u>	_____	_____	_____
(c) SLUDGE ADEQUATELY DISPOSED (METHOD: <u>land application</u> )	<u>x</u>	_____	_____	_____
(d) IF SLUDGE IS INCINERATED, WHERE IS ASH DISPOSED OF _____	_____	_____	_____	_____
(e) IS SLUDGE DISPOSAL CONTRACTED (NAME: <u>Fertility Builders</u> )	<u>x</u>	_____	_____	_____
(f) HAS AMOUNT OF SLUDGE GENERATED CHANGED SIGNIFICANTLY SINCE LAST INSPECTION	_____	<u>x</u>	_____	_____
(g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT	<u>x</u>	_____	_____	_____
(h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP	<u>x</u>	_____	_____	_____
(i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW	<u>x</u>	_____	_____	_____
(j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE	_____	<u>x</u>	_____	_____
(k) IS SLUDGE ADEQUATELY PROCESSED (DIGESTION, DEWATERING, PATHOGEN CONTROL)	<u>x</u>	_____	_____	_____

COMMENTS/STATUS:

**Section I: Self-Monitoring Program**

Part 1. Flow measurement

	Yes	No	N/A	N/E
(a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED & MAINTAINED <u>X</u> TYPE OF DEVICE: <u>X</u> ULTRASONIC & PARSHALL FLUME _____ ULTRASONIC & WEIR _____ WEIR _____ CALCULATED FROM INFLUENT _____ OTHER (Specify _____)	<u>X</u>	_____	_____	_____
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration <u>9-10</u> )	_____	_____	_____	_____
(c) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED _____	<u>X</u>	_____	_____	_____
(d) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOWS	<u>X</u>	_____	_____	_____
(e) ACTUAL FLOW DISCHARGED IS MEASURED	<u>X</u>	_____	_____	_____
(f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY: <u>x</u> DAILY _____ WEEKLY _____ MONTHLY _____ OTHER	_____	_____	_____	_____

Comments/Status

Influent and effluent measured  
30-32 mgd ATOV

**Part 2. Sampling**

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED BY PERMIT	<u>X</u>	___	___	___
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	<u>X</u>	___	___	___
(c) PERMITTEE USES REQUIRED SAMPLING METHOD	<u>X</u>	___	___	___
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE	<u>X</u>	___	___	___
(i) SAMPLES REFRIGERATED DURING COMPOSITING	<u>X</u>	___	___	___
(ii) PROPER PRESERVATION TECHNIQUES USED	<u>X</u>	___	___	___
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3	<u>X</u>	___	___	___
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records)	<u>X</u>	___	___	___
(f) ADEQUATE RECORDS MAINTAINED OF SAMPLING DATE, TIME, EXACT LOCATION, ETC.	<u>X</u>	___	___	___

COMMENTS/STATUS:

**Part 3. Laboratory**

	Yes	No	N/A	N/E
<b>GENERAL</b>				
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)	<u>X</u>	___	___	___
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED	<u>X</u>	___	___	___
(c) ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT	___	___	<u>X</u>	___
(d) IF (c) IS YES, ARE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT	___	___	<u>X</u>	___
(e) COMMERCIAL LABORATORY USED	<u>X</u>	___	___	___
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB TTO'S, Metals, Low level Mercury, Dioxin				
(2) LAB NAME: <u>Jones &amp; Henry Labs, Wright Street (Dioxin)</u>				
<b>QUALITY CONTROL/QUALITY ASSURANCE</b>				
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED	<u>X</u>	___	___	___
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	<u>X</u>	___	___	___
(h) ADEQUATE RECORDS MAINTAINED	<u>X</u>	___	___	___
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM DATE : <u>9/10</u> <u>X</u> SATISFACTORY    ___ MARGINAL UNSATISFACTORY				

COMMENTS/STATUS:  
DMRQA #30

**Section J: Effluent/Receiving Water Observations**

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
001	None	None	None	None	None	None	

COMMENTS/STATUS:

**Section K: Multimedia Observations**

	Yes	No	N/A	N/E
(a) ARE THERE INDICATIONS OF SLOPPY HOUSEKEEPING OR POOR MAINTENANCE IN WORK AND STORAGE AREAS OR LABORATORIES	___	<u>X</u>	___	
(b) DO YOU NOTICE STAINING OR DISCOLORATION OF SOILS, PAVEMENT, OR FLOORS	___	<u>X</u>		
(c) DO YOU NOTICE DISTRESSED (UNHEALTHY, DISCOLORED, DEAD) VEGETATION	___	<u>X</u>		
(d) DO YOU SEE UNIDENTIFIED DARK SMOKE OR DUSTCLOUDS COMING FROM SOURCES OTHER THAN SMOKESTACKS	___	<u>X</u>		
(e) DO YOU NOTICE ANY UNUSUAL ODORS OR STRONG CHEMICAL SMELLS	___	<u>X</u>		
(f) DO YOU SEE ANY OPEN OR UNMARKED DRUMS, UNSECURED LIQUIDS, OR DAMAGED CONTAINMENT FACILITIES?	___	<u>X</u>		

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:

Section L: Complete as appropriate for sampling inspections  
**DO NOT ATTACH THIS PAGE WHEN COMPLETING REPORTS FOR EVALUATION INSPECTIONS**

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**Section L: Sampling Procedures (for CSIs)**

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- GRAB SAMPLES OBTAINED
- COMPOSITE OBTAINED
- COMPOSITING FREQUENCY \_\_\_\_\_ PRESERVATION
- FLOW PROPORTIONED SAMPLE OBTAINED
- AUTOMATIC SAMPLER USED
- SAMPLE SPLIT WITH PERMITTEE
- CHAIN OF CUSTODY EMPLOYED
- SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

SAMPLE REFRIGERATED DURING COMPOSITING:  Yes  No  
SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE  
COMMENTS:

1. GUIDE - VISUAL OBSERVATION - UNIT PROCESSES

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 Prot.	S	
	Safety Features	S	
	Bypasses	-	
	Stormwater Overflows	OUT	15 CSO's - lesser volume when discharging
	Alternate Power Source	S	Recently used, worked perfect
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	4 major, 12 minor
	Ventilation	-	
	Bar Screen	IN	3 automatic
	Disposal of Screenings	S	Landfill
	Comminutor	-	
	Grit Chamber	IN	3 tanks, aerated
	Disposal of Grit		
Primary	Settling Tanks	IN	3 round
	Scum Removal	S	
	Sludge Removal	S	
	Effluent	S	Normal-grey
Sludge Disposal	Digesters	IN	4 primary, 2 secondary, 1 gravity thickener
	Temperature and pH	S	
	Gas Production	S	
	Heating Equipment	S	
	Sludge Pumps	IN	5 WAS, * RAS
	Drying Beds	-	
	Vacuum Filter	-	
	Disposal of Sludge	S	Land applied
Centrifuge	IN		
Other	Flow Meter and Recorder	IN	Influent & Effluent
	Records	S	
	Lab Controls	S	
	Chemical Treatment	S	Ferrous at aerated grit
Secondary-Tertiary List items as required	Final Settling	IN	2 high rate clarifiers
	Aeration	IN	3 sets
	Effluent pumps	IN	
Disinfection	Effluent	S	Very Clear
	Disinfection System	IN	V.V. 2 units
	Effective Dosage	-	
	Contact Time	-	
	Contact Tank	-	
	Dechlorination	-	

5/10 - 5/11

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PF00001*ND	October 2010	001	61942	pH, Minimum	1D Conc	6.5	6.4	10/24/2010
2PF00001*ND	March 2011	001	00530	Total Suspended Solids	7D Conc	29	33.6	3/8/2011
2PF00001*ND	March 2011	001	00530	Total Suspended Solids	7D Qty	2420	4412.78	3/8/2011