



State of Ohio Environmental Protection Agency

Northwest District Office

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www.epa.state.oh.us

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

Re: Erie County
Sawmill Creek WWTP
NPDES No.2PB00056

September 21, 2007

Mr. Jack Meyers, PE
Sanitary Engineer
Erie County Department of Environmental Services
P.O. Box 469
Huron, Ohio 44839

Dear Mr. Meyers:

On June 26, 2007, an inspection was made of the Sawmill Creek wastewater treatment plant in conjunction with the upcoming renewal of the NPDES permit, which expires August 31, 2007. Mr. Gary Eckler, Superintendent, was present and provided information on plant operations. The inspection consisted of an interview utilizing a checklist covering major areas of facility operations, and a walkthrough of the entire plant. At the time of our visit, a clear final effluent was being discharged. Our comments and recommendations are as follows:

1) This facility is fast approaching it's 1.2 MGD average daily design treatment capacity. Recent PTI's have indicated current and proposed average daily flows at approximately 1 MGD. We recently requested your plan to address this issue and you indicated that the new service agreement with Sandusky allows for additional flow to be transported for treatment, and you intend on directing more flow there as needed. However, significant capacity will not be available until Sandusky's Phase II improvements are completed. Typically, plants with 1 mgd or greater average daily flow are considered "major" facilities, and subject to additional requirements. Due to the above noted additional flow, we will be recommending that Sawmill Creek be considered a "major" discharger for all future NPDES permit renewals.

Another related issue continues to be the wet weather flow handling capabilities when Sandusky notifies you to shut off flow to prevent overflows at their Pier Track lift station.

NPDES permit monthly operating reports indicate 12 flow equalization basin overflows since September, 2002, the effective date of the permit. 7 of the 12 events have led to final effluent violations, primarily phosphorus loading, due to increased flow. (see enclosure). There have also been 5 occasions when the excessive hydraulic flow has resulted in final effluent overflow from the final contact tank onto the ground. Mr. Eckler has bermed the northern property line to prevent overland flow onto the adjacent marina, and a catch basin draining to the channel has been installed in that area. Once again, you indicated that this arrangement will not significantly change until Sandusky Phase II is completed. Beyond 2013, a trunk sewer upgrade has already been installed, which lays the groundwork to transport future additional flow to the Huron Basin plant, which by then would be expanded. We will be including a five year schedule of

Mr. Jack Meyers
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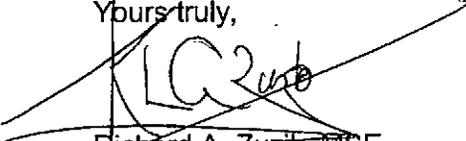
compliance in the renewal to eliminate the final contact tank overflows. Since flow from the equalization tank is considered a secondary bypass, we will also include a schedule of compliance to conduct a comprehensive analysis of all feasible alternatives to eliminate the bypassing. A separate table will be included to monitor the flow equalization tank discharge.

2) The renewal will contain a 3 year compliance schedule to allow for the transition from Fecal coliform to the new E. coli bacteria standard, which is now required on all direct Lake Erie discharges.

3) A compliance schedule with a variance option will also be included to comply with the new Lake Erie mercury standard by November, 2010.

You will be receiving a draft copy of the permit renewal in the near future. You should review it carefully, as there is a 30 day comment period to respond to any permit conditions. You should continue to operate under the expired permit until such time the renewal becomes effective. Our completed inspection report is enclosed. If you have any questions, please feel free to call me at (419) 373-3022, or email at rick.zuzik@epa.state.oh.us

Yours truly,



Richard A. Zuzik, MSE
Division of Surface Water

/lb

Enclosure

pc: Gary Eckler w/enclosures

~~NWDO:File~~

Sawmill Creek
9/1/02 - 4/1/07

2PB00056' December 2003	001	00665	Phosphorus, Total (P)	30D Qty	4.6	5.06883	12/1/2003
2PB00056' March 2004	001	00665	Phosphorus, Total (P)	30D Qty	4.6	7.13455	3/1/2004
2PB00056' March 2004	001	00552	Oil and Grease, Hexane	1D Conc	10	10.2	3/30/2004
2PB00056' January 2005	001	00530	Total Suspended Solids	30D Qty	137	138.078	1/1/2005
2PB00056' January 2005	001	00530	Total Suspended Solids	7D Qty	205	225.873	1/8/2005
2PB00056' January 2005	001	00665	Phosphorus, Total (P)	30D Qty	4.6	5.50187	1/1/2005
2PB00056' January 2005	001	00665	Phosphorus, Total (P)	7D Qty	6.9	8.04064	1/8/2005
2PB00056' June 2004	001	00665	Phosphorus, Total (P)	30D Qty	4.6	4.73106	6/1/2004
2PB00056' June 2004	001	00665	Phosphorus, Total (P)	7D Qty	6.9	7.46523	6/15/2004
2PB00056' December 2004	001	00300	Dissolved Oxygen	1D Conc	5.0	4.1	12/31/2004
2PB00056' February 2005	001	00665	Phosphorus, Total (P)	30D Qty	4.6	7.2775	2/1/2005
2PB00056' February 2005	001	00665	Phosphorus, Total (P)	7D Qty	6.9	8.40701	2/8/2005
2PB00056' October 2005	001	00665	Phosphorus, Total (P)	30D Qty	4.6	5.31664	10/1/2005
2PB00056' January 2006	001	00530	Total Suspended Solids	7D Conc	45	61.5	1/1/2006
2PB00056' January 2006	001	00530	Total Suspended Solids	7D Qty	205	327.112	1/1/2006
2PB00056' June 2006	001	00665	Phosphorus, Total (P)	7D Qty	6.9	10.1560	6/22/2006

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
<u>2PB00056</u>	<u>OH 0053082</u>	<u>07/06/26</u>	<u>C</u>	<u>S</u>	<u>1</u>

Section B: Facility Data

Name and Location of Facility Inspected Erie County Sawmill Creek 117 N Rye Beach Rd Huron, Ohio 44839	Entry Time 9:00 a.m.	Permit Effective Date 09/01/02
	Exit Time 10:30 a.m.	Permit Expiration Date 08/31/07

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Gary Elker, Superintendent	(419) 433-7303

Name, Address and Title of Responsible Official	Phone Number
Mr. Jack Meyers, PE Erie county Sanitary Sewer PO Box 370 Huron, Ohio 44839	419-433-7303

Section C: Areas Evaluated During Inspection

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

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

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

Richard A. Zuzik, MSE, Ohio EPA, _____, Northwest
 Name(s) and Signature(s) of Inspector(s) Date District Office

Elizabeth A. Wick, P.E., Ohio EPA, _____, Northwest
 Name and Signature of Reviewer 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
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(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:

Section F: Compliance Schedules/Violations

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE THE LAST INSPECTION	___	<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 <u>NPDES Permit</u>	___	___	___	___
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE	___	___	<u>X</u>	___

COMMENTS/STATUS:

Time extension requested for headworks improvements.

Final table ammonia being met

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>1</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>X</u> 800 NO.	<u>X</u>	___	___	___
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECTION	<u>X</u>	___	___	___

COLLECTION SYSTEM:

	Yes	No	N/A	N/E
(a) PERCENT COMBINED SYSTEM <u>0</u> %				
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSO <u> </u> SSO <u> </u>)	___	<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	___	<u>X</u>		
(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:

Plant experiences hydraulic over loads when City of Sandusky shuts off flow at Pier Track Pump Station during high rain events.

Section H: Sludge Management

(a) SLUDGE MANAGEMENT PLAN (SMP)
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>Mid Ohio</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:

60 days storage at plant. Hauled to Huron Basin PUTW. When sites unavailable.

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>	<u>X</u>	_____	_____	_____
TYPE OF DEVICE: _____ ULTRASONIC & PARSHALL FLUME <u>X</u> ULTRASONIC & WEIR _____ WEIR _____ CALCULATED FROM INFLUENT <u>X</u> OTHER (Specify) <u>magmeter</u>				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration <u>7/06</u>) <u>X</u>	<u>X</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:

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
GENERAL				
(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	___	___	___	___
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB <u>Mercury, total, phenolics, metals, oil & grease, Nitrate-Nitrite</u>	___	___	___	___
(2) LAB NAME: <u>Jones & Henry Labs</u>	___	___	___	___

QUALITY CONTROL/QUALITY ASSURANCE

(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 : ___ SATISFACTORY ___ MARGINAL ___ UNSATISFACTORY	___	___	___	___

COMMENTS/STATUS:

Samples analyzed at Huron Basin lab.

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:

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

Form Approved

OMB No. 158-R0035

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	OUT	
	Stormwater Overflows	-	
	Alternate Power Source	S	Diesel Generator
	Flow EQ Basin	OUT	1 MG-Overflow blends w/final effluent for U.V.disinfection
Preliminary	Maintenance of Collection Systems	S	High inflow/filtration
	Pump Station	IN	Eastwych Station
	Ventilation	IN	
	Bar Screen	IN	1 Roto Mat fine screen, 1 manuel bypass
	Disposal of Screenings		
	Comminutor		
	Grit Chamber		
	Disposal of Grit	S	Landfill
Primary	Raw Sewage pumps	S	
	Settling Tanks		
	Scum Removal		
	Sludge Removal		
	Effluent		
	Equalization		
Sludge Disposal	Digesters	IN	3-aerated
	Temperature and pH	-	
	Gas Production	-	
	Heating Equipment	-	
	Sludge Pumps	IN	2
	Drying Beds	-	
	Vacuum Filter	-	
	Disposal of Sludge	S	Land Applied
Bett Thickener	IN		
Other	Flow Meter and Recorder		
	Records		
	Lab Controls		
	Chemical Treatment	IN	Ferrous chloride added for phosphoreus
Secondary-Tertiary List items as	Pre Aeration	IN	1 Tank
	Arcation	IN	4
	Final Clarifiers	IN	2, 1 used normally
Disinfection	Effluent	S	Clear
	Disinfection System	IN	U.V.
	Effective Dosage	-	
	Contact Time	-	
	Contact Tank	IN	
	Dechlorination		