



**Environmental
Protection Agency**

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

Re: Fulton County
Delta WWTP
NPDES Permit
Notice of Violation

October 6, 2010

Mr. Larry Born
Superintendent of Public Utilities
Village of Delta
401 Main Street
Delta, Ohio 43515

Dear Mr. Born:

On September 30, 2010, I conducted an inspection of the Delta Wastewater Treatment Plant. You were present and provided information concerning operation and maintenance of the facility. All treatment units were in operation during the inspection and the effluent observed into Bad Creek was clear, colorless, and had no noticeable odor. Rags and debris were observed around the discharge pipe.

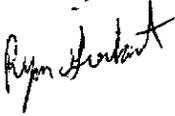
It was noted that the sludge mixing pumps for the SBR units have been installed and are in operation for all three SBR units. It was also noted that the alum feed pump has been set up to feed alum when the influent pumps turn on. At the time of the inspection the alum feed pump was turned off because the facility is evaluating the treatment plant's phosphorus removal capabilities.

A review of the discharge monitoring reports (DMRs) from June 2010, to September 2010, shows that there have been numerous effluent limit violations. The specific instances of noncompliance are attached on a separate sheet. Further review of your self-monitoring reports for the previous six months, ending in August 2010, indicates that you are in significant non-compliance (SNC) with an effluent limitation contained in your NPDES permit. The specific instance of SNC is attached on a separate sheet. It is noted that you sent an email on 9/15/2010 indicating that the fecal violations in August were due to a solenoid valve malfunctioning in the chlorine feed system.

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The completed compliance evaluation inspection report is enclosed. If you have any questions, please contact me at (419) 373-3053.

Sincerely,



Ryan Gierhart
Division of Surface Water

/lir

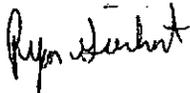
Enclosures

pc w/enclosures: Mayor and Council
cDSW-File-NWDO

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Sincerely,



Ryan Gierhart
Division of Surface Water

/llr

Enclosures

pc w/enclosures: Mayor and Council
DSW File-NWDO

bc w/enclosures.: Bill Fischbein, Ohio EPA Legal

State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 2PB00003 | OH0020974 | 9/30/2010 | C | S | 1 |

| Section B: Facility Data | | |
|--|--|--|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| Village of Delta WWTP 516 Locust Street Delta, OH 43515 | 8:30 Am | June 1, 2007 |
| | Exit Time 11:00 Am | Permit Expiration Date May 31, 2012 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Mr. Larry Born – Superintendent of Public Utilities | (419) 822 – 3244 (WWTP) (419) 822 – 4143 (WTP) (419) 822 – 5168 (Fax) (419) 583 – 0054 (Cell – Larry) Lborn@villageofdelta.org | |
| Name, Address and Title of Responsible Official | Phone Number | |
| Mayor and Council Village of Delta 401 Main St. Delta, OH 43515 | (419) 822 – 5300 (419) 822 – 3190 | |

| 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 | S | Laboratory | N | Compliance Schedule |
| S | Operations & Maintenance | S | Effluent/Receiving Waters | N | Self-Monitoring Program |
| S | Facility Site Review | S | Sludge Storage/Disposal | N | Other |
| S | Collection System | | | | |

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

The sludge mixing pumps have been installed and are in operation in all 3 SBR units. The chlorine feed system has been repaired with the failed valves being replaced. The laboratory fridge needs to be properly maintained.

| Inspector | Reviewer |
|--|---|
| <i>Ryan Gierhart</i> 10/4/10 | <i>Elizabeth A. Wick</i> 10/4/10 |
| Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office | 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) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

| |
|--|
| |
|--|

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES permit
- (f) Permittee is in compliance with schedule..... N
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator or dual feed Y

i. What does the back-up power source operate.....

Generator can run the whole plant

ii. How often is the generator tested under load.....

Once per year

(b) Which components have an alarm system available for power or equipment failures.....

The main power supply is telemetered
High water alarms in wet wells

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... Y

(e) Any major equipment breakdown since last inspection..... Y

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:

The solenoid valves for the chlorine system failed and chlorine was not being properly fed to the contact tank.

Section G: Operation & Maintenance

Record Keeping/Operator of Record:

(a) Wastewater Treatment Works classification (OAC 3745-7)..... Y

(b) Operator of Record holds unexpired license of class required by Permit..... Y

(c) Copy of certificate of Operator of Record displayed on-site..... Y

(d) Has the Operator of Record submitted an ORC Notification form.. Y

(e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y

- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hard bound book
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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 operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... Y
 - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications 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

Comments/Status:

Section G: Operation & Maintenance cont.

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 0
 - ii. How many pump stations have telemetered alarms..... 4
 - iii. How many pump stations have operable alarms..... 4
- (b) Any chronic collection system overflows since last inspection..... Y
- (c) Regulatory agency notified of all overflows..... Y
- (d) CSOs in the collection system...if so, what is the LTCP status..... Y

Facility is behind schedule on the LTCP. Jefferson Street and Snake Bite CSO's have had chronic overflows.
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... Y

- (g) RDII Program established and active..... N/A
- (h) Any WIB complaint received since last inspection..... Y
- (i) Is there a WIB response plan..... Y
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

Comments/Status:

Flow monitoring of CSO's performed by Poggemeyer Design Group from February 2010 to May 2010

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

| Pathogen Reduction Alternative | 84370 Vector Attraction Reduction Options | | | | | | | | | |
|---|--|--|---|--|---|----------------------------|---|--|-------------------------------------|-------------------------------------|
| | Option 1 -38% Volatile Solids Reduction | Option 2 -Anaerobic Bench Scale Analysis | Option 3 - Aerobic Bench Scale Analysis | Option 4 - Specific Oxygen Uptake Rate | Option 5 - Aerobic Time and Temperature | Option 6 - Alkali Addition | Option 7 - >75% Percent Solids without Unstabilized | Option 8 - >75% Percent Solids with Unstabilized | Option 9 - Land Injection | Option 10 - Immediate Incorporation |
| Alternative 1 - Geometric Mean of Seven Fecal Samples (84369) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Alternative 2 - Aerobic Digestion (46396) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alternative 2 - Air Drying (46396) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alternative 2 - Anaerobic Digestion (46396) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alternative 2 - Composting (46396) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alternative 2 - Lime Treatment (46396) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alternative 3 - Approved Equivalent Process | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- (b) Has amount of sludge generated changed significantly since the last inspection..... Y
- (c) How much sludge storage is provided at the plant.....

120 days
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

Comments/Status:

Section II: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

Ultrasonic level with weir. Totalizer
- (b) Flow meter calibrated annually Y
 (Date of last calibration: 4/15/2010)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

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
 (see GLC page)
- (d) 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

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

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable:
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y (see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, O&G, Nitrate + Nitrite, Cyanide

Lab name: Jones and Henry, A and L Great Lakes,

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Facility was not aware of participating in the assurance performance sampling. The facility planned on contacting contract lab for their performance sampling results. The lab refrigerator needs to have a temperature log kept and have the thermometer calibrated annually with a NIST traceable thermometer.

Section J: Effluent/Receiving Water Observations

Outfall # 2PD00016001

Outfall Description: Outfall observed was clear, colorless with no noticeable odor. Rags and debris were observed deposited around the discharge pipe

Receiving Stream: Bad Creak

Receiving Stream Description: Stream appeared clear with steady flow.

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

Get New Data

| Permit No | Reporting Period | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|---------|----------------|-------------------------|------------|-------|----------------|----------------|
| 2PB00003*LD | July 2010 | 001 | 00530 | Total Suspended Solids | 30D Conc | 20 | 59.3636 | 7/1/2010 |
| 2PB00003*LD | July 2010 | 001 | 00530 | Total Suspended Solids | 30D Qty | 55 | 161.524 | 7/1/2010 |
| 2PB00003*LD | July 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3) | 30D Conc | 1.6 | 5.55636 | 7/1/2010 |
| 2PB00003*LD | July 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3) | 30D Qty | 4.4 | 13.5956 | 7/1/2010 |
| 2PB00003*LD | July 2010 | 001 | 00530 | Total Suspended Solids | 7D Conc | 30 | 118.6 | 7/22/2010 |
| 2PB00003*LD | July 2010 | 001 | 00530 | Total Suspended Solids | 7D Qty | 82 | 332.046 | 7/22/2010 |
| 2PB00003*LD | July 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3) | 7D Conc | 2.4 | 11.312 | 7/22/2010 |
| 2PB00003*LD | July 2010 | 001 | 00610 | Nitrogen, Ammonia (NH3) | 7D Qty | 6.6 | 28.5662 | 7/22/2010 |
| 2PB00003*LD | August 2010 | 001 | 31616 | Fecal Coliform | 30D Conc | 1000 | 5690.81 | 8/1/2010 |
| 2PB00003*LD | August 2010 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 10000. | 8/8/2010 |
| 2PB00003*LD | August 2010 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 10000. | 8/15/2010 |
| 2PB00003*LD | August 2010 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 10000. | 8/22/2010 |

Get New
Data

Get Detail
for Selected
Permit

Facilities in Significant Non-Compliance **

Period: Mar-10 Aug-10

| County | Permit # | Facility Name | Major | Station Code | Param Code | Parameter Name | Max % Exceed | # Months Signif Exceed (1)** | # Months Exceed (2)** |
|--------|----------|---------------|-------|--------------|------------|-------------------------|--------------|------------------------------|-----------------------|
| Fulton | 2PB00003 | Delta STP | | | 1 00530 | Total Suspended Solids | 304.9 | 3 | 4 |
| Fulton | 2PB00003 | Delta STP | | | 1 00610 | Nitrogen, Ammonia (NH3) | 371.3 | 2 | 2 |