



Environmental
Protection Agency

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

Re: Notice of Violation
Fulton County
Delta WWTP
NPDES Permit

May 27, 2011

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

Dear Mr. Born:

On May 12, 2011, 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.

It was noted that the solenoid valves on the chlorine feed system were leaking. The Solenoid valves have been replaced several times in the past year because of leaking. You stated that the manufacturer has been contacted and you are working on a solution.

A review of the discharge monitoring reports (DMRs) from December 2010, to May 2011, 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 April 2011, indicates that you are in significant non-compliance (SNC) with several effluent limitations contained in your NPDES permit. The specific instances of SNC are attached on a separate sheet.

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

Sincerely,

Ryan Gierhart
Division of Surface Water

/llr

Enclosures

pc w/encl: Mayor and Council
(DSW-NWDO File - 3)
bc w/encl.: Bill Fischbein, Ohio EPA Legal



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

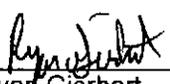
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PB00003	OH0020974	5/12/2011	C	S	1

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	1:00 pm	June 1, 2007
	Exit Time 3:00 pm	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 solenoid valves for the chlorine feed system were leaking. The valves have been replaced several times in the past year because they have leaked. The failing valves do not allow for the proper dosage of chlorine into the system. It was noted that the facility has been having an issue with SBR Unit # 3. A high MLSS in the unit is causing a poor settling sludge with solids carrying over in the effluent. The facility is trying to evaluate the cause of the high MLSS.

Inspector	Reviewer
 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
5-24-2011 Date	5/23/11 Date

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.....

Every Week

(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
 Alarms for SBR are tied into PLC

- (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..... Y

Comments/Status:

The solenoid valves for the chlorine system failed and chlorine is not being properly fed to the contact tank. The facility has had heavy flows to the plant that have caused loading issues and SBR Unit # 3 has had sludge issues.

Section G: Operation & Maintenance con t

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 con't

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.
- (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:

CSOs are monitored visually by staff.

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.

- (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:

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"/>

It was noted during the inspection that with the new sludge rules a physical screening device will be needed to land apply sludge. The screening requirement will be effective on July 1, 2015.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
- (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
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance

- Preservation
- Interferences
- Apparatus and Materials
- Reagents
- 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:

The facility has developed temperature logs for the incubator and lab fridge.

Section J: Effluent/Receiving Water Observations

Outfall # 2PD00016001

Outfall Description: Outfall observed was clear, colorless with no noticeable odor.

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

Get Detail
for Selected
Permit

Facilities in Significant Non-Compliance **

Period: Nov-10 Apr-11

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	648.1	5	5
Fulton	2PB00003	Delta STP			1 00610	Nitrogen, Ammonia (NH3)	118.5	2	4

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PB00003*LD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	7.2	10.6908	12/1/2010
2PB00003*LD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.8	12.725	12/15/2010
2PB00003*LD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.8	16.6	12/22/2010
2PB00003*LD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	7.2	14.28	1/1/2011
2PB00003*LD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.8	23.6	1/1/2011
2PB00003*LD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	29.7	35.6588	1/1/2011
2PB00003*LD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.8	14.6	1/8/2011
2PB00003*LD	January 2011	001	00530	Total Suspended Solids	7D Conc	45	67.	1/15/2011
2PB00003*LD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.8	13.52	1/22/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	30D Conc	30	84.3333	2/1/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	7D Conc	45	68.	2/1/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	30D Qty	82	307.654	2/1/2011
2PB00003*LD	February 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	7.2	7.92929	2/1/2011
2PB00003*LD	February 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	10.8	13.4333	2/1/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	7D Conc	45	184.333	2/15/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	7D Qty	124	927.674	2/15/2011
2PB00003*LD	February 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	29.7	30.4573	2/15/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	7D Conc	45	59.3333	2/22/2011
2PB00003*LD	February 2011	001	00530	Total Suspended Solids	7D Qty	124	200.033	2/22/2011
2PB00003*LD	March 2011	001	00530	Total Suspended Solids	30D Qty	82	103.709	3/1/2011
2PB00003*LD	March 2011	001	00530	Total Suspended Solids	7D Qty	124	143.763	3/1/2011
2PB00003*LD	March 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	19.8	21.7866	3/1/2011
2PB00003*LD	March 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	29.7	31.8569	3/1/2011
2PB00003*LD	March 2011	001	80082	CBOD 5 day	30D Qty	66	70.6218	3/1/2011
2PB00003*LD	March 2011	001	00530	Total Suspended Solids	7D Qty	124	221.378	3/8/2011
2PB00003*LD	March 2011	001	80082	CBOD 5 day	7D Qty	99	190.177	3/8/2011
2PB00003*LD	April 2011	001	00530	Total Suspended Solids	30D Qty	82	156.483	4/1/2011
2PB00003*LD	April 2011	001	00530	Total Suspended Solids	7D Qty	124	284.338	4/8/2011
2PB00003*LD	April 2011	001	00530	Total Suspended Solids	7D Qty	124	132.518	4/15/2011
2PB00003*LD	April 2011	001	00530	Total Suspended Solids	7D Qty	124	133.333	4/22/2011