



**Environmental  
Protection Agency**

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

Re: Notice of Violation  
Fulton County  
City of Wauseon  
NPDES Permit

September 9, 2011

Mr. Dave Pike  
WRP Superintendent  
City of Wauseon  
230 Clinton Street  
Wauseon, Ohio 43567

Dear Mr. Pike:

On August 24, 2011, I conducted a compliance inspection of the City of Wauseon's wastewater treatment plant (WWTP). You were present and provided information regarding the operation of the WWTP.

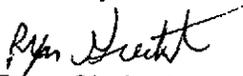
At the time of inspection, all required treatment processes and associated equipment were in operation and the discharge to North Turkeyfoot Creek was clear with some visible suspended solids, colorless, and had no noticeable odor.

It was noted during the inspection that the north and south sewer interceptor diversion chambers were overflowing to the wet weather EQ basin pump station. The EQ basin's water level was relatively low with adequate storage capacity available. A rainfall derived inflow infiltration (RDII) program was discussed during the inspection. It was recommended that an RDII reduction should be focused on to help reduce the hydraulic loading to the EQ basin and WWTP facility.

A review of the discharge monitoring reports (DMRs) from September 2010 to August 2011 shows that there have been several effluent limit violations. The specific instances of non-compliance are enclosed on a separate sheet.

The completed inspection report is enclosed. If there are any questions, please contact me at 419-373-3053.

Sincerely, —

  
Ryan Gierhart  
Division of Surface Water

/jlm

Enclosures

pc: Mayor and Council

(NWDO - DSW File)

Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402-9398

419 | 352 8461  
419 | 352 8468 (fax)  
www.epa.ohio.gov

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	Well kept and clean.
	Buildings	S	Very clean. Nicely painted.
	Potable Water Supply Protection	S	Backflow preventers.
	Safety Features	S	Fencing and guard rails.
	Bypasses		
	Stormwater Overflows	NE	Not evaluated. Checked in storm events during working hours.
	Alternate Power Source	S	Diesel generator. Ran once per week.
Preliminary	Maintenance of Collection Systems	NE	
	Pump Station	IN	Two screw pumps. One in operation/one on standby. 1-3 MGD 2-4 MGD
	Ventilation	S	
	Bar Screen	IN	Used for bypass of fine filter screens. Fine screens on a timer/flow activated.
	Disposal of Screenings	S	Landfill.
	Comminutor	NA	
	Grit Chamber	IN	Aerated. Grey color.
	Disposal of Grit	S	Landfill.
	Septage	IN	Can go to digester, normally goes to screw pumps for full treatment at plant.
	EQ Basin	IN	Low level in basin receiving overflow from interceptors.
Primary	Settling Tanks	IN	Two clarifiers. Grey color and slightly turbid.
	Scum Removal	IN	
	Sludge Removal	IN	
	Effluent	S	Clear to grey color. Slightly turbid effluent.
	Scum Pumps	IN	Two. Pump to scum screen. 1 pump is out for repairs.
Sludge Disposal	Digesters	IN	Three tanks - Primary, Secondary, and Storage. 4 <sup>th</sup> storage tank under const.
	Temperature and pH	NE	
	Gas Production	S	Methane is burnt in heat exchanger/waste burner.
	Heating Equipment	IN	Heat exchanger.
	Sludge Pumps	IN	Two sludge pumps, two return pumps, one waste pump, two digester pumps, one heat exchanger recirculation pump, and one primary recirculation pump.
	Disposal of Sludge	S	Land application.
Other	Flow Meter and Recorder	IN	Ultrasonic & weir. Totalizer.
	Records	NE	
	Lab Controls	NE	
	Chemical Treatment	IN	Alum
	Automatic Samplers	IN	Three automatic samplers are used throughout treatment for QA/QC.
Secondary-Tertiary <small>List items as</small>	Trickling Filters	IN	Two filters. 14ft of media, four distribution arms. Operated in parallel.
	Solids Contact Tank	IN	Light brown color. Good aeration. Add Alum
	Blowers	IN	Two blowers. One off, Used for Grit Chamber and Solids Tank.
	Final Settling	IN	Two Clarifiers. Both in service. Very clear in tank with some suspended solids.
	Pumps	IN	Six lift and recirculation pumps. Flow based operation 2 <sup>nd</sup> pump on at 1.5 mgd
Disinfection	Effluent	S	Clear and colorless with no odors.
	Disinfection System	IN	Chlorine gas.
	Effective Dosage	NE	
	Contact Time	NE	
	Contact Tank	IN	Clear.
	Dechlorination	IN	Sulfur dioxide gas.
	Post Aeration	IN	Step aeration at outlet of contact tank.

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit type	Limit	Reported Value	Violation Date
2PD00016*ID	September 2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.6	9/8/2010
2PD00016*JD	May 2011	001	01119	Copper, Total Recovera	30D Qty	0.125	.2187	5/1/2011
2PD00016*JD	May 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.00006	5/1/2011
2PD00016*JD	June 2011	001	01119	Copper, Total Recovera	30D Conc	22.0	24.	6/1/2011



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
2PD00116	OH0023400	8/24/2011	C	S	1

**Section B: Facility Data**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Wauseon Water Reclamation Plant 945 East Leggett Street Wauseon, OH 43567	1:00 pm	August 1, 2009
	Exit Time	Permit Expiration Date
	3:20 pm	January 31, 2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Dave Pike – WRP Superintendent	(419) 335 – 3026	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Dennis Richardson – Public Service Director 230 Clinton Street Wauseon, OH 43567	(419) 335 – 9871	

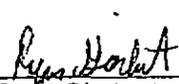
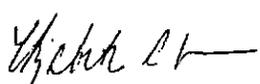
**Section C: Areas Evaluated During Inspection**

Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

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

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

EQ Basin is completed. South Sludge holding tank is close to completion. The secondary digester has been rehabilitated working on completing rehabilitation of primary digester. Standard Operation Procedures(SOPs) have been developed for all parameters except for Ecoli, and appear to be well written.

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
9/18/11 Date	9/7/11 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..... N
- (b) Appropriate Non-compliance notification of violations..... N/A
- (c) Permittee is taking actions to resolve violations..... N/A
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES permit
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

**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 entire plant.

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

The generator is tested weekly to ensure that it runs but there is no set schedule for testing the generator under load. The facility was running plant under generators for test during inspection.

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

All major treatment components have alarms. An alarm is being added for overflows at plant influent CSO.

- (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..... N
- (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

**Section G: Operation & Maintenance cont**

**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)

Hardbound books

- (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:**

Log book: Timesheets are used to keep track of arrival and departure time at plant. Plant has daily and weekly check lists and a maintenance log book for maintenance and repairs. Lab results kept on bench sheets.

**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.....2
  - ii. How many pump stations have telemetered alarms.....2
  - iii. How many pump stations have operable alarms.....2
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... Y
- (d) CSOs in the collection system....if so, what is the LCTP status..... Y
  - EQ Basin Construction completed. Post construction monitoring phase in process.
- (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
- (h) Any WIB complaint received since last inspection..... N
- (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:**

2 CSO's are monitored by staff gauges. 3<sup>rd</sup> CSO is monitored by weir and ultrasonic flow meter.

**Section H: Sludge Management**

- (a) Method of Sludge Disposal...  Land Application

Haul to Another NPDES Permittee

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 checked="" 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"/>

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..... N
- (c) How much sludge storage is provided at the plant.....
- (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..... Y
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

**Comments/Status:**

Facility applies sludge and verifies isolation distances are maintained.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

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

Ultrasonic and V-Weir
- (b) Flow meter calibrated annually ..... Y  
(Date of last calibration: 5/2011)
- (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
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

- Reagents

*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. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (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

Lab name: Ginosko Laboratory

*Discharge Monitoring Report Quality Assurance (DMRQA)*

- (a) Participation in latest USEPA quality assurance performance sampling..... Y  
Date: 8/2011
- (b) Were any parameters "Unsatisfactory"..... Y
- (c) Reasons for "Unsatisfactory" parameters.....

Ginosko Lab had some metals out of limits. Facility is following up with Ginosko had limits out of compliance.

**Comments/Status:**

Ecoli test procedure was reviewed during the inspection. The refrigerator thermometer needs to be calibrated annually with a NIST traceable thermometer. Standard Operation Procedures (SOPs) appeared to be well written. Ecoli SOP is in process of being written because it is a new measurement parameter.

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

Outfall # 2PD00016001

Outfall Description: Outfall observed was clear with some suspended solids, colorless with no noticeable odor

Receiving Stream: North Turkeyfoot Creek

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