



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: **Notice of Violation**
Hardin County
Ada WWTP
NPDES Permit

August 14, 2007

Mayor and Council
Village of Ada
P.O. Box 292
Ada, Ohio 45810

Dear Mayor and Council:

On July 27, 2007, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Ada Wastewater Treatment Plant. Mr. Phil Epley was present and provided information on operation and maintenance at the plant. The inspection included a tour of the plant and completion of the enclosed inspection checklist.

During our visit, all major treatment units were in operation. The final effluent discharging to Grass Run Creek was clear. However, no samples were taken to verify compliance with permit limits.

As discussed in our previous inspection letter (dated June 22, 2006), the design flow of the wastewater treatment plant is 0.82 million gallons per day (MGD). The average daily flow from the plant from June 2006, to May 2007 was 0.996 MGD. We strongly recommend that the plant capacity be evaluated to determine whether a plant expansion or increase in design flow is warranted. This evaluation should also include the sludge holding capacity at the wastewater treatment plant, since the Village does not have enough capacity to get through periods of time when access to land application fields is limited.

Since our last inspection, multiple effluent loading limit violations have been reported. If these loading violations continue with no actions being taken for resolution, we will have no choice but to recommend escalated enforcement action to achieve compliance.

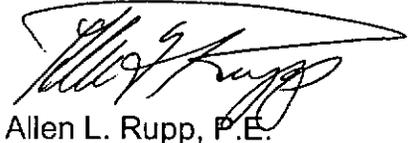
Please be aware that new Operator Certification rules outlined in Ohio Administrative Code (OAC) 3745-7 were issued on December 21, 2006. Staffing and certification levels outlined in the rules will become effective with any NPDES permit action, issued after December 2008. Record keeping requirements and responsibilities of a certified operator (OAC 3745-7-09) must be followed immediately.

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Documentation of all operation and maintenance activities on the collection system and wastewater treatment plant must be developed and maintained. The required documentation includes, but is not limited to: dates and times of arrival and departure for the operator of record and preventative maintenance logs for all plant and collection system components. The records must be kept up to date, contain a minimum of three months data at all times, and be maintained on site for at least three years.

If you have any questions, please call Tom Poffenbarger at (419) 373-3008.

Yours truly,



Allen L. Rupp, P.E.
District Engineer/Section Manager
Division of Surface Water

TP/llr

Enclosures

pc: Mr. Philip Epley, Village of Ada w/enclosures
◀DSW-NWDO File w/enclosures▶

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:

(a) Multiple nitrogen, ammonia; total suspended solids; and CBOD loading violations have been reported in the past year.

(b) No actions are being taken to resolve loading violations.

(c) Mercury variance application was received February 23, 2007.

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>5</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 ___ ON MORS ___ 800 NO.	___	___	<u>X</u>	___
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECTION	<u>X</u>	___	___	___

COMMENTS/STATUS:

- (b) telemetry
- (d) Plant is checked twice per day on weekends and holidays.
- (k) An overflow occurred at a manhole at the plant, due to a pump failure.

COLLECTION SYSTEM:

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

Section H: Sludge Management

(a) SLUDGE MANAGEMENT PLAN (SMP)
SUBMITTED DATE _____ APPROVAL # _____ NOT SUBMITTED _____ N/A X

	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>Craig Services</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:

(a) Sludge language was recently incorporated into NPDES permit, eliminating need for a Sludge Management Plan.
(g) Holding capacity at the WWTP is not adequate. It is occasionally necessary to haul to another facility (Lima WWTP)

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: ___ ULTRASONIC & PARSHALL FLUME <u>X</u> ULTRASONIC & WEIR ___ WEIR ___ CALCULATED FROM INFLUENT ___ OTHER (Specify _____)				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration <u>April 2006</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	<u>X</u>	___	___	___
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB				
Monthly parameters, sludge, metals				

(2) LAB NAME: Masi and Ginosko

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:

Section J: Effluent/Receiving Water Observations

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

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 DUST CLOUDS 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

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	--	
	Safety Features	S	FENCE SURROUNDING PLANT
	Bypasses	--	
	Stormwater Overflows	--	
	Alternate Power Source	S	GENERATOR
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	3 UNITS
	Ventilation	S	
	Bar Screen	--	
	Disposal of Screenings	--	
	Comminutor	IN	MUFFIN MONSTER
	Grit Chamber	IN	
	Disposal of Grit	S	LANDFILLED
Primary	Settling Tanks	IN	2 UNITS
	Scum Removal	IN	DEWATERED AND SENT TO LANDFILL
	Sludge Removal	IN	TO DIGESTER
	Effluent	S	GREY COLOR
Sludge Disposal	Digesters	IN	ANAEROBIC
	Temperature and pH	S	
	Gas Production	IN	USED IN BOILERS
	Heating Equipment	IN	
	Sludge Pumps	IN	SIX PUMPS
	Drying Beds	OUT	4 - NOT USED
	Vacuum Filter	--	
	Disposal of Sludge	S	LAND APPLICATION / HAUL TO ANOTHER POTW
Other	Sludge Storage Tank	IN	2/3 FULL
	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
Secondary-Tertiary List items as	Chemical Treatment	IN	POLYMER ADDITION
	Aeration Tanks	IN	2 UNITS -MEDIUM BROWN COLOR
	Clarifiers	IN	2 UNITS
	Nitrification Towers	IN	2 UNITS
Disinfection			
	Effluent	S	CLEAR
	Disinfection System	IN	CHLORINE GAS
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	IN	
Dechlorination	IN	SODIUM BISULFITE	