



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

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

November 4, 2010

Mayor and Council
Village of Dunkirk
201 North Main Street
Dunkirk, Ohio 45836

Dear Mayor and Council:

On October 26, 2010, a National Pollutant Discharge Elimination System (NPDES) Permit Compliance/Combined Sewer Overflow (CSO) inspection was conducted in the Village of Dunkirk. Mr. Paul Cramer was present and provided information on operation and maintenance of the wastewater treatment plant and collection system. The inspection included completion of the enclosed NPDES Compliance Inspection Report, observation of two CSO locations and inspection of the wastewater treatment plant. This letter and report cover the NPDES permit compliance and wastewater treatment plant portions of the inspection. A separate inspection report and letter, from Mr. Dan Gill of our Central Office, will follow addressing CSO compliance issues.

During our visit, there was no discharge from the lagoon system. The water in each of the three lagoon cells was light green in color. One wind powered aerator and one of two electric aerators were operating in the east cell. The wind powered aerator in the west cell was removed for service; the two electric aerators were in operation.

Your NPDES permit Schedule of Compliance required contracts to be awarded for Phase I sewer improvements by September 30, 2009, and construction to begin by October 31, 2009. Mr. Cramer indicated that bidding/construction did not start yet. This is a violation of your NPDES permit. Bidding is expected to begin in the second week of November 2010, with construction beginning shortly afterward. Please provide our office an updated bidding/construction schedule.

The Schedule of Compliance also required a mercury compliance letter or variance request to be submitted by October 1, 2009. Neither was received, Low level mercury effluent limitations became effective on November 1, 2010. Our review of your recent discharge monitoring reports indicates that the Village will not be able to meet the monthly average limits for mercury. We recommend that you apply for a variance as soon as possible.

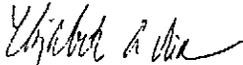
Our records indicate that no CSO monitoring reports have been submitted with your discharge monitoring reports (DMRs) since April 2009. Please begin submitting these reports on a monthly basis.

Mayor & Council
November 4, 2010
Page Two

During the inspection, Mr. Cramer stated that Mr. Steve Manns remains the operator of record for the wastewater treatment/collection system. Documentation of Mr. Mann's visits must be maintained and kept on site. These records must include the following at a minimum: identification of the sewerage system, or treatment works; dates and times of arrival and departure for the operator of record, specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage received and/or effluent produced; results of tests performed and samples taken, unless documented on a laboratory bench sheet; performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed, effluent produced; and identification of the persons making entries. 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.

Our completed inspection report is enclosed for your records. If you have any questions, please call Tom Poffenbarger at (419)373-3008.

Yours truly,



Elizabeth A. Wick, P.E.
Water Quality Engineer/Unit Supervisor
Division of Surface Water

TP/cs

Enclosure

pc: DSW-NWDO-File:w/enclosure

ec: Mr. Dan Gill, DSW, CO



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PB00061	OH0048321	10/26/2010	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Dunkirk Wastewater Treatment Plant North side of SR 81, East of US 68 Dunkirk, Hardin County	9:50 AM	March 1, 2008
	Exit Time	Permit Expiration Date
	11:45 AM	February 28, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Paul Cramer, Village Superintendent	419-759-2102	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council Village of Dunkirk 201 N. Main Street Dunkirk, Ohio 45836	419-759-2102	

Section C: Areas Evaluated During Inspection (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
M	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>There was no discharge from the lagoons during inspection.</p> <p>Schedule of Compliance required construction of Phase 1 of the sewer project to begin in October 2009. Construction has not started. However, bidding for new sanitary sewer system is expected to begin in the second week of November.</p> <p>Our records indicate that no request for a Mercury Variance was received. Mercury limit became effective on November 1, 2010.</p> <p>Operator of record hours must be documented and kept onsite.</p>	
Inspector	Reviewer
<p>Thomas Poffenbarger, P.E.</p> <p>Division of Surface Water</p> <p>Northwest District Office</p>	<p><i>Elizabeth A. Wick</i> 11/2/10</p> <p>Elizabeth A. Wick, P.E.</p> <p>Water Quality Engineer/Unit Supervisor</p> <p>Division of Surface Water</p>
Date	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) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... NA
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in NPDES Permit
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

(a) Total Suspended Solids and Fecal Coliform – June 2010
(e) Schedule of Compliance required Contract for Phase 1 sewers by September 30, 2009; Begin Construction for Phase 1 by October 31, 2009; Complete Construction Phase 1 by July 31, 2010.

Schedule also Required Mercury Variance Application or letter of compliance by October 1, 2009.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. N
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: I
- (f) Copy of certificate of Operator of Record displayed on-site..... N
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... NA
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... NA
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Hard Bound Book

- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) 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..... N
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification 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

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 100%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... N
- (e) CSOs monitored and reported in accordance with permit..... N
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding N
- (k) Are any portions of the sewer system at or near capacity..... Y

Comments/Status:

(e) CSO reports must be submitted for each month. No reports have been received since April 2009.
(g) Lift stations have visual alarms.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... NA
(c) Sludge adequately disposed..... NA
(Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... NA
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... N
(g) Adequate sludge storage provided at plant..... NE
(h) Land application sites monitored and inspected per SMP..... NA
(i) Records kept in accordance with State and Federal law..... NA
(j) Any complaints received in last year regarding sludge..... N
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify: Estimated)
- (b) Calibration frequency adequate NA
(Date of last calibration:)
(c) Secondary instruments operated and maintained..... NA
(d) Flow measurement equipment adequate to handle full range
of flows..... NA
(e) Actual flow discharged is measured..... NA
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (cont)

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 5 and 8)
- (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

Laboratory:

General

- (a) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite NA
- (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: SOP's are required per Standard Methods 1020A and states "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."

- (c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... NA
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... NE
- (h) Satisfactory calibration and maintenance of instruments/equipment. NE
(see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

- (j) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab: All except DO and pH

Lab name: Alloway

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	NO							

Comments/Status:

No discharge from lagoons during inspection.

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?

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	--	
	Potable Water Supply Protection	--	
	Safety Features	S	Fence surrounding WWTP
	Bypasses	--	
	Storm Water Overflows	--	
	Alternate Power Source	--	
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	S	
	Ventilation	S	
	Bar Screen	--	
	Disposal of Screenings	--	
	Comminutor	--	
	Grit Chamber	--	
	Disposal of Grit	--	
Primary	Settling Tanks	--	
	Scum Removal	--	
	Sludge Removal	--	
	Effluent	--	
Sludge Disposal	Digesters	--	
	Temperature and pH	--	
	Gas Production	--	
	Heating Equipment	--	
	Sludge Pumps	--	
	Drying Beds	--	
	Belt Filter Press	--	
	Centrifuge	--	
	Disposal of Sludge	--	
Other	Flow Meter and Recorder	--	
	Records	--	
	Lab Controls	--	
	Chemical Treatment	--	
Secondary - Tertiary	East Lagoon Cell	IN	1 wind powered aerator operating, 2 electric aerators, Light green color
	West Lagoon Cell	IN	1 wind powered aerator out for maintenance, 2 electric aerators, Light green color
	Final Lagoon Cell	IN	Un-aerated, Light Green color
Disinfection	Effluent	OUT	No discharge during inspection
	Disinfection System	--	
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
	Dechlorination	--	