



**Environmental
Protection Agency**

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

Re: Hardin County
Village of Forest
NPDES Permit

September 22, 2010

Mayor and Council
Village of Forest
211 W. Lima Street
P. O. Box 220
Forest, Ohio 45843

Dear Mayor and Council:

On September 14, 2010, a National Pollutant Discharge Elimination System (NPDES) Permit Compliance/Combined Sewer Overflow (CSO) inspection was conducted in the Village of Forest. Mr. Charles Brunkhart and Mr. Stephen Manns were 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 CSOs and 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, all treatment units were in service. The contents of the west (primary) lagoon were dark green/black in color with one wind driven aerator in service. The contents of the east (secondary) lagoon were dark green in color with two wind driven aerators in service. The final effluent discharge was green. However, no samples were taken to verify compliance with NPDES permit limits.

Our review of our Discharge Monitoring Report (DMR) records indicates that no DMRs have been submitted for CSO Stations 003, 004 and 005 since May 2009. Please inform this office of the status of these reports and resubmit them if they are available. No effluent violations have been reported in the past year.

As discussed during the inspection, your NPDES permit contains a Schedule of Compliance that requires CSOs to be eliminated by December 31, 2015. Mr. Brunkhart and Mr. Manns informed us that construction of the new separate sanitary sewer system is complete and that 91% of the homes have been tied into the system. The remaining homes have approximately 45 days to make connection. Closure of the CSOs will take place after all occupied homes have completed connection.

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Your Schedule of Compliance also required a Mercury Variance application or intent to comply letter to be submitted by January 1, 2010. Neither was received. Final Table mercury effluent limitations of 1.3 ng/l become effective on December 1, 2010. Our review of your DMR data shows very little potential that the Village will be able to meet the proposed mercury limits. A variance application should be submitted immediately in order to remain in compliance.

Record keeping and documentation at the facility need attention. A log book must be developed to keep an up to date record for wastewater system operations and maintenance, which contains at a minimum, the following information: identification of the sewerage system, or treatment works; date 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 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.

Our completed inspection checklist 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/lir

Enclosure

pc: Mr. Charles Brunhart, Village Administrator w/enclosure
DSW-NWDO.File w/enclosure

ec: Mr. Dan Gill, DSW, CO w/enclosure



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
2PB00044	OH0025151	9/14/2010	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Forest WWTP South side of CR 20 Forest, Hardin County	12:30 PM	July 1, 2008
	Exit Time 2:40 PM	Permit Expiration Date June 30, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Charles Brunkhart, Village Administrator Mr. Steve Manns, Operator	419-273-2500	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council Village of Forest 211 W. Lima St; P.O. Box 220 Forest, Ohio 45843	419-273-2500	

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	U	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)	
<p>Final effluent discharge was green in color.</p> <p>No effluent violations have been reported in the past year.</p> <p>No DMRs have been submitted for CSO Stations 003, 004 and 005 since May 2009.</p> <p>Collection system is complete with 91% of homes tied in.</p> <p>Mercury Variance application was due in January 2010. Mercury limits become effective on December 1, 2010.</p>	
Inspector	Reviewer
<p><i>Thomas Poffenbarger</i> 9/20/10</p> <p>Thomas Poffenbarger, P.E. Date Division of Surface Water Northwest District Office</p>	<p><i>Elizabeth A. Wick</i> 9/21/10</p> <p>Elizabeth A. Wick, P.E. Date Water Quality Engineer/Unit Supervisor Division of Surface Water</p>

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)..... N/A
- (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..... Y
- (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..... N/A
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

(a) No violations since last inspection.

(c) Eliminate all overflows by December 31, 2015.
Mercury variance letter/application was due Jan 1, 2010

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N/A
- (b) Adequate alarm system available for power or equipment failures.. N/A
- (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..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (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..... N/A
 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..... N
- (b) Format of log book (i.e. computer log, hard bound book)
- (c) Log book(s) kept onsite (in an area protected from weather)..... N
- (d) Log book contains the following:
 - I. Identification of treatment works..... N
 - 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)..... N
 - IV. Laboratory results (unless documented on bench sheets)... N
 - V. Identification of person making log entries..... N
- (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..... N/A

Section G: Operation & Maintenance (cont)

Collection System:

- (a) Percent combined system: 9%
- (b) Any collection system overflows since last inspection..... N
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... Y
- (e) CSOs monitored and reported in accordance with permit..... N
- (f) Portable pumps used to relieve system..... Y
- (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..... N

Comments/Status:

- (e) No CSO Station (003, 004 & 005) DMRs have been received since May 2009.
- (f) Twice in past 6 years due to power outages.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A

- (b) Sludge management plan current..... N/A
- (c) Sludge adequately disposed..... N/A
(Method:)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... N/A
(Name:)
- (f) Has amount of sludge generated changed significantly since
last inspection..... N/A
- (g) Adequate sludge storage provided at plant..... N/A
- (h) Land application sites monitored and inspected per SMP..... N/A
- (i) Records kept in accordance with State and Federal law..... N/A
- (j) Any complaints received in last year regarding sludge..... N/A
- (k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

(b) The facility uses bioaugmentation in an effort to control sludge levels in each lagoon cell.

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: Ultrasonic)

- (b) Calibration frequency adequate Y
(Date of last calibration: 12/1/2009)
- (c) Secondary instruments operated and maintained..... N/A
- (d) Flow measurement equipment adequate to handle full range
of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (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 N/E
- (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..... N/A
- (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

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. Y
(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 pH, BOD, Temperature and dissolved oxygen.

Lab name: Ginosko

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No	none	none	Slight	None	None	green	

Comments/Status:

002, 004 and 005 – No discharge

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 wastewater treatment plant
	Bypasses	--	
	Storm Water Overflows	--	
	Alternate Power Source	--	
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	S	
	Ventilation	--	
	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	S	
	Records	--	
	Lab Controls	--	
	Chemical Treatment	--	
Secondary - Tertiary	West Lagoon Cell (Primary)	IN	Dark green/black color, one wind driven aerator
	East Lagoon Cell (Secondary)	IN	Dark green color, two wind driven aerators
Disinfection	Effluent	M	Dark green in color
	Disinfection System	IN	Tablet chlorinator
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	--	
	Dechlorination	IN	Tablet dechlorinator