



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Bowling Green, OH 43402-9398

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

Re: Henry County  
City of Napoleon  
NPDES Permit

June 5, 2009

Mayor and Council  
City of Napoleon  
255 West Riverview Avenue  
Napoleon, Ohio 43545

Dear Mayor and Council:

On March 25, 2009, Dana Martin-Hayden and Dan Gill inspected the Napoleon Wastewater Treatment Plant. Mr. Roger Noblit and Mr. Matthew Bilow were present and provided operation and maintenance information. The inspection included a tour of the facility and completion of the enclosed inspection form.

During our visit, all major treatment units except for chlorination, due to winter season, were in operation and the effluent being discharged to the Maumee River was visually clear. Since our last inspection on May 6, 2008, there have not been any significant permit exceedences.

All the staff at this facility hold a Class III operator license, which indicates a commitment on the City's part to encourage and support building a staff that can support the facility's Class III operator requirement. The City should review the new operator rules at OAC 3745-7-09 (Recordkeeping requirements and responsibilities of a certified operator). A method needs to be developed to more completely comply with the rules regarding record keeping requirements. The City does a good job of keeping detailed records, however, a review of these rules may slightly alter the overall procedure.

Per the Director's Final Findings and Orders issued to the City on July 25, 2000, a Combined Sewer Overflow Long Term Control Plan (CSO LTCP) was submitted on December 31, 2003. The schedule contained in the CSO LTCP was approved by Ohio EPA and was first included in the 2PD00000\*OD permit. After consultation with the City Engineer, Mr. Chad Lulfs, and Mr. Noblit, we have updated the schedule of compliance in the NPDES permit to reflect the work that has been completed and the remaining projects under the CSO LTCP. The CSO LTCP projects are ahead of schedule.

Mayor and Council  
June 5, 2009  
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We greatly appreciate the prompt and careful attention that was given to assisting us in updating this section of the permit.

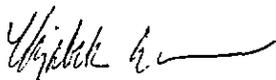
The City of Napoleon is constructing a 2.5 million gallon per day equalization basin (EQ) as part of the CSO LTCP. This facility will have a new ultraviolet (UV) disinfection system and construction is scheduled to be completed in November of 2010.

Alum is used to treat phosphorous, a parameter that is modeled during the permit renewal process to ensure that discharge levels are not impacting waters of the state. The cost of Alum has doubled in the last year. We are concerned that one of your industrial dischargers does not treat their waste stream for phosphorous and has the potential to discharge large amounts of phosphorous to the POTW. We will be discussing this issue with the industry, since they have an Indirect Discharge Permit (IDP) with our office. However, we recommend that you also work with the industry to strongly encourage them to reduce your risk of higher phosphorous levels and treatment costs.

We have discussed your comments regarding the draft NPDES permit and a response to comment letter will be issued with the final NPDES permit.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please call Dana Martin-Hayden at (419) 373-3067.

Yours truly,



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

/llr

Enclosure

pc: ~~DSW-NWDO~~ File w/all enclosures

ec: Dana Martin-Hayden, DSW-NWDO  
Dan Gill, DSW, CO

# NPDES COMPLIANCE INSPECTION REPORT

## Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
<u>2PD00000</u>	<u>OH020893</u>	<u>09/3/25</u>	<u>S</u>	<u>S</u>	<u>1</u>

## Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Napoleon WWTP 735 East Washington Street Napoleon, Ohio 43545 Henry County	3:00 PM	February 1, 2008
	Exit Time	Permit Expiration Date
	5:00 PM	July 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mr. Roger Noblit, Director of Water and Wastewater Mr. Matt Bilow, Assistant Superintendent Mr. Chad <u>Lufts</u> , City Engineer	419-592-3936

Name, Address and Title of Responsible Official	Phone Number
Mr. Roger Noblit, Director of Water and Wastewater City of Napoleon 255 W. Riverview Avenue, P.O. Box 151 Napoleon, Ohio 43545	419-592-3936

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Dana Martin-Hayden

Dana Martin-Hayden, Ohio EPA, Northwest  
 Name(s) and Signature(s) of Inspector(s) Date District Office

Elizabeth A. Wick

Elizabeth A. Wick, P.E., Ohio EPA, Northwest  
 Name and Signature of Reviewer Date District Office

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:

f) EQ basin under construction

**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:



**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
<b>GENERAL</b>				
(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 <u>Metals/Oil and Grease, sludge, TKN, total P</u>				

(2) LAB NAME: 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 : <u>08/29/08</u> <u>X</u> 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	None	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 DUSTCLOUDS 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

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	Construction on EQ basin, busy site work and silt fencing in place
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	Fence/Dike surrounding plant
	Bypasses	OUT	Plant Bypass
	Stormwater Overflows		
	Alternate Power Source	S	Generator (runs 1/week) on a timer - new generator for EQ basin coming
Preliminary	Maintenance of Collection System	S	Construction of EQ basin to reduce CSO occurrences - EPA SSO complaint - received two in last year. One outstanding.
	Pump Station	IN	3 influent pumps
	Ventilation	IN	
	Bar Screen	IN	2 mechanical in parallel
	Disposal of Screenings	S	Landfill - Henry County Landfill
	Comminutor		
	Grit Chamber	IN	2 de-gritting channels (1/2 hour/day)
Disposal of Grit	S	Landfill - Henry County Landfill	
Primary	Settling Tanks	IN	2 units - grey green - slight growth on weirs
	Scum Removal	IN	
	Sludge Removal	IN	to digester
	Effluent	S	
Sludge Disposal	Digesters	IN	2 anaerobic, 1 sludge storage tank
	Temperature and pH	S	
	Gas Production	S	Used to heat sludge in summer - natural gas needed to heat in winter
	Heating Equipment	IN	
	Sludge Pumps	IN	5 pumps from clarifier to digester (2 primary, 3 final)
	Drying Beds	IN	2 drying beds, and 1 vac truck bed
	Vacuum Filter	-	
	Disposal of Sludge	S	Sludge press (2000) (press 2-3 days/week) and storage building are in, land apply in July/August (press water goes to head of plant) dry in building
Sludge Storage	IN	Old digester holds 40 days or more + sludge building	
Other	Flow Meter and Recorder	IN	Influent - calibrated 3/17/09
	Records	S	
	Lab Controls	S	
	Chemical Treatment	IN	Alum for phosphorous removal (added prior to final clarifier) Trihydrate used - not the lower grade boxide
Secondary-Tertiary List items as	Bio-Towers	IN	2 units
	Aeration Channels	IN	2 units - greyish /with some foam
	Final Settling Tanks	IN	3 units - algae on weirs
	Re-circulation Pumps	IN	4 units, 2 high flow and 2 low flow
	Final Effluent Pumps	OUT	used only during high river levels
Disinfection	Effluent	S	Clear, odorless
	Disinfection System	IN	Projected to be replaced with Ultraviolet (UV) in December of 2010
	Effective Dosage	-	
	Contact Time	-	
	Contact Tank	IN	Serpentine Chamber
Dechlorination	OUT	Operated 5/1-10/31	