



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Huron County
City of Norwalk WWTP
NPDES Permit

October 15, 2008

Mr. Dale Shepphard, Safety Service Director
City of Norwalk
P.O. Box 30
Norwalk, OH 44857

Dear Mr. Shepphard:

On October 7, 2008, Andrew Gall conducted an NPDES permit compliance inspection of the wastewater treatment facilities serving the City of Norwalk. Mr. Nick Butler, Mr. David Ackerman and Mr. Tim Cox were present and provided information on plant operations and maintenance. The inspection included a tour of the facility and completion of the enclosed compliance inspection form. At the time of the visit, the plant appeared to be operating correctly and a clear final effluent was being discharged to Rattlesnake Creek. Samples were taken for use in screening bioassays as part of a toxics evaluation in conjunction with the WWTP's NPDES permit renewal in 2010. The results of the bioassay will be forwarded to Mr. Butler under separate cover.

All of the construction associated with the plant upgrades has been completed. As a result of the construction the raw plant bypass (Station 008) has been eliminated, leaving the post primary bypass (Station 009) as the only bypass remaining at the WWTP. Since our last inspection permanent stand by generators have been installed on two of the sanitary sewer lift stations and additional portable generators have been purchased for use at other lift stations. The flow study and engineering work is underway for the elimination of the CSO overflows at the South Pleasant St. Lift Station. It was indicated that overall the amount of CSO activity has gone down so far this year. Also, it was noted that less sewage sludge is being generated as a result of the new fine screen being installed at the head works.

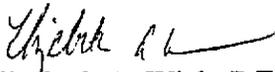
Discharge Monitoring reports are being submitted in a timely manner. A review of discharge monitoring reports since our last inspection indicates that there were effluent limit violations of Mercury in March and May 2008. A copy of these violations is enclosed for your review. We realize that the City is working to implement the mercury pollutant minimization program however; we are very concerned that there have been multiple violations of your variance based mercury limit in the past year. We have reviewed the data that was submitted with the Mercury PMP Annual Report. It shows that the septic haulers and several areas in the sewer system are the largest sources of mercury for the WWTP. We recommend that the septage receiving

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program be evaluated to determine if there is a way to reduce the amount of mercury being received from septic haulers. The city should also move forward with trying to eliminate sources of mercury in areas of the sewer system where mercury contamination was identified.

Our completed inspection report is enclosed for your review. If you have any questions, please feel free to contact Mr. Andrew Gall at (419) 373-3003 or via email at andrew.gall@epa.state.oh.us

Yours truly,



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

/lb

Enclosure

pc: Mr. Nick Butler, Superintendent, w/enclosure
Mr. Josh Snyder, City Engineer
~~INWDO-DSW file w/enclosure~~

Detail - Limit Violations

Permit: 2PD00024

Period: 3/1/2008 8/31/2008

Permit No	Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PD00024*PD	Norwalk WWTP	May 2008	001	00530	Total Suspended Sol 30D Conc	20	26.9677	26.9677	5/1/2008
2PD00024*PD	Norwalk WWTP	May 2008	001	00530	Total Suspended Sol 30D Qty	265	276.731	276.731	5/1/2008
2PD00024*PD	Norwalk WWTP	May 2008	001	00530	Total Suspended Sol 7D Conc	30	31.5714	31.5714	5/8/2008
2PD00024*PD	Norwalk WWTP	Mar 2008	001	50092	Mercury, Total (Low 130D Qty	0.0000	.00029	.00029	3/1/2008
2PD00024*PD	Norwalk WWTP	Mar 2008	001	50092	Mercury, Total (Low 130D Conc	6.8	11.	11.	3/1/2008
2PD00024*PD	Norwalk WWTP	May 2008	001	50092	Mercury, Total (Low 130D Conc	6.8	9.3	9.3	5/1/2008

F. GUIDELINE - 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	
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Bypasses	Out	
	Stormwater Overflows	Out	
	Alternate Power Source	S	Generator
	EQ Basin	Out	Expanded to 4 MG, ramp for clean out equipment installed
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	In	11 Pump Stations, Back up power be added to larger lift stations
	Ventilation	S	
	Bar Screen	In	Andritz Aqua Screen Bar Screen
	Disposal of Screenings / Grit	S	Hauled by WWTP in a trailer to Erie County Landfill
	Grit Chamber	In	Air Cyclone Degritter System, 2 Air Compressors, 2 Grit Pumps
	Septage Receiving Station	In	2 Holding Tanks, 2 Vaughn Chopper Pumps, Sampling Station
	Ferric Feed System	In	
Primary	Settling Tanks	In	2 New Primary Clarifiers
	Scum Removal	In	
	Sludge Removal	In	
	Effluent	S	
	Scum Pumping Station	In	
	Post Primary Splitter Box	Out	Directs flow to trickling filters or bypass when flows exceed 8MGD
Sludge Disposal	Digesters	In	3 Anaerobic
	Temperature and pH	S	
	Gas Production	S	Used in summer to run heat exchanger, wasted in winter
	Heating Equipment	In	Heat Exchanger
	Sludge Pumps	In	2 Raw, 2 Transfer, Digester Mix Pumps
	Sludge Gravity Thickener	In	No Scum Floating on Top
	Sludge Holding Tank	In	Provides an estimated 1.5 years of storage
	Disposal of Sludge	S	Land Application by Mapleview Farms
Other	Flow Meter and Recorder	In	Flow meter is calibrated against V-Notch Weir
	Records	S	
	Lab Controls	S	
	Chemical Treatment	Out	
Secondary-Tertiary List items as required	Primary Trickling Filters	In	3 Domed, 1 Uncovered
	Secondary Trickling Filter	In	
	Nitrification Tower	In	
	Final Clarifiers	In	5 - Concrete rehabbed
	Rapid Sand Filters	In	6 Filters, 1 down for service
	Sand Filter Screw Pumps	In	Alternate pumps each week
Disinfection	Effluent	S	Clean, Very Slight Foam, No Odor
	Disinfection System	In	
	Effective Dosage	-	
	Contact Time	-	
	Contact Tank	S	
	Dechlorination	In	

Permit #: 2PD00024
 NPDES #: OH0052604



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
2PD00024	OH0052604	10/7/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Norwalk WWTP 201 Plank Rd. Norwalk, OH 44857	12:30 PM	4/1/2006
	Exit Time	Permit Expiration Date
	2:45 PM	7/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Nick Butler, WWTP Superintendent	(419) 663-6755	
David Ackerman, Asst. WWTP Superintendent	(419) 663-6755	
Richard Moore, Sewer System Superintendent	(419) 663-6715	
Name, Address and Title of Responsible Official	Phone Number	
Dale Sheppard, Safety Service Director City of Norwalk P.O. Box 30 Norwalk, OH 44857		

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

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

Inspector	Reviewer
<i>Andrew Y. Gall</i> 10/14/08	<i>Elizabeth A. Wick</i> 10/14/08
Andrew Y. Gall Environmental Specialist Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Water Quality Engineer Division of Surface Water Northwest District Office

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)..... Y
- (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:

New Flow Diversion Chamber, Larger EQ Basin, New Headworks, New Grit Removal, Two New Clarifiers and New Sludge Holding Tank now online
During construction Outfall 008 - Raw Bypass was eliminated, a letter verifying this was submitted

Section F: Compliance Schedules/Violations

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

Comments/Status:

TSS Violations occurred when primary tank was down for construction and trickling filters were sloughing. City is still working on following compliance schedule and implementing the required PMP to meet Mercury limit.

Plant construction and Woodlawn Ave. CSO separation was completed as required by compliance schedule.

Flow study on Pleasant Street is underway.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

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

Record Keeping:

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

2 hard bound log books being maintained, one for operator of record and one for Operation and Maintenance Activities
- (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..... Y
 - 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: 30%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (d) CSO O&M plan provided and implemented..... Y
- (e) CSOs monitored and reported in accordance with permit..... Y
- (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 Y
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

Treatment Works:
(h) – Computer system produces monthly work orders for maintenance activities
(i) - Recent problems with heat exchanger on digester which have been repaired as needed
(j) - O&M Manual being updated by Arcadis, includes video directions of equipment start up

Collection System:
CSO Activity has been low this year, approximately 2-3 overflows
2 of the lift stations no have permanent stand by generators installed
2 portable generators have been purchased to serve other lift stations
1 portable generator purchased to serve only the Pleasant St. lift station

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: 2/5/1986 Approval #: 03-233 Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method:Land Application by Mapleview Farms)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name:Mapleview Farms)
- (f) Has amount of sludge generated changed significantly since last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... Y

- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

-Amount of sludge being generated appears to be less since the new screening system was put online
- Anaerobic digestion – Maintain records of time and temperature, Sludge is direct injected for VAR
- Estimate that new sludge holding tank has approximately 1.5 years of storage

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:)
- (b) Calibration frequency adequate Y
(Date of last calibration:)
- (c) Secondary instruments operated and maintained..... Y
- (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:

Effluent flow meter is checked for accuracy each month against V-Notch weir.

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
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis
conform with 40 CFR 136.3..... Y
- (e) 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
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab: Mercury, Metals, Organics, Oil and Grease, Sludge Dioxin, Toxicity

Lab name: Jones and Henry, Wright State, New England Bioassy

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: 9/2008

Comments/Status:

(g) pH and D.O. meter calibrated daily, Balances calibrated annually
 (I) Passed DMRQA

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	Slight	None	Clear	

Comments/Status:

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: