



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: Marion County  
Marion WWTP  
NPDES Permit

August 18, 2009

Jay M. Shoup, Service Director  
City of Marion  
223 West Center Street  
Marion, Ohio 43302

Dear Mr. Shoup:

On July 30, 2009, Mr. Jason Ko conducted a Compliance Inspection of your wastewater treatment plant. Mr. Roger Baldinger, Assistant Superintendent, was present and provided information regarding the operation of the facility.

At the time of the inspection, all major treatment components were in service. The final discharge from the treatment plant was clear. However, we did not collect effluent samples to determine the quality of the discharge during the visit.

Your current NPDES permit will expire on July 31, 2012. Please note that this NPDES permit (Part I, Item C) requires the City to comply with five (5) implementation schedules with specific milestones as follows:

- (1) Municipal Construction Schedule – requiring compliance with final effluent limits by August 2010
- (2) Municipal CSO Schedule – requiring completion of sewer collection improvements by June 2020
- (3) Mercury Schedule – requiring submittal of necessary documentation by April 2011
- (4) Pollutant Minimization Program (PMP) for Mercury – Requiring submittal of control strategies by April 2011
- (5) Municipal Pretreatment Schedule – Requiring submittal of technical justification of local industrial user limits to Ohio EPA, Central Office Pretreatment Unit by February 2008

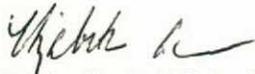
We understand that the city was experimenting with post aeration during river flooding conditions to alleviate the dissolved oxygen violations. Also, a portable standby generator is now available as another backup power source. Our review of your Discharge Monitoring Reports (7/1/2008 to 8/1/2009) indicated some effluent violations. Please refer to the enclosed violation table.

Mr. Jay M. Shoup  
August 18, 2009  
Page 2

The U.S. EPA DMR-QA Study #28 indicated that all test parameters were rated acceptable except for mercury and nitrite. We encourage your continued participation in the QA Program to assure the accuracy and reliability of your monthly monitoring data.

Our completed inspection report is enclosed with this letter. If you have any questions, please call Mr. Jason Ko of our office at 419-373-3021.

Yours truly,



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

/csl

pc: Mark Feldman, Marion WPC  
DSW, NWDO File

# NPDES COMPLIANCE INSPECTION REPORT

## Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
2PD00011	OH0026352	2009/7/30	C	S	P

## Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Marion WWTP 1810 Marion-Agosta Road Marion, OH 43302	10:00 A.M.	8/1/2007
	Exit Time 11:30 A.M.	Permit Expiration Date 7/31/2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mr. Roger Baldinger, Assistant Superintendent	(740) 383-6051

Name, Address and Title of Responsible Official	Phone Number
Mr. Jay Shoup, Service Director City of Marion 233 West Center Street Marion, OH 43302	(740) 382-0649

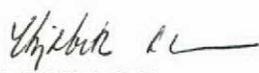
## Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>--</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>S</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluents	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>-</u> Other

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

- \* Current NPDES permit will expire on 7/31/2012
- \* The Schedule of Compliance in the NPDES permit contained 5 items with specific time frames
  - 1)Municipal Construction Schedule - comply with final effluent limits by 8/2010
  - 2)Municipal CSO Schedule – complete sewer collection improvements by 6/2020
  - 3)Mercury Schedule – Submit necessary documentation by 4/2011
  - 4)Pollutant Minimization Program (PMP) for Mercury – submit control strategies by 4/2011
  - 5) Municipal Pretreatment Schedule - evaluate the local industrial user limitations by 2/2008
- \* A portable standby generator as a backup power source is now available
- \*City is experimenting with post aeration in the event of river flooding
- \* Review of your Discharge Monitoring Reports (7/1/2008 to 8/1/2009) indicated some effluent violations

 Jason Ko Name(s) and Signature(s) of Inspector(s)	8/17/09 Date	Ohio EPA, Northwest District Office
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 Elizabeth A. Wick, P.E. Name and Signature of Reviewer	8/14/09 Date	Ohio EPA, Northwest District Office
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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 - Part I.C</u>	<u>X</u>	___	___	
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE	<u>X</u>	___	___	

COMMENTS/STATUS:

(d) The Schedule of Compliance in the NPDES permit contained 5 items with specific time frames

- 1)Municipal Construction Schedule - comply with final effluent limits by 8/2010
- 2)Municipal CSO Schedule - complete sewer collection improvements by 6/2020
- 3)Mercury Schedule - Submit necessary documentation by 4/2011
- 4)Pollutant Minimization Program (PMP) for Mercury - submit control strategies by 4/2011
- 5) Municipal Pretreatment Schedule - evaluate the local industrial user limitations by 2/2008

**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>	<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>2</u> DAYS/WEEK <u>7</u>	<u>X</u>	___	___	
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS REQUIRED BY PERMIT CLASS: <u>IV</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>	___	

**COLLECTION SYSTEM:**

	Yes	No	N/A	N/E
(a) PERCENT COMBINED SYSTEM <u>50%</u>				
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSO <u>X</u> 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:**

Treatment Works:

- (a) A portable standby generator is now available
- (d) Two 12 hour shifts

**Section H: Sludge Management**

(a) SLUDGE MANAGEMENT PLAN (SMP)  
SUBMITTED DATE \_\_\_\_\_ APPROVAL # \_\_\_\_\_ NOT SUBMITTED \_\_\_\_\_ N/A

	Yes	No	N/A	N/E
(b) SLUDGE MANAGEMENT PLAN CURRENT	___	___	___	<u>X</u>
(c) SLUDGE ADEQUATELY DISPOSED (METHOD: ___)	___	___	___	<u>X</u>
(d) IF SLUDGE IS INCINERATED, WHERE IS ASH DISPOSED OF _____	___	___	___	___
(e) IS SLUDGE DISPOSAL CONTRACTED (NAME: ___)	___	___	___	<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:

**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: ___ PARSHALL FLUME ___ ULTRASONIC & WEIR ___ WEIR ___ CALCULATED FROM INFLUENT <u>X</u> OTHER (Specify <u>magnate-influent / effluent</u> )				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration <u>5/08</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
<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>Alloway - TTO, Arsenic, cyanide, TKN, priority pollutants &amp; Selenium</u> <u>Ginosko - Sludge &amp; Low Level mercury</u>				
(2) LAB NAME:				
<b>QUALITY CONTROL/QUALITY ASSURANCE</b>				
(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>2008</u> <u>X</u> SATISFACTORY    ___ MARGINAL    ___ UNSATISFACTORY				

COMMENTS/STATUS:

DMR-QA study #28 indicated all test parameters were rated acceptable except mercury & nitrite

**Section J: Effluent/Receiving Water Observations**

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
001	--	--	--	--	--	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	
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Bypasses (settled)	OUT	28 mgd and above the plant will bypass at Outfall 603
	Stormwater Overflows	OUT	
	Alternate Power Source	S	A portable standby generator is available as backup to dual feed system
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	3 screw pumps and 1 running
	Ventilation	-	
	Bar Screen	IN	2 units (1/4 inch)
	Disposal of Screenings	S	Landfill
	Comminutor	-	
	Grit Chamber	-	
	Disposal of Grit	-	
	Grease Separator	IN	1 unit
Primary	Settling Tanks	IN	4 tanks; 2 in use
	Scum Removal	IN	
	Sludge Removal	IN	
	Effluent	S	
Sludge Disposal	Digesters	OUT	Use for sludge holding tanks
	Temperature and pH	-	
	Gas Production	-	
	Heating Equipment	-	
	Sludge Pumps	IN	3 RAS, 3 WAS, 4 thickeners & 4 Raw
	Sludge holding Tank	IN	2 tanks & aerated tank in use (prior to the press)
	Sludge Thickener	IN	2 units
	Disposal of Sludge	M	Land application, routine odor complaints
	Sludge Press	OUT	2 units
Sludge Storage	IN		
Other	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	OUT	
Secondary-Tertiary <small>List items as</small>	Oxidation Ditch	IN	All 4 in use
	Secondary Settling	IN	All 4 in use
	Tertiary Settling	IN	All 4 in use
	Blower	IN	3 units; 2 running
Disinfection	Effluent	S	Clear
	Disinfection System	IN	
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	IN	4 units; all in use
	Dechlorination	IN	
	Post Air	OUT	Experimenting during river flooding events

Get New Data

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PD00011*MD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.6351	9/1/2008
2PD00011*MD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	8.59143	9/1/2008
2PD00011*MD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	40	83.1568	9/1/2008
2PD00011*MD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Qty	60	165.932	9/1/2008
2PD00011*MD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	6.58571	9/8/2008
2PD00011*MD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Qty	60	182.147	9/8/2008
2PD00011*MD	October 2008	001	50092	Mercury, Total (Low Le	30D Conc	12	17.9333	10/1/2008
2PD00011*MD	November 2008	001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.0	4.13286	11/8/2008
2PD00011*MD	February 2009	001	00300	Dissolved Oxygen	1D Conc	5.0	.89	2/11/2009
2PD00011*MD	February 2009	001	00300	Dissolved Oxygen	1D Conc	5.0	.9	2/12/2009
2PD00011*MD	February 2009	001	00300	Dissolved Oxygen	1D Conc	5.0	2.11	2/13/2009
2PD00011*MD	February 2009	001	00300	Dissolved Oxygen	1D Conc	5.0	4.68	2/14/2009
2PD00011*MD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	.224	5/8/2009