

**Environmental
Protection Agency**

Governor
Lt. Governor
Director

October 11, 2011

RE: ASHTABULA COUNTY
GENEVA CITY WWTP
OHIO EPA PERMIT 3PD00014
COMPLIANCE INSPECTION EVALUATION

Mr. Gary Hydinger, Superintendent
City of Geneva Wastewater Department
44 North Avenue West
Geneva, OH 44041

Dear Mr. Hydinger:

On October 5, 2011, a site inspection was conducted at the above referenced facility at 44 North Avenue West, City of Geneva, Ashtabula County. The inspection was conducted by John Schmidt of this office. Greg Copeland and Beverly Hoffman represented the City of Geneva on the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and in conjunction with the renewal of said permit. A reconnaissance inspection was also conducted of the City's industrial wastewater treatment program. The last compliance inspection was conducted on August 10, 2010.

The system consists of grit removal, raw sewage pump station, primary settling (clarifiers), rock trickling filters with recirculating pumps, final settling (clarifiers), nitrification towers with recirculation, rapid sand filtration, chlorine disinfection, and sulfur dioxide dechlorination. Alum is fed for phosphate control. Chlorine is added to the waste stream prior to rapid sand filtration to discourage biological growth in the rapid sand filters, and the chlorine contact tank is located following rapid sand filtration. Sludge management consists of primary and secondary settling tanks, primary digestion and secondary digestion in series, and dewatering with a belt filter press. Dried sludge is stored in an old sludge drying bed and sold as a Class A sludge. As a backup, sludge drying beds are available as an alternate to the belt filter press. The facility discharges to Cowles Creek adjacent to the west side of the facility. Generators provide backup power to the entire facility.

Observations and Notations

Following are observations and notations made during the inspection.

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Grit is containerized for disposal at a solid waste landfill.

2. Alum is fed to aid in phosphorus control. When switching alum suppliers, operational problems developed and the City returned to the original alum supplier.
3. The operation of the rock tricking filters was satisfactory. They are cleaned weekly. Primary and secondary clarifier effluent troughs were reasonably clean and there was no scum around the effluent baffle or the trough. Weirs and troughs are cleaned weekly.
4. The effluent discharged from the sand filters during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
5. Chemicals were noted in the chlorination and sulfur dioxide feed systems. A new cover was installed over the east tank to retard algal growth. The chlorine contact tank was operating as designed.
6. Composite samples are collected with a flow proportional sampler, which are maintained at the proper temperature.
7. The final effluent was clear and was mixing well with the receiving stream. The discharge was clearer than the receiving water upstream of the discharge.
8. The new laboratory was in use.

NPDES Permit Compliance Review

A review of the electronic Discharge self-Monitoring Reports (eDMRs) received by Ohio EPA for the period July 1, 2010, through September 1, 2011, indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

<u>Station</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
001	00530	Total Suspended Solids	7D Qty	227	280.817	2/22/2011

The City of Geneva provided an explanation and measures to assure that they will not be repeated in a response dated March 7, 2011. No additional response is need to this exceedence event at this time.

Reporting and Compliance Schedule Violations

No reporting or compliance schedule violations were noted for the period reviewed.

Sanitary Sewer Overflow (SSO) Reporting

The 2010 SSO report was received on February 28, 2011. No SSOs were reported for 2010. In 2011, Weather-related SSOs were reported on February 28, 2011, April 23, 2011, April 25, 2011, June 7, 2011, August 15, 2011, and August 25, 2011.

Industrial Pretreatment Program

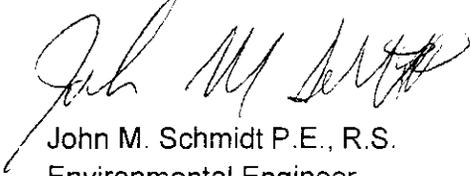
A limited scope pretreatment program inspection was conducted by completing the reconnaissance inspection checklist. Geneva has prepared revisions to its Significant Industrial User (SIU) ordinance per Ohio EPA comments from the 2010 audit as outlined in the October 27, 2010, letter. Geneva expects to submit the SIU ordinance revisions and other program revisions to Ohio EPA by December 31, 2011. The SIU list is limited only to Nordic Air. Geneva has inspected its SIU in 2010. No septage is accepted. Geneva has had no interference from its IUs. The SIU has not been timely in data submission, and Geneva has notified the entity in NOVs.

Austin Road Sewers

As you are aware, we have been discussing the status of the northern end of the Austin Road sanitary sewers north of Austin Mobile Estates that were installed 1991-1992. These sewers were apparently not installed with an approved Permit-To-Install (PTI). As indicated in my letter to Gary and Grace Wimbs of which you were copied, Ohio EPA will expect an as-built PTI application that will incorporate raising all manholes to proper grade.

If you have any questions or comments regarding this notification, please feel free to contact me at (330)963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

ec: Donna Kniss, DSW NEDO

File: Municipal/Geneva City WWTP (Ashtabula Co.)/PC