



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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www.epa.state.oh.us

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

August 13, 2010

Re: Tuscarawas County
City of New Philadelphia WWTP
Compliance Evaluation Inspection
Correspondence (PWW)

Mayor and Council
City of New Philadelphia
150 East High Avenue
New Philadelphia, Ohio 44663

Dear Mayor and Council:

On March 24, 2010, I conducted a compliance evaluation inspection at the New Philadelphia Wastewater Treatment Plant. The purpose of the inspection was to determine compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number 0PD00012*OD and to evaluate wastewater treatment plant performance. The wastewater treatment plant was found to be in compliance with the permit. Mr. Aaron Hixenbaugh and Mr. Mike Scolati were present during the evaluation.

The final effluent discharging to the Tuscarawas River was visually clear. No effluent samples were collected. At the time of my inspection, all treatment units, except for the Muffin Monster, one (1) raw sewage pump and UV disinfection, were in operation. As a result of the inspection, I have the following comments.

1. At the time of my inspection, the back-up raw sewage pump was out of service due to a bad seal. I understand the grit removal equipment is located after the raw sewage pumps. As grit passes through these pumps, it causes excess wear and tear on the pump seals. I understand the city has to rebuild each raw sewage pump at least once if not more per year at a cost of approximately \$10,000 each time. I recommend the city evaluate their options in this area to determine if there is a more cost effective solution to handle this problem.
2. As stated in previous inspection letters, I remain concerned that there are no stairs or landing available for employees to access the grease removal equipment. Employees have to use the traveling scraper to complete daily operation and maintenance activities on this equipment. This is a safety issue that needs to be addressed by the city. I understand the city has budgeted funds for a roof and stairs to address the safety issue. Please inform this office of the schedule to complete the work.

At the time of the inspection, the Mixed Liquor Suspended Solids (MLSS) was being maintained at 2500 mg/l. The MLSS is usually maintained between 1800 and 2000 mg/l. The city needed to remove sludge from the system, but was unable since the polymer pump was out of service. The new pump was scheduled to arrive on March 25, 2010. When the pump arrived, the sludge press was to be put back into service and the sludge was to be sent to the landfill for disposal.

3. At the time of my inspection, there were no thermometers in the influent and effluent composite samplers. A thermometer must be purchased and maintained in each of the composite samplers. CBOD₅, ammonia and nitrate + nitrite were reported as unacceptable in DMR-QA Study 28. CBOD₅ was reported as unacceptable in DMR-QA Study 29. The city took corrective actions for CBOD₅ and has satisfied the Department of Environmental Services.
4. Flow meters must be calibrated annually by a certified technician.
5. At the time of my inspection, there was sludge in the old chlorine contact tanks. As discussed during the inspection these tanks need to be cleaned out.
6. Mr. Seibold's January 9, 2006 letter states that the four (4) septic systems in Section 23 and twenty-three (23) septic systems in Section 26 were not a priority in 2005. However, the City Service Director was going to work with the City Law Director and formulate a plan of action for the first quarter of 2006. In a letter dated October 17, 2008, I was informed that the Service Director, Jim Zucal, will address this issue. To date no additional information has been provided to this office regarding these septic systems. Please inform this office what steps have been taken by the city or the city's plan of action (e.g. Pumping tanks, etc.).
7. I was informed in September 2004 and January 2006 that the city was going to begin enforcing their sewer use ordinance to check for foundation drains connected to the sanitary sewer system in the Schoenbrunn Estates area. In addition, a letter dated October 17, 2008 stated "Our new Service Director and Law Director are looking into this matter to find out legal precedence of City Employee's entering private homes to check foundation drains." Has the city ever followed through with their inflow/infiltration work in this area? To date no addition information has been provided on this subject.
8. In a letter dated September 13, 2001, I informed the city that they had not constructed a roof over the concrete containment pad at the city's general service garage located at 1234 Commercial Avenue, S.E. as required by the November 10, 1999 Permit to Install (PTI) approval. My letter, requested the city submit a schedule of compliance indicating when the roof would be installed and the bypass sewer and valve would be eliminated. On June 25, 2001, I received a letter from Civil Design Associates, Inc. recommending the city work with Ohio EPA to resolve the outstanding issue. A review of your file reveals there is no closure on this issue.

Mr. Seibold's January 9, 2006 letter stated the drain on the containment pad would be cemented shut, and that photo documentation would be provided when the project was completed. To date no photos have been submitted. Lastly, the Service Director's letter dated October 21, 2008 stated "This information is new to me and I

will act upon this by contracting with Civil Design Associates, Harry Matter, to evaluate and determine how we can alleviate this problem." To date I have not received any additional information. Please inform this office on the status of this project.

9. Please inform this office how the restaurant grease trap inspection program has been going? How many sewer users have been connected to the sewer line along Stone Creek Road? How many sewer users still need to be connected to the sewer line along Stone Creek Road?
10. Your NPDES permit was renewed and became effective on July 1, 2010. Your new permit includes E. coliform and mercury monitoring until October 31, 2010. Beginning November 1, 2010, fecal monitoring will be eliminated and a limit will become effective for mercury. In addition, a lower limit for copper will begin July 1, 2013. A Schedule of Compliance is included for meeting the copper limit along with pretreatment program requirements. Lastly, the city should be receiving a newly printed copy of the permit to fix the printing errors in the document.
11. The average annual residential sewer rate in the state of Ohio for 2008 was \$489. A review of your average annual residential sewer rate for 2008 reveals the city charged \$319. This is a substantial difference in rates, which does not allow the city to adequately budget for improvements in the wastewater treatment plant (e.g. grit improvements, pump replacement, etc.) or sewer improvements (inflow/infiltration reduction, sewer repair, etc.) that are currently needed or will be needed in the future. I strongly encourage the city to reevaluate their sewer rates. For additional comparisons, please see the 2008 Sewer and Water Rate Survey at the following link: http://www.epa.state.oh.us/ofa/rate_survey.html.

A copy of our completed inspection report is enclosed. Please submit a written response to the aforementioned comments within **30 days** of receipt of this letter. The assistance and cooperation received during the inspection are appreciated. If you have any questions regarding this letter, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte
Chemical Engineer - Environmental Specialist II
Division of Surface Water

JMW/dh

Enclosure

c: Aaron Hixenbaugh, Superintendent, New Philadelphia WWTP
c: Keith Eames, New Philadelphia Health Department

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00012*DD	OH0026727	March 24, 2010	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
New Philadelphia WWTP 1422 Delaware Drive New Philadelphia, Ohio 44663	10:00 a.m.	July 1, 2008
	Exit Time	Permit Expiration Date
	12:45 p.m.	January 31, 2010

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Aaron Hixenbaugh, Superintendent Mike Scolati, Assistant Superintendent	(330) 339-3573
Name, Address, & Title of Responsible Official	Phone Number
Mayor and Council 150 East High Avenue New Philadelphia, Ohio 44663	(330) 364-4491

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>U</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>N/A</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> </u> Other
<u>S</u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.

Jennifer M. Witte
Jennifer M. Witte, Inspector, Ohio EPA, Southeast District Office

8/17/10
Date

Timothy M. Campbell
Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

8/10/10
Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Correct name & location of receiving waters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Product(s) & production rates conform with permit application (industries)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Flows & loadings conform with NPDES permit	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Treatment processes are as described in permit application/briefing memo	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. New treatment process(es) added since last inspection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Notification given to state of new, different, or increased discharges	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. All discharges are permitted	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Number & location of discharge points are as described in permit	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

F. COMPLIANCE SCHEDULES/VIOLATIONS

	YES	NO	N/A	N/E
a. Any significant violations since the last inspection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Permittee is taking actions to resolve violations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Permittee has compliance schedule	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Compliance schedule contained in:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Permittee is meeting compliance schedule	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: <input checked="" type="checkbox"/> Dual Feed: <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Adequate alarm system available for power or equipment failures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. All treatment units in service other than backup units	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Sufficient operating staff provided: # of shifts: 3 Days/Week: 7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Operator holds unexpired license of class required by permit. Class: III	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Copy of certificate of Operator of Record displayed on-site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Minimum operator staffing requirements fulfilled (OAC 3745-7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Routine & preventive maintenance schedule/performed on time	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Any major equipment breakdown since last inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Operation & maintenance manual provided & maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Any plant bypasses since last inspection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l. Regulatory agency notified of bypasses: On MORS: <input type="checkbox"/> 800 No.: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
m. Any hydraulic and/or organic overloads experienced since last inspection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. Turned on every Tuesday, but is not loaded.
- c. & g. Muffin Monster has been removed and now city uses coarse bar screen. Spare raw sewage pump was out for repairs. New sludge polymer pump on order and should arrive soon.
- d. There are 7 operators (4-Class III; 2-Class II; 1-Class I)
- j. Updates to the manual have been made. Document will be formally approved.

Record Keeping	YES	NO	N/A	N/E
a. Log book provided	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Log book kept on-site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Log book contains the following:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1. Identification of treatment works	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Date/time of arrival/departure of ORC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Daily record of operation and maintenance activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Laboratory results (unless documented on bench sheets)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Identification of person making log entries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Is the ORC submitting written notification to Ohio EPA and permittee when a collection system overflow, treatment plant bypass or effluent limit violation has occurred.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Collection System	YES	NO	N/A	N/E
a. Percent combined system. Percent: 0	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Any collection system overflows since last inspection: CSO: <input type="checkbox"/> SSO: <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Regulatory agency notified of overflow (SSOs)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. CSO O&M plan provided and implemented	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. CSOs monitored and reported in accordance with permit	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Portable pumps used to relieve system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Lift station alarm systems provided and maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Are lift stations equipped with permanent standby power or equivalent	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Any complaints received since last inspection of basement flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Are any portions of the sewer system at or near capacity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- b. & h. Approximately 5000 gallons of sewage from manhole behind AEP because it collapsed.
- h. Portable pumps have bypass pump connection or run pumps with portable generator during emergencies.
- j. Three basement back ups
- k. East High Avenue at capacity. Upgrading sewer lines and pump station.

H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: Landfilled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If sludge is incinerated, where is ash disposed of?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Is sludge disposal contracted? Name:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Has amount of sludge generated changed significantly since last inspection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Adequate sludge storage provided at facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Land application sites monitored and inspected per state rules	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Records kept in accordance with state rules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Any complaints received in last year regarding sludge	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Is sludge adequately processed (digestion, dewatering, pathogen control) in accordance with Ohio EPA rules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E
a. Quality assurance manual provided and maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Satisfactory calibration and maintenance of instruments and equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Adequate records maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: DMR-QA Study 28 / 29 <input type="checkbox"/> Satisfactory <input type="checkbox"/> Marginal <input checked="" type="checkbox"/> Unsatisfactory				

Comments:

- d. CBOD₅, ammonia and nitrate and nitrite were reported as not acceptable in Study 28. CBOD₅ was reported as not acceptable in Study 29.

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	Clear	

Comments:

K. MULTIMEDIA OBSERVATIONS

Collection System	YES	NO	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Do you notice staining or discoloration of soils, pavement, or floors	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Do you notice distressed (unhealthy, discolored, dead) vegetation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Do you see unidentified dark smoke or dustclouds coming from sources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Do you notice any unusual odors or strong chemical smells	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
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:

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

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 Prot.	S	City
	Safety Features	S	
	Bypasses	--	
	Stormwater Overflows	--	
	Alternate Power Source	OUT	Generator; turned on every Tuesday, but not loaded
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	IN	19 units; rags are problem at pump stations
	Ventilation	S	
	Coarse Screen/Fine Screen	IN	2 units; one coarse unit and one fine unit
	Disposal of Screenings	S	Landfilled - Kimble
	Comminutor	OUT	Has been removed; but city has grit & grease removal & fine screens
	Grit Chamber	IN	1 unit; aerated
	Disposal of Grit/Grease	S	Landfilled; collected in wheel barrels
	Raw Sewage Pumps	IN	4 units (2200 gpm); variable speed; 1 unit back-up
	Grease Removal	IN	1 unit; aerated
Primary	Settling Tanks	IN	3 units; 2 off-line because of low flow; rotated 2/year
	Scum Removal	S	To digester
	Sludge Removal	S	To digesters
	Effluent	S	Gray
	Sludge Pumps	OUT	2 units
Sludge Disposal	Digesters	IN	3 aerobic units operated in series
	Sludge Pumps	IN	
	Waste Tank	IN	1 unit
	Sludge Press	OUT	1 unit; run 1 week and then off for 3 to 4 weeks
	Disposal of Sludge	S	Landfilled
	Polymer Pump	OUT	1 unit; on order and should arrive shortly
	Septage Receiving	IN	Receive 1-2 trucks per week; grease traps hauled to Canton
Other	Flow Meter and Recorder	U	Flow meters must be calibrated annually
	Records	S	
	Lab Controls	S	
	Chemical Treatment	S	
Secondary Tertiary (list items as required)	Aeration Tanks	IN	4 units; (3 units in service); fine air; one used for sludge
	Secondary Clarifiers	IN	3 units; weirs cleaned 1/month
	Blowers	IN	7 units; 4 for aeration and 3 for digesters
	Return Activated Sludge Pumps	IN	3 units
	Waste Activated Sludge Pumps	IN	2 units
	Decant Pump	IN	1 unit
	Drain Pump	IN	1 unit; can also be used as RAS pump
Disinfection	Effluent	S	Visually clear
	UV Disinfection	OUT	Disinfection required May 1 to October 31
	Effective Dosage	--	
	Contact Time	--	
	Contact Tank	--	
Dechlorination	--		