



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

October 16, 2008

Re: Jefferson County
City of Toronto
NPDES 0PD00017*HD
Compliance Inspection
Correspondence (PWW)

Mayor and Council
City of Toronto
308 North Sixth Street
Toronto, Ohio 43964

Mayor and Council:

On October 2, 2008 Ohio EPA conducted an inspection of the City of Toronto's wastewater treatment plant. Terry Coburn was present at that time and accompanied me through the plant. The inspection's purpose was to evaluate the City of Toronto's compliance with NPDES permit No. 0PD00017*HD and ORC Chapter 6111. Based on the inspection and a review of records, the following violation was noted:

1. The city of Toronto has failed to meet the requirements of NPDES permit 0PD00017*HD, Part I, C, A. "Within 24 months of the effective date of this permit modification, or by March 1, 2006, the permittee shall develop and submit for approval the of the Southeast District Office two copies of a combined Sewer System Long Term Control Plan."

The City of Toronto must continue to work with USEPA to complete and submit the required LTCP. Please provide a report detailing when the LTCP will be completed and submitted to USEPA for final review.

The City of Toronto must also address the following issues:

1. The secondary clarifier sludge pump worm drive was inoperable at the time of the inspection. Mr. Coburn stated that this equipment had been down for approximately five weeks, and that replacement parts were to be delivered around October 10. Please ensure that all damaged and inoperable equipment is repaired or replaced as soon as possible.

Plant personnel should evaluate the condition of all essential equipment on a regular basis and plan repairs or replacement prior to actual failure when possible.

2. Mr. Coburn stated that the City of Toronto would likely be losing access to agricultural fields currently utilized for sludge land application. It is imperative that alternative disposal methods be identified prior to this happening. The City of Toronto is required to maintain a 180-day sludge storage capacity at the treatment plant. Under current land-application disposal practices, the City is not meeting this requirement. If application fields are lost, this situation could be exacerbated.

At this time, the City of Toronto is required to develop an alternate disposal and storage method. It is recommended that design work be initiated on sludge drying beds, belt filter press system, or equivalent sludge treatment and storage alternative.

3. It was noted during the inspection that outfall 001 is not identified by the required sign. The city of Toronto must identify all outfalls, including CSO outfalls, with an appropriate sign meeting the following specifications (this language will appear in Part II of Toronto's renewal permit):

Not later than 4 months from the effective date of this permit, the permittee shall post a permanent marker on the stream bank at each outfall that is regulated under this NPDES permit where a marker does not currently exist. This includes final outfalls, bypasses, and combined sewer overflows. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible. If the outfall is normally submerged the sign shall indicate that. If the outfall is a combined sewer outfall, the sign shall indicate that untreated human sewage may be discharged from the outfall during wet weather and that harmful bacteria may be present in the water. When an existing marker is replaced or reset, the new marker shall comply with the requirements of this section.

5. During previous inspections, it was noted that the joints between the trickling filter tower sections were leaking. During the October 2 inspection, it was noted that these joints are still leaking, though not severely. The City of Toronto needs to continually evaluate the need for complete replacement of these joint seals.

Please ensure that the above items are addressed as soon as possible in order to help maintain continued compliance with applicable limits. Please provide this office with updates on your progress.

If you have any questions, feel free to contact me at (740) 380-5447.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Yandrich', written over a horizontal line.

Michael Yandrich, P.E.
District Representative
Division of Surface Water

MY/dh

Enclosure

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPD00017HD	OH0020214	October 2, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Toronto Wastewater Treatment Plant 1400 South River Avenue Toronto, Ohio 43964	10:15 a.m.	March 1, 2004
	Exit Time	Permit Expiration Date
	11:30 a.m.	July 31, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Terry Coburn, Regional Manager, EarthTech	(740) 537-3743
Name, Address and Title of Responsible Official	Phone Number
Mayor and Council City of Toronto 308 North Sixth Street Toronto, Ohio 43964	(740) 537-2591

C. AREAS EVALUATED DURING INSPECTION

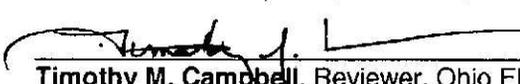
<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>U</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>M</u> Sludge Storage/Disposal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

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

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

See attached inspection letter.
Combined collection system


Mike Yandrich, Inspector, Ohio EPA, Southeast District Office


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

10-27-08
Date

10/27/08
Date