Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Crawford County
City of Bucyrus
NPDES Permit

December 6, 2011

Mayor and Council
City of Bucyrus
500 South Sandusky Avenue
Bucyrus, Ohio 44820

Dear Mayor and Council:

On November 22, 2011, an inspection was conducted at the City of Bucyrus Waste Water Treatment Plant. The inspection included a tour of the facility and completion of a checklist designed to evaluate the major areas of the treatment plant. Mr. Terry Spiegel, Superintendent, provided information to Ohio EPA representatives, Ms. Michelle Sharp and Mr. Andy Gall. Our inspection findings and recommendations are summarized below.

At the time of the inspection, all major treatment units were in operation. The flow entering the plant was light in color. The mixed liquor in the aeration tanks had a healthy brown color, though there was one tank that was dark in color and seemed to have an odor. Scum was observed on the clarifiers. The effluent appeared clear.

A review of your discharge monitoring reports from January 2011 through October 2011 shows violations of the terms and conditions of your permit. The specific instances of noncompliance are attached.

Please note that your facility is currently on our Significant Non-Compliance (SNC) list. This is due to exceedance of the mercury limit. Please submit to us in writing within 30 days of receipt of this letter what actions you intend to take to meet this limit.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please call Michelle Sharp at (419) 373-3019.

Yours truly,

Elizabeth A Wick, P.E.
Environmental Engineer/Section Manager
Division of Surface Water

MS/jlm
Enclosures
pc: Terry Spiegel , Superintendent, City of Bucyrus WWTP
Inspection Tracking File

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PD00021*KD	February 2011	001	00530	Total Suspended Solids	30D Conc	12	21.85	2/1/2011
2PD00021*KD	February 2011	001	00530	Total Suspended Solids	30D Qty	154	281.264	2/1/2011
2PD00021*KD	February 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.0	10.1	2/1/2011
2PD00021*KD	February 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.00022	2/1/2011
2PD00021*KD	February 2011	001	00530	Total Suspended Solids	7D Conc	18	20.2666	2/8/2011
2PD00021*KD	February 2011	001	00530	Total Suspended Solids	7D Conc	18	39.7	2/15/2011
2PD00021*KD	February 2011	001	00530	Total Suspended Solids	7D Qty	232	765.763	2/15/2011
2PD00021*KD	March 2011	001	00530	Total Suspended Solids	30D Conc	12	15.7083	3/1/2011
2PD00021*KD	March 2011	001	00530	Total Suspended Solids	7D Conc	18	20.2	3/1/2011
2PD00021*KD	March 2011	001	00530	Total Suspended Solids	30D Qty	154	275.709	3/1/2011
2PD00021*KD	March 2011	001	00530	Total Suspended Solids	7D Qty	232	388.653	3/1/2011
2PD00021*KD	March 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.0	11.1	3/1/2011
2PD00021*KD	March 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.00019	3/1/2011
2PD00021*KD	March 2011	001	00530	Total Suspended Solids	7D Conc	18	20.5	3/8/2011
2PD00021*KD	March 2011	001	00530	Total Suspended Solids	7D Qty	232	413.613	3/8/2011
2PD00021*KD	April 2011	001	00530	Total Suspended Solids	30D Qty	154	163.489	4/1/2011
2PD00021*KD	April 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.0	14.9	4/1/2011
2PD00021*KD	April 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.00034	4/1/2011
2PD00021*KD	June 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.0	8.3	6/1/2011
2PD00021*KD	June 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.89	6/5/2011
2PD00021*KD	June 2011	001	00610	Nitrogen, Ammonia (NH3	7D Conc	3.0	4.52	6/15/2011
2PD00021*KD	July 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.0	28.7	7/1/2011
2PD00021*KD	July 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.00015	7/1/2011
2PD00021*KD	July 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.9	7/19/2011
2PD00021*KD	August 2011	001	50092	Mercury, Total (Low Le	30D Conc	7.0	9.7	8/1/2011
2PD00021*KD	October 2011	001	31648	E. coli	7D Conc	362	1027.57	10/15/2011

Permit # : OH0052922529522
NPDES #: 2PD00021

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
OH0052922	2PD00021	11/22/2011	S	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Bucyrus 1500 West Southern Avenue Bucyrus, OH 44820	10:45 AM	3/1/2010
	Exit Time	**Permit Expiration Date**
	11:45 AM	9/30/2014

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Mr. Terry Spiegel, Supterintendent	419-562-8981

Name, Address and Title of Responsible Official	Phone Number
Mayor and Council City of Bucyrus 500 S Sandusky Ave. Bucyrus, Ohio 44820	419-562-6767

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	S	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

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

Inspector	Reviewer
	Thomas Poffenbarger 11/29/11
Michelle Sharp Date Environmental Specialist II Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E. Date Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office

Permit # : OH0052922529522
NPDES #: 2PD00021

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).....	N/A
(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.....	N/A
(h) All discharges are permitted.....	Y
(i) Number and location of discharge points are as described in permit.....	Y

Comments/Status:

Section F: Compliance Schedules/Violations

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

Comments/Status:

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..... Class: III	Y
(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.....	N
(l)	Regulatory agency notified of bypasses..... On MORs ☐ and/or Spill Hotline (1-800-282-9378) ☐	N/A
(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)	
	Hard bound notebooks and time sheets	
(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: 75%
(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..... N
(i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N
(j) Any complaints received since last inspection of basement flooding Y
(k) Are any portions of the sewer system at or near capacity..... N/E

Comments/Status:

Section H: Sludge Management

(a) Sludge management plan (SMP)
Submitted date: 3/20/2004 Approval #: Not submitted ☐ N/A ☐

(b) Sludge management plan current..... Y
(c) Sludge adequately disposed..... Y
(Method:Land Apply)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... N
(Name:)
(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..... N/A
(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:

The plant processes sludge 3.5 - 4 days per week.

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:

(b) calibration scheduled for December

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. N
(d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
(e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals and Bioassay

Lab name: Alloway

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: 2011

Comments/Status:

Permit # : OH0052922529522
NPDES #: 2PD00021

Section J: Effluent/Receiving Water Observations

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