



**Environmental
Protection Agency**

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

Re: Seneca County
Fostoria WWTP
NPDES Permit

November 23, 2011

Mayor & Council
City of Fostoria
213 South Main Street
Fostoria, Ohio 44830

Dear Mayor & Council:

On October 20, 2011, Mary Beth Cohen conducted a compliance inspection of the Fostoria Wastewater Treatment Plant (WWTP). Mr. Lon (Mickey) Shank, Superintendent, was present and provided information regarding plant operations. All major treatment units were in service during the inspection. The following items were noted:

- Weirs have been fabricated and attached to the Thomas Street combined sewer overflow (CSO) structure. It was indicated that since this addition, the onset of discharge from the CSO events is postponed and volume of overflow is noticeably reduced. The operating height of the weir may be adjusted to minimize the CSO discharge.
- The digester liner improvement project was completed one year ago. The liner was installed to stop leaking due to breaches in the tank walls.
- The dried solids from the sludge press continue to be disposed of at the landfill.
- Standard Operating Procedures (SOP's) are required for all analysis performed in the lab as required per Standard Methods 1020A which states "*Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results.*" Please see page 6 of the attached inspection report for additional information regarding SOP's.

Staffing Requirements:

In accordance with Ohio Administrative Code (OAC) 3745-7, the classification and staffing requirements of the Fostoria WWTP are specified in Part II of Fostoria's NPDES permit 2PD00031*OD (copy enclosed).

Mayor and Council
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The Fostoria WWTP is classified as a Class IV facility, and requires a Class IV certified operator. Under OAC 3745-7-02(E), an operator with a valid Class III certificate may be the operator of record of a Class IV treatment works for a period no longer than two years provided the class III operator is approved to take the Class IV test. Mr. Shank, WWTP Superintendent, has applied for and is currently working towards his Class IV operator's license. Staffing requirements of a Class IV facility require the following as indicated in OAC 3745-7-4:

The operator of record shall be physically present at the treatment works 5 days a week for a minimum of 40 hours per week.

The operator of record for a class II, III, or IV treatment works or class II sewerage system may be replaced by a backup operator with a certificate one classification lower than the treatment works or sewerage system for a period of up to thirty consecutive days.

OAC 3745-7 can be found at the following website: <http://www.epa.ohio.gov/ddagw/rules.aspx#ch7>.

Please inform this office in writing by December 31, 2011, of the staffing capability and/or plan to meet the above requirements, to include a backup operator with a Class III certificate.

A review of your discharge monitoring reports (DMRs) has been conducted. A list of permit violations (12/01/2010 through 10/30/2011) is enclosed.

Our completed inspection report forms are enclosed for your review. If there are any questions, please call Mary Beth Cohen at 419-373-3014.

Yours truly,



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

MBC/jlm

Enclosures

pc: Lon M. Shank, Superintendent
Stephen M. Jann, U.S. EPA, Region V
NWDO file



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
2PD00031	OH0052744	2011/10/20	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Fostoria Wastewater Treatment Plant 1301 Perrysburg Road Fostoria, Ohio 44830-1007	9:30 a.m.	May 1, 2010
	Exit Time	Permit Expiration Date
	1:30 p.m.	April 30, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Lon M. Shank, Superintendent	419-435-3263	
Name, Address and Title of Responsible Official	Phone Number	
Mayor & Council 213 S. Main Street Fostoria, Ohio 44830	419-435-4132	

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	N	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)	
<ul style="list-style-type: none"> It was indicated that the digester liner improvement project appears to have secured the breaches in the tank. The dried solids from the sludge press continue to be disposed of at the landfill. The WWTP staff operates 2 shifts/day, 1 shift/weekend day and storm event coverage as needed. The City continues to accept limited amounts of septage at the WWTP. 	
Inspector	Reviewer
 Mary Beth Cohen Division of Surface Water Northwest District Office	 Thomas Poffenberger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
Date 11/18/11	Date 11/22/11

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)..... Y
- (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:

WWTP design flow @ 8.25 MGD, treats flows up to 12 MGD during rain events.
Average dry weather flows 2.7 – 2.8 MGD, with overall average of 4.0 MGD last year.

Section F: Compliance

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

Comments/Status:

Both the NPDES Permit and Consent Decree include compliance Schedules.

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)..... I
- (e) Operator of Record holds unexpired license of class required by permit - Required Class: IV..... N
- (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..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Computer log and book
- (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: ~ 65 %
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (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..... Y
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding Y
- (k) Are any portions of the sewer system at or near capacity..... Y

Comments/Status:

Cleaning of the large sewer lines (60" & 72") has been completed.

The WWTP staff now operates 2 shifts/day, 1 shift/weekend day and storm event coverage as needed.

One of the three trickling filter pumps has been repaired, and a second pump is down / out for repair.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Approved: Yes Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method: Landfill)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... N
- (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:

*Poet is reclaiming/recycling more water, resulting in less discharge to the WWTP.
Filter press sludge is collected in dump truck(s), and when full hauled to the landfill for disposal.
Sludge volume is reported to be stable at this time.*

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 N/E
(Date of last calibration: *Not provided*)
- (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:

The required flow proportioned composite sampling is in use.

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
(see GLC page 5 and 8)
- (d) 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

Laboratory:

General

- (a) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite? N
- (b) Do SOP's include the following if applicable:
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: SOP's are required per Standard Methods 1020A and states "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results."

- (c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/E
- (e) Analyses being performed more frequently than required by permit. N/E
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/E

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. N/E
(see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
Date: Study #31- 2011

- (j) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab:
Toxicity, priority pollutants and sludge analysis

Lab name: *Alloway*

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001		None	None	None	None	None	None	

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:

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	-	
	Storm water Overflows	Out	
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	S	Class II Collection / sewerage system (OAC 3745-7-04)
	Pump Station	In	
	Ventilation	S	
	Bar Screen	In	Automatic bar screen with manual back up
	Disposal of Screenings	S	Landfill
	Comminutor	-	
	Grit Chamber	In	Manual or automatic (run manually while accepting POTW sludge)
	Degritter	In	
	Disposal of Grit	S	Landfill
	Equalization Lagoon	In	Lined E.Q. basin – Full at the time of inspection
Primary	Settling Tanks	In	Three operating (each taken down and cleaned yearly)
	Scum Removal	In	
	Sludge Removal	In	
	Effluent	S	
	Screw Pumps	In	One of two operating (rotated weekly)
Sludge Disposal	Digesters	In	Digester liner removed and replaced fall of 2010
	Temperature and pH	-	
	Gas Production	-	
	Heating Equipment	-	
	Sludge Pumps	In	Two sludge pumps / one operating
	Sludge Storage	In	No liquid storage available. Building provided for storage after belt press.
	Disposal of Sludge	S	Landfill (contractor is Midwest Compost)
	Belt press with Polymer addition	Out	Not in use at time of inspection – Typically run 1 days per week (16 hr/day) Sludge is can be collected directly in the dump truck used to haul to landfill
Other	Flow Meter and Recorder	In	New flow meter (permit requires flow proportioned samples)
	Records	S	
	Lab Controls	S	
	Chemical Treatment	In	Alum added to return sludge wet well for phosphorus control Alum pump recently replaced
Secondary Tertiary	Trickling Filters (arms removed)	In	Two - both in use as roughing filters (not able to bypass units)
	Aeration Tanks	In	Four tanks – all in use
	Final Settling Tanks	In	Six shallow tanks, all in use. Spray on liner added 4/08 for the control of algae. Algae growth on the weirs continues to be a problem.
Disinfection	Effluent	S	Appeared clear at discharge. (Slight foam- quickly dissipated)
	Disinfection System	In	Ultraviolet disinfection
	Effective Dosage	-	
	Contact Time	-	
	Contact Tank	-	

Part II, Other Requirements

A. Operator Certification Requirements

1. Classification

a. In accordance with Ohio Administrative Code 3745-7-04, the sewage treatment facility at this facility shall be classified as a Class IV facility.

b. All sewerage (collection) systems that are tributary to this treatment works are Class II sewerage systems in accordance with paragraph (B)(1)(a) of rule 3745-7-04 of the Ohio Administrative Code.

2. Operator of Record

a. The permittee shall designate one or more operator of record to oversee the technical operation of the treatment works and sewerage (collection) system in accordance with paragraph (A)(2) of rule 3745-7-02 of the Ohio Administrative Code.

b. Each operator of record shall have a valid certification of a class equal to or greater than the classification of the treatment works as defined in Part II, Item A.1 of this NPDES permit.

c. Within three days of a change in an operator of record, the permittee shall notify the Director of the Ohio EPA of any such change on a form acceptable to Ohio EPA. The appropriate form can be found at the following website:

http://www.epa.ohio.gov/portals/28/Documents/opcert/Operator_of_Record_Notification

d. Within 60 days of the effective date of this permit, the permittee shall notify the Director of Ohio EPA of the operators of record on a form acceptable to Ohio EPA.

e. The operator of record for a class II, III, or IV treatment works or class II sewerage system may be replaced by a backup operator with a certificate one classification lower than the treatment works or sewerage system for a period of up to thirty consecutive days. The use of this provision does not require notification to the agency.

f. Upon proper justification, such as military leave or long term illness, the director may authorize the replacement of the operator of record for a class II, III, or IV treatment works or class II sewerage system by a backup operator with a certificate one classification lower than the facility for a period of greater than thirty consecutive days. Such requests shall be made in writing to the appropriate district office.

3. Minimum Staffing Requirements

- a. The permittee shall ensure that the treatment works operator of record is physically present at the facility in accordance with the minimum staffing requirements per paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code or the requirements from an approved 3745-7-04(C) minimum staffing hour reduction plan. The permittee shall meet the minimum staffing requirements within 12 months of the effective date of this permit.
- b. Sewerage (collection) system Operators of Record are not required to meet minimum staffing requirements in paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code.
- c. If Ohio EPA approves a reduction in minimum staffing requirements based upon a facility operating plan, any change in the criteria under which the operating plan was approved (such as enforcement status, history of noncompliance, or provisions included in the plan) will require that the treatment works immediately return to the minimum staffing requirements included in paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code.

B. Description of the location of the required sampling stations are as follows:

- Sampling Station	Description of Location
- 2PD00031001	Final effluent (Lat: 41N 10' 12"; Long: 83W 25' 48")
- 2PD00031004	Combined Sewer Overflow. See Part II, Item D.
- 2PD00031005	Combined Sewer Overflow. See Part II, Item D.
- 2PD00031006	Combined Sewer Overflow. See Part II, Item D.
- 2PD00031008	Combined Sewer Overflow. See Part II, Item D.
- 2PD00031009	Secondary treatment bypass from equalization basin
- 2PD00031300	System Wide Sanitary Sewer Overflow Occurences
- 2PD00031586	Sludge to landfill
- 2PD00031601	Raw influent
- 2PD00031801	Upstream
- 2PD00031901	Downstream

C. All parameters, except flow, need not be monitored on days when the plant is not normally staffed (Saturdays, Sundays, and Holidays). On those days, report "AN" on the monthly report form.