



**Environmental
Protection Agency**

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

March 2, 2012

RE: ASHTABULA CITY WPCF
ASHTABULA CITY, ASHTABULA COUNTY
OHIO EPA PERMIT 3PE00002
COMPLIANCE EVALUATION INSPECTION

James Timonere, City Manager
City of Ashtabula
4717 Main Avenue
Ashtabula, Ohio 44004

Dear Mr. Timonere:

On February 29, 2012, a site inspection was conducted at the above referenced facility at 303 Woodland Avenue, City of Ashtabula, Ashtabula County. The inspection was conducted by John Schmidt of Ohio EPA. Mr. Michael Mearini, Superintendent, represented the City of Ashtabula during 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 as a pre-permit inspection in conjunction with renewal of your NPDES permit. The last compliance inspection was conducted on September 15, 2011.

Observations

Following are observations made during the inspection:

1. The overall condition of the treatment plant during this inspection was satisfactory, although some maintenance activities needs addressed as noted below.
2. Screenings and grit was containerized for disposal at a solid waste landfill. The air manifold for the grit chamber was noted as leaking. Mr. Mearini was aware of the leak, and stated that this would be repaired as soon as weather permits.
3. New influent and effluent flow proportional samplers are noted as installed and are collecting samples on a flow-proportional basis. Samples are maintained at the proper holding temperature.
4. One primary clarifier was out of service for maintenance, with one unit in service. The primary clarifier was observed with good settling with effluent weirs in acceptable condition, with the exception of one area that had a significant accumulation of grease and scum. Mr. Mearini indicated that the grease is removed as soon as practicable. One clarifier was out of service due to a broken valve stem.
5. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming. Blowers supplying air were noted in operating condition.

6. The surface of the clarifier was clear, with some pin floc noted. The effluent trough was clean and there was no scum around the effluent baffle or the trough. Effluent channels and weirs were clean.
7. The chlorine contact tank was out of service. The tank was empty and sludge was noted in the tank. Mr. Mearini stated that this tank will be cleaned before it is placed back into service in April 2012.
8. Prior to January 20, 2012, the WPCF laboratory performs monitoring of BOD, suspended solids, pH, DO, volatile organic compounds (VOCs), chlorine, and nitrate-nitrite, ammonia nitrogen. Ashtabula contracts with Cardinal Laboratories of Youngstown for metals, oil and grease, bacteria (E. Coli), toxicity testing, volatile organic compounds and semi-volatile organic compounds, and quality assurance samples from the WPCF laboratory. After January 20, 2012, Ashtabula contracts all laboratory services to Cardinal Laboratories except for onsite monitoring of pH, DO, and settle ability until a laboratory technician is hired.
9. Additional staff will be hired in 2012 to include an assistant superintendent/industrial pretreatment coordinator, chemist, laboratory analyst, and operator.
10. The final effluent at the outlet to Lake Erie could not be observed due to flow to a diffuser in Lake Erie. The final outfall at Station 001 was observed as the final effluent sampling chamber downstream of the clarifiers, and was of acceptable visual quality.
11. Documents inspected during the site visit include a portion of the spill control and countermeasure plan (SPCC) that addresses storm water that contains some elements of a storm water pollution prevention plan (SWPPP), and appears to have been updated

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period August 1, 2011 through February 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Conc	30	30.58	10/15/2011
001	00530	Total Suspended Solids	30D Conc	20	24.99	10/1/2011

Ashtabula submitted a letter of explanation and corrective action on November 2, 2011. No additional response is needed at this time.

Reporting Violations

The following reporting violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids			AB	9/22/2011
001	00530	Total Suspended Solids			AB	1/20/2012
601	00530	Total Suspended Solids			AB	1/20/2012
001	50092	Mercury, Total (Low Level)			AB	1/27/2012
001	50092	Mercury, Total (Low Level)			AB	1/27/2012
001	50092	Mercury, Total (Low Level)			AB	1/27/2012
001	50092	Mercury, Total (Low Level)			AB	1/27/2012
601	50092	Mercury, Total (Low Level)			AB	1/27/2012

Ashtabula submitted a letter of explanation and corrective action on November 2, 2011 for the September 2011 reporting violation, and an explanation provided for the January 2012 violations during the site visit. Low-level mercury was collected the first week of February 2012, and will be reported on the eDMR. No additional response is needed at this time.

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	61425	Acute Toxicity, Ceriodaphnia	1/Quarter	1	0	08/01/2011
001	61426	Chronic Toxicity, Ceridaphnia	1/Quarter	1	0	08/01/2011
001	61427	Acute Toxicity, Pimephales	1/Quarter	1	0	08/01/2011
001	61428	Chronic Toxicity, Pimephales	1/Quarter	1	0	08/01/2011
001	00665	Phosphorus, Total (P)	2/Week	2	1	11/15/2011

Ashtabula submitted a letter of explanation and corrective action on November 2-3, 2011 for the August 2011 reporting violations, and an explanation provided for the November 2011 violations during the site visit. The July 2011 whole effluent toxicity data will be submitted as a part of the July eDMR amended submittal. No additional response is needed at this time.

Compliance Schedule

Regarding the compliance schedule, Ohio EPA notes the following:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
4/1/2007	7/31/2011	4/1/2010	4/01/2010	91299	Other	Submit Corrective Action Plan
4/1/2007	7/31/2011	8/1/2010	9/10/2010	3099	Construction	Begin Construction
4/1/2007	7/31/2011	12/1/2010	9/10/2010	5699	Construction	Final Compliance w/ Eff Limits
12/1/2010	7/31/2011	12/31/201	1/07/2011	---	Other	Annual WET Report
12/1/2010	7/31/2011	12/1/2010	3/15/2011	---	Construction	Construction Plan
12/1/2010	7/31/2011	01/01/2011	3/15/2011	---	Construction	Initiate Construction
12/1/2010	7/31/2011	12/1/2010	1/07/2011	---	Pretreatment	Evaluate Existing Local Limits
12/1/2010	7/31/2011	05/01/2010	1/07/2011	52699	Pretreatment	Revise Local Pretreatment Limits
12/1/2010	7/31/2011	07/01/2011	1/07/2011	52599	Pretreatment	Tech Justification for Limits
12/1/2010	7/31/2011	7/31/2011	1/07/2011	52699	Pretreatment	Revise Local Limits (if needed)
12/1/2010	7/31/2011	04/01/2008	4/01/2008	95999	Construction	E Coli Status Report
12/1/2010	7/31/2011	10/01/2008	4/01/2008	---	Construction	Submit E Coli PTI (if needed)
2/1/2012	7/31/2016	8/1/2012		52599	Pretreatment	Revise Control documents

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
2/1/2012	7/31/2016	8/1/2012		52599	Pretreatment	Tech Justification for L Limits
2/1/2012	7/31/2016	9/1/2012		52599	Pretreatment	Revise Local Limits if Needed
2/1/2012	7/31/2016	4 mo		----	Pretreatment	Revise SUO for LL for Hg

It is noted that some information was received after the date(s) prescribed by your NPDES permit, however the information was received. Milestones associated with the current permit have not yet occurred. No additional information is needed at this time.

SSO Reporting

Ashtabula reported SSOs that occurred on September 26, 2011. The event was caused by a severe rain event in the Ashtabula area. C revised 2011 No additional information is needed at this time. Please note that the 2011 Annual SSO report is due in this office no later than March 31, 2012.

Industrial Pretreatment Program

On April 19, 2011, Ohio EPA received revisions to Ashtabula's industrial pretreatment program, which is limited to revisions to the industrial surcharge rates. As noted above, Ashtabula must evaluate its local limits and revise its sewer use ordinance (SUO), enforcement response plan (ERP) and other controlling documents and submit that information to Ohio EPA NEDO and Ohio EPA central office no later than August 1, 2012. No additional information is needed at this time.

Pretreatment limits were last revised in 1998. A technical justification report for leaving the current pretreatment limits unchanged was completed on January 7, 2011. Ashtabula has proposed changing its surcharge fee schedule, but no changes in limits are proposed. There are no pending program modifications, although Ashtabula intends to submit revisions of its SUO and local limits before August 2012. No industrial users (IUs) have been placed on a compliance schedule within the past year; however, one SIU did submit a voluntary compliance schedule. There have been no changes to the IU list. All SIUs have been inspected and sampled within the past year. No IUs have been subject to a show-cause hearing, permit revocation, filing of a civil or criminal suit, or subject to termination of service within the past year. The WPCF commenced acceptance of hauled septage from Northeast Septic and G & J Septic.

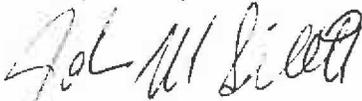
The WPCF does accept hauled septage, liquid sludge, and landfill leachate by controlling where these wastes are accepted into the system. Due to odor problems at the WPCF from accepting wastes at the acceptance station at the WPCF, Ashtabula relocated the hauled waste acceptance station, currently landfill leachate from three facilities, at station on West 24th Street. Two of these facilities are direct piped to the WPCF with the completion of the State Road sewers in late 2011. The 24th Street location provides better mixing of the waste with incoming wastewaters and produces less of a shock load to the WPCF. Ashtabula has a testing program in place and requires testing for all industrial waste permit haulers, with annual testing and some random load testing. Currently, the influent waste strength as received by the WPCF is between 100 and 120 mg/l BOD, and septage acceptance can increase these strengths.

The multi-jurisdictional sewer use agreement between Ashtabula City and Ashtabula County has still not been finalized, with the parties relying upon the satellite sewer discharge control

program from 1998. Ohio EPA recommends that the multi-jurisdictional sewer use agreement be finalized as soon as possible. A limitation in implementation of this program is lack of personnel. Mr. Mearini indicated that an industrial pretreatment director/assistant superintendent position will be advertised within the next month. As a part of the revisions to control documents to be submitted by August 2012, Ohio EPA recommends that the program fees be examined so that adequate staff can be maintained to administer this program.

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

Respectively,

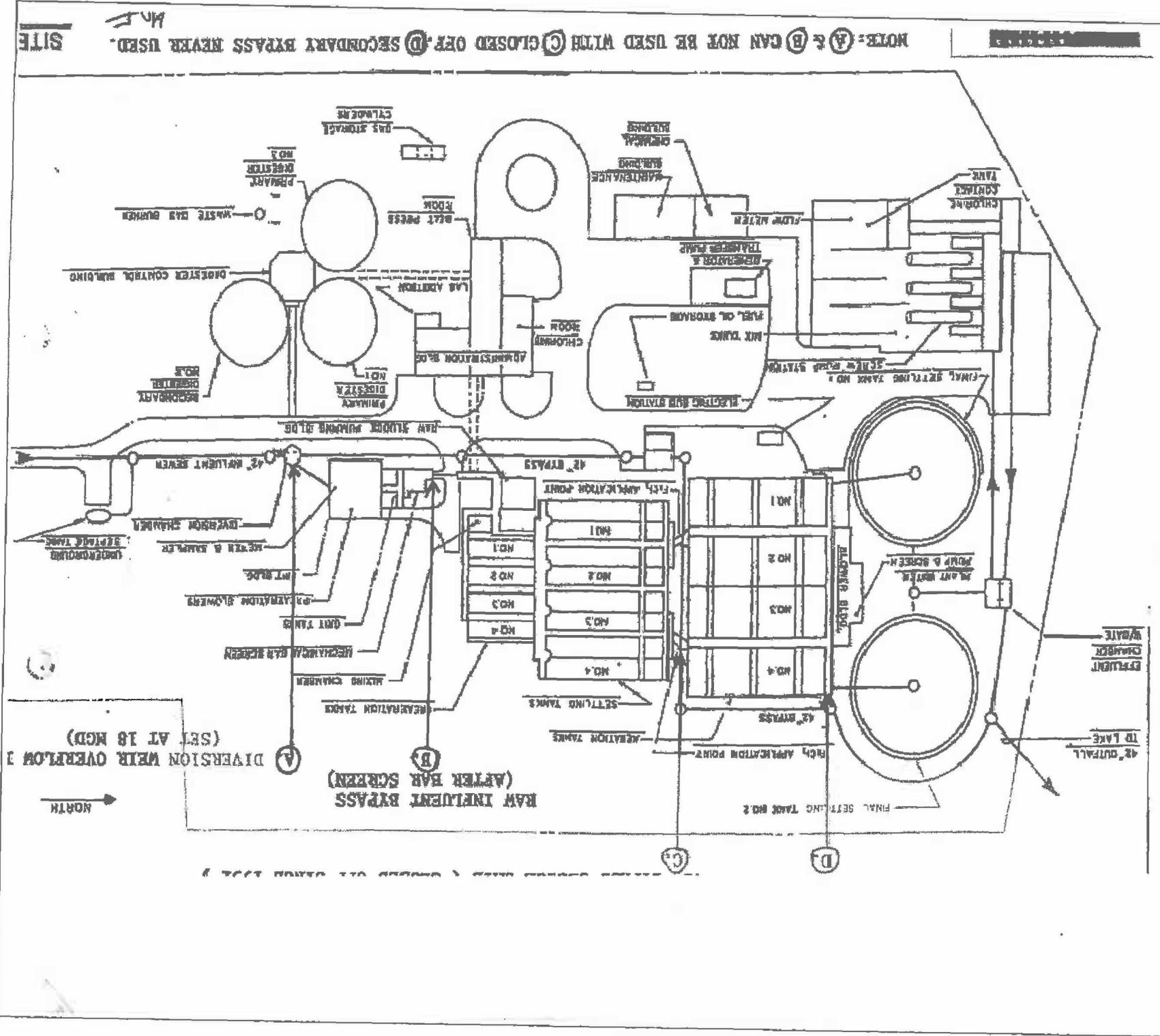


John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Michael Mearini, Ashtabula WPCF

File: Municipal/Ashtabula City WPCF (Ashtabula Co.)/PC



DIVERSION WEIR OVERFLOW (SET AT 18 MGD)

RAW INFLUENT BYPASS (AFTER BAR SCREEN)



42" INFLUENT REVER

42" BYPASS

FINAL SETTLING TANK NO. 2

42" OUTFALL TO LAKE

EFFLUENT CHAMBER

WASTE GAS BURNER

RAW WASTE WATER

FLOW METER

FLOW METER