



**Environmental
Protection Agency**

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

Re: **Notice of Violation**
Fulton County
Delta WWTP
NPDES Permit

April 27, 2012

Mr. Derek Allen
Village Administrator
Village of Delta
401 Main Street
Delta, Ohio 43515

Dear Mr. Allen:

On April 19, 2012, I conducted an inspection of the Delta Wastewater Treatment Plant. You, Mr. Scot Johnston, operator of record, and Mr. Leon Smith, contract operator, were present and provided information concerning operation and maintenance of the facility. All treatment units were in operation during the inspection and the effluent observed into Bad Creek was clear, colorless, and had no noticeable odor.

A review of the discharge monitoring reports (DMRs) from August 2011 to April 2012 shows that there have been several effluent limit violations. The specific instances of noncompliance are enclosed on a separate sheet. It is noted that the facility has not had an effluent limit violation for the previous five months.

It is also noted that the facility is working on the ten process control items that Fluidyne recommended in their service report. In process ammonia and alkalinity data is being collected and the facility has ordered a TSS probe to be used for process control of the solids.

It was noted that the operators believe that an influent flow meter would allow for better control of the treatment system. The gate valve at the head of the plant is being used to limit flow through the plant to prevent the influent pump station from flooding and washing solids out of the SBR tanks. Without the influent flow meter, the operators are not able to adjust the influent gate properly to maximize flow through the plant. This results in the collection system backing up and the potential for an increase in combined sewer overflows (CSOs).

The completed inspection report is enclosed. If you have any questions, please contact me at (419) 373-3053.

Sincerely,

Ryan Gierhart
Division of Surface Water

/jlm
Enclosures
pc: Mayor and Council
ec: Inspection Tracking



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
2PB00003	OH0020974	4/19/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Delta WWTP 516 Locust Street Delta, OH 43515	1:00 pm	June 1, 2007
	Exit Time 3:00 pm	Permit Expiration Date May 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Scot Johnston, Operator of Record Mr. Derek Allen, Village Administrator Mr. Leon Smith, Contract Operator	(419) 822 - 3244 (WWTP) (419) 822 - 4143 (WTP) (419) 822 - 5168 (Fax)	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council Village of Delta 401 Main St. Delta, OH 43515	(419) 822 - 5300 (419) 822 - 3190	

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	N	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Discharge flow was clear with no noticeable odor. Very little flow was discharging during the inspection.	
Inspector	Reviewer
 Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
4-24-12 Date	4/24/12 Date

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) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... N/A

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES permit
- (f) Permittee is in compliance with schedule..... N
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
 - i. What does the back-up power source operate.....

Generator can run the whole plant

- ii. How often is the generator tested under load.....

Every Week

- (b) Which components have an alarm system available for power or
equipment failures.....

The main power supply is telemetered

High water alarms in wet wells

Alarms for SBR are tied into PLC

- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... Y
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained.... Y
- (g) Any plant bypasses since last inspection..... N
- (h) Any plant upsets since last inspection..... Y

Comments/Status:

Plant upsets have been observed when high precipitation events have created a loss of micro-organisms in the SBR units.

Maintenance sheets are placed by each piece of equipment. It was recommended that a routine preventative maintenance schedule be developed for the equipment.

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... III
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hard bound book

- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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 operator and maintenance activities (including preventative maintenance, repairs and request

- for repairs, process control test results, etc.)..... Y
- iv. Laboratory results (unless documented on bench sheets)... Y
- v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications 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

Comments/Status:

Operator time is kept in a monthly calendar book. A separate book is kept for daily records of activities.

Section G: Operation & Maintenance cont

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....0
 - ii. How many pump stations have telemetered alarms.....5
 - iii. How many pump stations have operable alarms.....5
- (b) Any chronic collection system overflows since last inspection..... Y
- (c) Regulatory agency notified of all overflows..... Y
- (d) CSOs in the collection system....if so, what is the LTCP status..... Y

Facility is behind schedule on the LTCP. The Village is working on revising the LTCP for the collect and treat approach rather than total separation.
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... Visual
- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... N/A
- (h) Any WIB complaint received since last inspection..... Y
- (i) Is there a WIB response plan..... Y
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

Comments/Status:

CSOs are monitored visually by staff. The Adrian street lift station has been telemetered in the previous year. There was a discussion on the Superior street CSO, which is believed to be separate storm sewer and not tied into sanitary. The Village would have to verify that it is separated by providing sampling data from the outfall for ecoli or fecal coliform to show that sanitary is not connected into the system.

Section H: Sludge Management

- (a) Method of Sludge Disposal...
 - Land Application
 - Haul to Another NPDES Permittee

Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

- (b) Has amount of sludge generated changed significantly since the last inspection..... Y
- (c) How much sludge storage is provided at the plant.....

120 days

- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

Comments/Status:

It was noted that sludge had recently been removed from the facility. The holding tank and aeration tank sludge levels were low.

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 -- Aerobic Bench Scale Analysis	Option 4 -- Specific Oxygen Uptake Rate	Option 5 -- Aerobic Time and Temperature	Option 6 -- Alkali Addition	Option 7 -- >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 -- Land Injection	Option 10 -- Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 -- Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 -- Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

Ultrasonic level with weir. Totalizer

- (b) Flow meter calibrated annually Y
 (Date of last calibration: 4/15/2010)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

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)
- (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

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable:

<ul style="list-style-type: none"> • Title • Scope and Application • Summary • Sample Handling and Preservation • Interferences • Apparatus and Materials • Reagents 	<ul style="list-style-type: none"> • Procedure • Calculations • Quality Control • Maintenance • Corrective Action • Reference (Parent Method)
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Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "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." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, O&G, Nitrate + Nitrite, Cyanide

Lab name: Jones and Henry,

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

The CBOD test was evaluated during the inspection. The need to monitor pH for the test was noted and the procedure should be placed in the SOP.

Section J: Effluent/Receiving Water Observations

Outfall # 2PD00016001

Outfall Description: Outfall observed was clear, colorless with no noticeable odor. Very little flow was discharging during the inspection; it appeared that none of the SBRs went into decant mode.

Receiving Stream: Bad Creak

Receiving Stream Description: Stream appeared clear with steady flow.

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

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

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	Backflow preventer.
	Safety Features	S	Fencing and guard rails.
	Bypasses	NA	
	Stormwater Overflows	NE	Not evaluated.
	Alternate Power Source	S	Generator. Tested every Tuesday. Runs entire plant.
Preliminary	Maintenance of Collection Systems	NE	
	Pump Station	IN	Four pumps. Alternate lead pump weekly. 1 MGD each.
	Ventilation	S	
	Bar Screen	OUT	Used as a backup. On standby. Used when flow exceeds 2 MGD.
	Disposal of Screenings	S	Landfill.
	Comminutor	IN	Two Muffin Monsters. One in service, one on standby. 1 MGD each.
	Grit Chamber	IN	Grey color. Can bypass to SBRs. Aerated.
	Disposal of Grit	S	Landfill.
Septage	Influent control Gate	IN	Gate is adjusted to control flow into plant from collection system.
	Bar Rack	OUT	Septage is currently not being received at the facility.
	Disposal of Screenings	S	
	Aeration Tank	OUT	
Sludge Disposal	Digesters	IN	Aerobic digester, Low level
	Sludge Holding tank	IN	Low level
	Sludge Pumps	IN	Not evaluated.
	Drying Beds	IN	5 beds
	Disposal of Sludge	S	Land application or landfill.
	Flow Meter and Recorder	IN	V-notch weir and ultra sonic flow meter
	Records	NE	
Other	Lab Controls	NE	
	Chemical Treatment	IN	Alum fed prior to grit chamber
	Automatic Sampler	IN	Final effluent.
	SBR 1	IN	Idol Mode
	SBR 2	IN	Idol Mode.
Secondary-Tertiary List items as required	SBR 3	IN	Idol Mode.
	Post Aeration	IN	Clear and aerated.
	Blowers	IN	Six total. Two on for septage and post air. Three on as needed for SBRs. One left for standby.
	Effluent	S	Clear. Colorless. No odors.
	Disinfection System	OUT	Chlorine.
Disinfection	Effective Dosage	S	4.5 mg/l.
	Contact Time	S	30+ minutes.
	Contact Tank	OUT	Clear. Serpentine tank. Can be sent to head of plant.
	Dechlorination	OUT	Sulfur dioxide gas.

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PB00003*LD	August 2011	001	00530	Total Suspended Solids	7D Conc	30	31.5	8/1/2011
2PB00003*LD	August 2011	001	31648	E. coli	7D Conc	362	3872.98	8/1/2011
2PB00003*LD	September 2011	001	00530	Total Suspended Solids	7D Conc	30	31.5	9/8/2011
2PB00003*LD	September 2011	001	00530	Total Suspended Solids	7D Qty	82	155.546	9/8/2011
2PB00003*LD	October 2011	001	00530	Total Suspended Solids	7D Qty	82	113.004	10/15/2011