



**Environmental
Protection Agency**

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

Re: Erie County
Sandusky
NPDES Permit

May 2, 2012

Mr. Todd Roth, P.E.
Director of Engineering Services
222 Meigs Street
Sandusky, Ohio 44870

Dear Mr. Roth:

On April 17, 2012, an inspection was made of the wastewater treatment facilities serving the City of Sandusky. Mr. Jeff Meinert, Superintendent, was present and provided information on plant operations. At the time of our visit, all treatment units were in operation, and a very clear final effluent was observed discharging from the plant. Our comments are as follows:

- 1) Mr. Meinert has been able to treat up to the design 42 million gallons peak wet weather flow; however, a bottleneck has surfaced at the aerated grit tanks. Preliminary work has begun to address this issue and once resolved may lead to increased wet weather treatment capacity above design.

The next phase of the General Plan is addressing the two major CSO's at Ogontz and Mills Street. Now that the main interceptor is cleaned, real flow numbers will be used to re-model the collection sewer. A determination will then be made on whether to design for satellite retention basins or bring the additional flow to the plant to treat with a form of high rate compact clarification.

- 2) The main interceptor cleaning project was completed last November and has had a direct effect on some CSO outfalls due to increased, unobstructed flow to the plant. The number, volume and length of overflow events have decreased, and Mr. Meinert indicated that up to three CSO's may be able to be permanently closed. If this occurs, please document the closures and notify me so we are able to eliminate them in the upcoming National Pollutant Discharge Elimination System (NPDES) permit renewal.

A review of CSO activity indicated 37 reported events in 2011. CSO outfalls are being posted when active, and telephone and written notification following overflow events are being received in a timely manner.

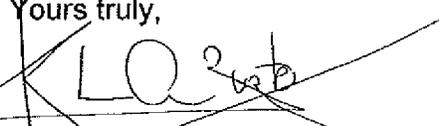
- 3) NPDES monthly discharge monitoring reports indicated two E.coli bacteria limit violations in 2011. One due to a lightning strike and backup generator malfunction, which was fixed, and the second attributed to storm induced turbidity and ferrous stains on the U.V. bulbs. Work is nearly complete on rehabilitating the lead U.V. disinfection unit, including all new lamp modules. Two suspended solids concentration/loading violations were attributed to a combination of high flow and isolated development of filamentous bacteria in the clarifiers. This was remedied by increasing the sludge waste rate.

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- 4) Sewer use/rate negotiations with Erie County are being finalized, which will allow the Village of Bay View to connect into the city's collection system. Due to wet weather flow limitations at the Venice pump station, connection will be into a downstream sewer with adequate capacity.
- 5) The Mercury Pollutant Minimization Plan (PMP) is being implemented. All significant industries and dental offices have been sampled and have not shown to be major sources of mercury. The city has an ongoing mercury thermometer exchange program, and is working with Erie County to host household hazardous waste collection events. Schools and nursing homes are scheduled to be checked this year. Please continue to implement the mercury PMP as approved.
- 6) Mr. Meinert and his staff continue to operate and maintain the facility very well, and we appreciate their dedication. The lab personnel were once again recognized by U.S. EPA for achieving 100% compliance with the most recent U.S. EPA laboratory quality assurance performance evaluation program # 31.
- 7) The current NPDES Permit expires July 31, and we have received the renewal application. Due to manpower constraints, we do not anticipate the renewal to be issued prior to the expiration date. In the future, you will be receiving a "draft" copy of the NPDES permit renewal. You should review it carefully, as there is a 30 day comment period to respond to any permit conditions. Please continue to operate under all current permit conditions until the renewed permit becomes effective.

My completed inspection is enclosed. If there are any errors, or you have any questions, please call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us.

Yours truly,



Richard A. Zuzik, MSE
Division of Surface Water

/jlm

Enclosure

pc: Jeff Meinert, Superintendent

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
2PF00001*ND	OH0027332	4/17/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Sandusky WPC Plant 304 Harrison St Sandusky, OH 44870	10:00 am	4/1/2010
	Exit Time	Permit Expiration Date
	12:00 pm	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jeff Meinert, Superintendent	(419)627-5907	
Name, Address and Title of Responsible Official	Phone Number	
Todd Roth, P.E., Director of Engineering	(419) 627-5831	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Inspector	Reviewer
 Richard A. Zuzik, MSE 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 4-30-12	Date 4/30/12

Permit # : 2PF00001*ND
NPDES #: OH0027332

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..... Y
- (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:

Permit expires July 31, 2012. Renewal application submitted.

Section F: Compliance Schedules/Violations

- (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 NPDES and Director's Findings and Orders
- (e) Permittee is meeting compliance schedule..... Y

Comments/Status:

Director's Findings and Orders for CSO's – Improvements on schedule, addressing Ogontz and Mills St next

All items in NPDES Compliance Schedule met

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..... Y
 Class: III
- (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..... Y
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N/A
- (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..... Y
 (Grit Chamber surcharges over 42 mgd)

Record Keeping:

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

Hard bound Logbook

- (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: 80%
- (b) Any collection system overflows since last inspection..... Y
(CSO X and/or SSO)
- (c) Regulatory agency notified of overflows (CSOs)..... 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..... 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 N
- (k) Are any portions of the sewer system at or near capacity..... N

Comments/Status:

37 CSO events in 2011- Lesser volume and duration since main interceptor cleaning project completed

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: 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..... Y
(Name: Fertility Builders)
(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)..... N/A

Comments/Status:

Centrifuge producing 36% solids- all sludge disposed of in landfill

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: 9/14/11)
(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:



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..... Y
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, Mercury

Lab name: Jones & Henry, 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: X Satisfactory Marginal Unsatisfactory

Date: 7/11, #31,

Comments/Status:

100% accuracy

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	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: