



Environmental
Protection Agency

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

September 4, 2012

Mr. Tom Welbaum
Village Administrator
Village of Ansonia
P.O. Box 607
Ansonia, Ohio 45303

**RE: VILLAGE OF ANSONIA WWTP, NPDES PERMIT NO. 1PB00005*KD /
OH0023884 COMPLIANCE EVALUATION & PRE-PERMIT RENEWAL
INSPECTION**

Dear Mr. Welbaum:

On Friday, August 24, 2012, Joe Miller and I met with you and Don DeMange, Public Works Director, to review the overall compliance of the Village's wastewater collection and treatment system with the terms and conditions of the Village's NPDES permit. A copy of the inspection report is enclosed. As indicated in the attached report, three of the areas that were evaluated during the inspection received ratings other than "Satisfactory."

The area designated as "Effluent/Receiving Waters" received an "Unsatisfactory" rating due to violations of the final effluent limitations in this facility's current NPDES permit (1PB00005*KD) that occurred between June 1, 2011, through June 30, 2012.

The area designated as "Collection System" received a "Marginal" rating due to the Village's inability to meet a deadline for eliminating all of the CSO's in its wastewater collection system. The compliance schedule in the Village's current NPDES permit (1PB00005*KD), indicates that all of the CSO's in Ansonia's wastewater collection system were to have been eliminated by July 31, 2010.

The area designated as "Compliance Schedule" received a "Marginal" rating due to the Village's inability to meet deadlines for complying with an effluent limit for Total Phosphorus of 288 kg/year (annual total) and eliminating all of the CSO's in its wastewater collection system.

A draft renewal NPDES permit for this facility (1PB00005*LD) has been prepared and will be sent out to public notice in the coming months. This draft permit will have the following requirements:

Effluent Sampling

For parameters for which composite sampling is required (CBOD₅, Total Suspended Solids, Ammonia – Nitrogen, etc.), the type of composite sampling to be used for these parameters is described in Paragraph I in Part II of the renewal NPDES permit. This description reads as follows:

“Composite samples of the effluent shall be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the sewage flow rate at the time of sampling. Such samples shall be collected at such times and locations, and in such a fashion, as to be representative of the facility's overall performance.”

In addition, the collected effluent samples need to be refrigerated to 6° C +/- 2° in order to preserve them prior to lab analysis.

Effluent Disinfection Standard

Due to changes in State of Ohio's Water Quality Standards, the disinfection standard in NPDES permits has been changed from fecal coliform to E. coli. For the Village's treatment plant, the applicable E. coli standards will be 161 counts/100 ml (monthly geometric mean) and 362 counts/100/ ml (weekly geometric mean). Interim and final effluent tables, along with a compliance schedule have been added to the draft renewal permit to allow the Village some time to evaluate whether its treatment works can comply with the new limits for E. coli.

The Village's written requests for time extensions for 1) eliminating the CSO's in its wastewater collection system; and 2) for the schedule to achieve compliance with its final effluent limit for Total Phosphorus, have been written into draft renewal NPDES permit 1PB00005*LD.

On the issue of compliance with the effluent limit for Total Phosphorus, it was mentioned during the part of the inspection that was held at the Village's water plant lab, that the Village adds phosphate to its drinking water supply. No clear reason was given as to why this is done. Due to the Village's inability so far to consistently meet a final effluent concentration limit for Total Phosphorus of 1.0 mg/l, it is recommended that the Village discuss this addition of phosphate to its drinking water supply with staff from our

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Division of Drinking and Ground Waters to see if there could be an opportunity to reduce or eliminate this phosphate additive.

Please provide this office with a written response to the findings in this inspection by October 5, 2012. If you have any questions, you can reach me at (937) 285 - 6098 or via email at ron.ware@epa.state.oh.us.

Sincerely,



Ron Ware
Environmental Specialist
Division of Surface Water

Enclosure

cc: Darke County Health Department

RWbp

ermit # : 1PB00005*KD
NPDES #: OH0023884

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..... N
- (e) Number and location of discharge points are as described
in permit..... Y

Comments/Status:

Section F: Compliance

- (a) Any effluent violations over the past year 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

Comments/Status:

(a) A list of violations is provided on pages 7 thru 9 of this report.

(f) The Village has submitted written requests to the Southwest District Office for time extensions on the compliance schedule (for elimination of the remaining seven CSO's in the collection system and for complying with the final effluent limit for total phosphorus).

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained
(portable)

- (a) Standby power available.....generator or dual feed Y
- (b) All treatment units in service other than backup units..... Y
- (c) Routine & preventative maintenance scheduled/ performed..... Y
- (d) Any major equipment breakdown since last inspection..... N
- (e) Operation and maintenance manual provided and maintained..... Y
- (f) Any plant bypasses since last inspection..... N
- (g) Any plant upsets since last inspection..... N

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (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)

Spiral bound notebook

- (i) Log book kept onsite (in an area protected from weather)..... N
- (j) Log book contains the following:
 - I. Identification of treatment works..... N
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - ii. Laboratory results (unless documented on bench sheets)... N
 - iii. 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:

Record Keeping/Operator of Record:

- (c) - The Operator of Record certificate is displayed at the waterworks building on Canal St.
- (i) - The Operator of Record log book is kept at the waterworks building on Canal St.
- (j) - The Operator of Record log book does not have the name of the wastewater treatment works on the cover.

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y
(There are 4 pump stations in the collection system for this facility)
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent..... 4
 - ii. How many pump stations have telemetered alarms..... 0
 - iii. How many pump stations have operable alarms..... 0
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... Y
- (d) Are there CSOs in the collection system..... Y
- (e) How are CSOs monitored (chalk, block, level sensor, etc.).....

Visual check
- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... N
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... N
- (j) Is any portion of the collection system at or near dry weather capacity..... N

Comments/Status:

Funding and Permits to Install have been obtained to begin the final phase of separation work on the collection system. Construction is set to begin in the fall season. CSO's # 10, 11 and 12 were eliminated during the previously completed sewer separation work.

There are four lift stations in the collection system. Each station is checked on a daily basis. The stations are located at the following places:

1. Main lift station near banks of Stillwater River north of E. Cross St.
2. Water tower.
3. Church property
4. Mobile Home Park

There are three inch portable pumps available the three smaller lift stations and a portable generator for the main lift station.

Section I: Self-Monitoring Program

Flow Measurement:

Primary/Secondary flow measuring device

In line meter that measures velocity and depth

- (a) Flow meter calibrated annually N/E
- (b) Flow measurement equipment adequate to handle full range of flows Y
- (c) All discharged flow is measured..... Y

Comments/Status:

The flow meter has been repaired since the last inspection in June 2011.

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) 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) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N/E
- (b) Do SOP's include the following if applicable..... N/E
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - 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..... N/A
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: Ammonia nitrogen, nitrates & nitrites, oil & grease, total phosphorus, total suspended solids, CBOD₅, bacteria

Lab name: Belmonte Laboratories

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 1PB00005*KD

Outfall Description: Plant outfall pipe to the North Fork of the Stillwater River near the confluence with the Stillwater River

Receiving Stream: The North Fork of the Stillwater River

Receiving Stream Description: Warm Water Habitat, Agricultural Water Supply, Industrial Water Supply, Primary Contact Recreation

Comments/Status:

There was no discharge from the treatment works to the receiving stream during the inspection.

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Effluent Limit Violations

(Period of Review: June 2011 - June 2012)

7D = Weekly 30D = Monthly 1D = Daily
 Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	CBOD 5 day	30D Conc	25	25.175	6/1/2011
June 2011	Phosphorus, Total (P)	30D Conc	1.0	1.475	6/1/2011
June 2011	Phosphorus, Total (P)	30D Qty	1.52	1.71464	6/1/2011
June 2011	pH	1D Conc	9.0	9.2	6/1/2011
June 2011	pH	1D Conc	9.0	9.1	6/3/2011
June 2011	pH	1D Conc	9.0	9.4	6/7/2011
June 2011	pH	1D Conc	9.0	9.3	6/8/2011
June 2011	pH	1D Conc	9.0	9.3	6/9/2011
June 2011	Phosphorus, Total (P)	7D Conc	1.5	1.58	6/15/2011
June 2011	pH	1D Conc	9.0	9.1	6/16/2011
June 2011	pH	1D Conc	9.0	9.3	6/28/2011
June 2011	pH	1D Conc	9.0	9.3	6/29/2011
June 2011	pH	1D Conc	9.0	9.4	6/30/2011
July 2011	TSS	30D Conc	65	71.2125	7/1/2011
July 2011	CBOD 5 day	30D Conc	25	26.7	7/1/2011
July 2011	Phosphorus, Total (P)	30D Conc	1.0	1.39	7/1/2011
July 2011	pH	1D Conc	9.0	9.4	7/1/2011
July 2011	pH	1D Conc	9.0	9.4	7/5/2011
July 2011	pH	1D Conc	9.0	9.2	7/6/2011
July 2011	pH	1D Conc	9.0	9.1	7/7/2011
July 2011	pH	1D Conc	9.0	9.3	7/12/2011
July 2011	pH	1D Conc	9.0	9.2	7/13/2011
July 2011	Phosphorus, Total (P)	7D Conc	1.5	1.66	7/15/2011
Aug. 2011	TSS	30D Conc	65	95.1625	8/1/2011
Aug. 2011	TSS	7D Conc	90	91.5	8/1/2011
Aug. 2011	CBOD 5 day	30D Conc	25	34.05	8/1/2011
Aug. 2011	Phosphorus, Total (P)	30D Conc	1.0	1.835	8/1/2011
Aug. 2011	Phosphorus, Total (P)	7D Conc	1.5	1.69	8/1/2011
Aug. 2011	TSS	7D Conc	90	93.5	8/8/2011
Aug. 2011	CBOD 5 day	7D Conc	40	57.5	8/8/2011
Aug. 2011	TSS	7D Conc	90	95.65	8/15/2011
Aug. 2011	Phosphorus, Total (P)	7D Conc	1.5	1.98	8/15/2011
Aug. 2011	pH	1D Conc	9.0	9.1	8/19/2011
Aug. 2011	TSS	7D Conc	90	100.	8/22/2011
Sept. 2011	TSS	30D Conc	65	77.175	9/1/2011
Sept. 2011	TSS	7D Conc	90	95.2	9/1/2011
Sept. 2011	Fecal Coliform	30D Conc	1000	1082.89	9/1/2011

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
Sept. 2011	CBOD 5 day	30D Conc	25	26.2875	9/1/2011
Sept. 2011	Phosphorus, Total (P)	30D Conc	1.0	1.825	9/1/2011
Sept. 2011	Phosphorus, Total (P)	7D Conc	1.5	1.93	9/1/2011
Sept. 2011	pH	1D Conc	9.0	9.1	9/1/2011
Sept. 2011	Phosphorus, Total (P)	7D Conc	1.5	1.72	9/15/2011
Oct. 2011	Phosphorus, Total (P)	30D Conc	1.0	1.57	10/1/2011
Oct. 2011	Phosphorus, Total (P)	7D Conc	1.5	1.69	10/1/2011
Oct. 2011	Phosphorus, Total (P)	7D Qty	2.28	2.39235	10/1/2011
Nov. 2011	Phosphorus, Total (P)	30D Conc	1.0	1.0035	11/1/2011
Dec. 2011	CBOD 5 day	30D Qty	33.1	34.8891	12/1/2011
Dec. 2011	Phosphorus, Total (P)	30D Qty	1.52	2.21595	12/1/2011
Dec. 2011	Phosphorus, Total (P)	7D Qty	2.28	2.39591	12/15/2011
Feb. 2012	Phosphorus, Total (P)	30D Conc	1.0	1.13	2/1/2012
Feb. 2012	Phosphorus, Total (P)	30D Qty	1.52	1.59962	2/1/2012
Feb. 2012	pH	1D Conc	9.0	9.3	2/21/2012
Feb. 2012	pH	1D Conc	9.0	9.4	2/23/2012
Feb. 2012	pH	1D Conc	9.0	9.3	2/27/2012
Feb. 2012	pH	1D Conc	9.0	9.4	2/28/2012
Feb. 2012	pH	1D Conc	9.0	9.3	2/29/2012
Mar. 2012	Phosphorus, Total (P)	30D Conc	1.0	1.53	3/1/2012
Mar. 2012	pH	1D Conc	9.0	9.3	3/1/2012
Mar. 2012	pH	1D Conc	9.0	9.5	3/2/2012
Mar. 2012	pH	1D Conc	9.0	9.6	3/5/2012
Mar. 2012	pH	1D Conc	9.0	9.5	3/6/2012
Mar. 2012	pH	1D Conc	9.0	9.4	3/7/2012
Mar. 2012	CBOD 5 day	7D Conc	40	41.65	3/8/2012
Mar. 2012	pH	1D Conc	9.0	9.3	3/8/2012
Mar. 2012	pH	1D Conc	9.0	9.4	3/9/2012
Mar. 2012	pH	1D Conc	9.0	9.5	3/12/2012
Mar. 2012	pH	1D Conc	9.0	9.5	3/13/2012
Mar. 2012	pH	1D Conc	9.0	9.3	3/14/2012
Mar. 2012	pH	1D Conc	9.0	9.2	3/15/2012
Mar. 2012	Phosphorus, Total (P)	7D Conc	1.5	1.61	3/22/2012
April 2012	TSS	30D Conc	65	65.25	4/1/2012
April 2012	CBOD 5 day	30D Conc	25	30.7125	4/1/2012
April 2012	Phosphorus, Total (P)	30D Conc	1.0	1.66	4/1/2012
April 2012	Phosphorus, Total (P)	7D Conc	1.5	1.71	4/1/2012
April 2012	pH	1D Conc	9.0	9.3	4/9/2012
April 2012	pH	1D Conc	9.0	9.4	4/10/2012
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date

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April 2012	pH	1D Conc	9.0	9.2	4/11/2012
April 2012	pH	1D Conc	9.0	9.6	4/12/2012
April 2012	pH	1D Conc	9.0	9.2	4/13/2012
April 2012	Phosphorus, Total (P)	7D Conc	1.5	1.61	4/15/2012
April 2012	pH	1D Conc	9.0	9.3	4/16/2012
April 2012	pH	1D Conc	9.0	9.4	4/17/2012
April 2012	pH	1D Conc	9.0	9.2	4/18/2012
April 2012	pH	1D Conc	9.0	9.4	4/19/2012
April 2012	pH	1D Conc	9.0	9.4	4/20/2012
April 2012	pH	1D Conc	9.0	9.3	4/23/2012
April 2012	pH	1D Conc	9.0	9.5	4/24/2012
April 2012	pH	1D Conc	9.0	9.5	4/25/2012
April 2012	pH	1D Conc	9.0	9.3	4/26/2012
April 2012	pH	1D Conc	9.0	9.2	4/27/2012
April 2012	pH	1D Conc	9.0	9.2	4/30/2012
May 2012	Phosphorus, Total (P)	30D Conc	1.0	1.21	5/1/2012
May 2012	pH	1D Conc	9.0	9.2	5/2/2012
May 2012	pH	1D Conc	9.0	9.1	5/11/2012
June 2012	TSS	30D Conc	65	84.34	6/1/2012
June 2012	Phosphorus, Total (P)	30D Conc	1.0	1.59	6/1/2012
June 2012	Phosphorus, Total (P)	7D Conc	1.5	1.59	6/1/2012
June 2012	pH	1D Conc	9.0	9.1	6/4/2012
June 2012	pH	1D Conc	9.0	9.1	6/5/2012
June 2012	pH	1D Conc	9.0	9.2	6/6/2012
June 2012	pH	1D Conc	9.0	9.2	6/7/2012
June 2012	pH	1D Conc	9.0	9.3	6/8/2012
June 2012	pH	1D Conc	9.0	9.2	6/18/2012

Effluent Monitoring Frequency Violations - June 2011 - June 2012

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
Nov. 2011	001	Total Suspended Solids	2/Week	2	1	11/22/2011
Nov. 2011	001	CBOD 5 day	2/Week	2	1	11/22/2011
Nov. 2011	601	Total Suspended Solids	2/Week	2	1	11/22/2011
Nov. 2011	601	CBOD 5 day	2/Week	2	1	11/22/2011
Nov. 2011	602	Total Suspended Solids	2/Week	2	1	11/22/2011
Nov. 2011	602	CBOD 5 day	2/Week	2	1	11/22/2011
Nov. 2011	602	pH	2/Week	2	1	11/22/2011
Nov. 2011	602	Flow Rate	2/Week	2	1	11/22/2011
Jan. 2012	001	Phosphorus, Total (P)	1/2Weeks	1	0	01/01/2012
Feb. 2012	001	Phosphorus, Total (P)	1/2Weeks	1	0	02/15/2012