



**Environmental
Protection Agency**

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

Re: Sandusky County
Fremont WPCC
NPDES Permit 2PD00007/OH0025291
Compliance Evaluation Inspection

September 21, 2012

Mayor and Council
City of Fremont
323 South Front Street
Fremont, Ohio 43420

Dear Mayor and Council:

On September 5, 2012, a Compliance Evaluation Inspection (CEI) was conducted at the Fremont Water Pollution Control Center (WPCC). Present for the inspection were Mr. Jeff Lamson, Superintendent, Mr. Josh Wehring, Assistant Superintendent, and Ms. Mary Beth Cohen and Ms. Peggy Christie of the Ohio EPA, Northwest District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the operation and maintenance of the plant.

The wastewater treatment plant (WWTP) and buildings are showing signs of aging. It was indicated that repairs to maintain safety and proper operation of the plant are performed as necessary. All other repairs are being postponed in anticipation of construction of new facilities.

A sign is to be posted at the stream bank where outfall 001 enters the Sandusky River as per Part II, Item Z of your NPDES permit.

Several additional compliance schedule items are due before the end of the year. A compliance schedule summary has been included in the enclosed report.

Additionally, a compliance review of your discharge monitoring reports (DMRs) was conducted. A list of permit violations (September 1, 2011 to August 31, 2012) is enclosed.

If you have any questions or comments concerning the enclosed inspection report, please contact Peggy Christie at 419-373-3006 or by e-mail at Margaret.Christie@epa.state.oh.us.

Sincerely

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

PC/jlm
Enclosures

cc: Jeff Lamson, Superintendent, City of Fremont
Peggy Christie
Tracking

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PD00007	OH0025291	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
9/5/2012	9:15 AM	1:55 PM		

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Fremont WPCC 1019 Sand Street Fremont, OH 43420	6/1/2012
	Permit Expiration Date
	1/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Jeff Lamson, Superintendent Josh Wehring, Assistant Superintendent	419-334-3876
Name and Title of Responsible Official	Phone Number
Mayor & Council, City of Fremont 323 S. Front St Fremont, OH 43420	(419) 334-9556

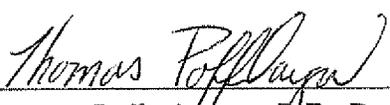
SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	NPDES Compliance	A compliance schedule is included in the permit
S	Operations & Maintenance	
M	Facility Site Review	Essential repairs are made as needed
N	Collection System	
S	Flow Measurement	
N	Receiving Waters	
N	Laboratory	

Comments:

Signatures

	9/20/12		9/20/12
Peggy Christie, Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	Date	Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office	Date

Compliance Data for Fremont WPCF between 9/1/2011 to 8/31/2012

Summary

Permit Effluent Limit Violations: 2

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2012	001	Strontium, Total (Sr)	30D Qty	194.62	200.005	1/1/2012
March 2012	001	Mercury, Total (Low Le	30D Conc	1.3	1.32917	3/1/2012

Current Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
November 2012		21599	Other	Special Study
December 2012		52599	Pretreatment	Eff Limits For Pollutants
December 2012		53199	Pretreatment	Pretreatment Pgm Submission
January 2013		97899	Other	Other
January 2013		88899	Other	Other
March 2013		1299	Construction	Final Plan Submitted
March 2013		1299	Construction	Final Plan Submitted
June 2013		52699	Pretreatment	App of Eff Limits for Polluts
January 2014		5599	Construction	Operational Level Attained
June 2014		3099	Construction	Begin Construction
January 2016		5599	Construction	Operational Level Attained

Flow Data for Fremont WPCF between 9/1/2011 and 8/31/2012

Average Flow Rate is 6.299 MGD

Ten Highest Flows	
Date	Flows (MGD)
11/28/2011	10.434
11/29/2011	9.917
12/1/2011	9.739
11/30/2011	9.728
12/2/2011	9.446
11/27/2011	9.383
12/7/2011	9.379
11/23/2011	9.278
12/11/2011	9.265
1/4/2012	9.158

SECTION D: PERMIT VERIFICATION

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters Y
- (c) Products and production rates conform with permit application Y
- (d) Flows and loadings conform with NPDES permit Y
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process 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

SECTION E: 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) Permittee is meeting compliance schedule Y

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? Generator
- (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 Class IV
- (e) Operator of Record holds unexpired license of class required by Permit..
Class held: III – Operator has 12 months to achieve Class IV
- (f) Copy of certificate of Operator of Record displayed on-site Y
- (g) Minimum operator staffing requirements fulfilled Y
- (h) Routine and preventative maintenance scheduled and 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 No
- (l) Regulatory agency notified of bypasses N/A
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection No

Comments:

- RAS pump out for repair with a spare on site
- DO monitors in aeration tanks out. Facility now manually monitors DO
- PEL limit for Mercury was exceeded on three occasions. Loadings were still below the previous loading limit.

SECTION G: RECORD KEEPING

- a) Log book provided..... Y
- b) Format of log book (i.e. computer log, hard bound book)
 - *Daily logs are placed in a three ring binder.*
- 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).....
 - v) Identification of person making log entries Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

SECTION H: COLLECTION SYSTEM

- a) Percent combined system: **75%**
- b) Any collection system overflows since last inspection.....
 CSO SSO
- c) Regulatory agency notified of overflows Y
- d) CSO O&M plan provided and implemented. Y
- e) CSOs monitored and reported in accordance with permit Y
- f) Portable pumps are used to relieve system N
- g) Lift station alarms provided and maintained Y
- h) 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
- l) Are operations changed during high-flow events?..... Y
 Plant will operate at maximum flow.

Comments:

- *A collapsed sewer is currently under repair*
- *Storm related basement flooding complaint in separate sewer area was due to a storm sewer capacity issue.*
- *During wet weather, portions of the sewer system are at capacity.*

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP) last audited by Ohio EPA: *June 24, 2010*
- b) Sludge adequately disposed Y
Method: Land application
- c) If sludge is incinerated, where is ash disposed of N/A
- d) Is sludge disposal contracted Y
Name: Midwest Compost
- e) Has amount of sludge generated changed significantly N
- f) Adequate sludge storage provided at plant N
- *90-100 days of storage provided*
- g) Records kept in accordance with State and Federal law Y
- h) Any complaints received last year regarding sludge N
- i) Is sludge adequately processed (digestion, pathogen control)...*Class B sludge, doesn't meet vector attraction requirements, so the sludge must be injected or incorporated.*

Comments:

- *A slight increase in sludge volume is thought to be cause by Heinz Plant's increased production.*
- *Midwest Compost currently has a portable sludge press on site and in use.*

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained Y
Type of device: Mag Meters Device location: Influent
- b) Calibration frequency adequate *
- c) Secondary instruments operated and maintained Y
- d) Flow measurements equipment adequate to handle full range of flows Y
- e) Actual flow discharged is measured N
- f) Flow measuring equipment inspection frequency *Inspected daily*
- g) Sampling location(s) are as specified by permit Y
- h) Parameters and sampling frequency agree with permit Y
- i) 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

Comments:

- *It was indicated that calibration of the flow meter is checked once a year and compared to portable meters since the syphon lines cannot be drained. It is recommended that the flow meter be calibrated per manufacturer's specifications.*
- *Digital meters used to download flow rate data. The staff manually records totalizer daily before midnight.*

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) **Y**
- b) If alternate procedures are used, are they properly approved?..... **N/A**
- c) Analysis performed more frequently..... **Y**
 If yes, are results recorded in permittee's report? **Y**
- d) Commercial laboratory used: **Yes. See comments.**
 Name:
 Parameters analyzed:
- e) Quality assurance manual provided and maintained..... **Y**
- f) Calibration and maintenance of instruments is satisfactory?..... **Y**
- g) Results of last U.S. EPA quality assurance... **Satisfactory**
 Date: 8/17/12

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS -Not observed

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other

Comments:

- Jones and Henry Labs - analyze Cyanide, Hg, Mo, As, Ba, Sr, Cr, Nitrate, Nitrite, Total Nitrogen, Oil & Grease.
- Sherry Labs - analyzes sludge fecal coliform
- Alloway - performs the Bio Assay

SECTION M: MULTIMEDIA OBSERVATIONS

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories... See comments
- 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:

- *It was indicated that repairs to maintain safety and proper operation of the plant are done as necessary. All other repairs are being postponed in anticipation of construction of new facilities.*

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	M	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Bypasses	Out	
	Storm Water Overflows	Out	
	Alternate Power Source	S	Three permanent generators @ plant w/one portable for use in system
Preliminary	Maintenance of Collection Systems	-	
	Pump Station	In	
	Ventilation	In	
	Bar Screen	In	Two units (influent comes in at two different locations)
	Disposal of Screenings	S	Landfill
	Comminutor	Out	
	Grit Chamber	In	Grit removal auger is run manually every 2 hours for 15 minutes
	Disposal of Grit	S	Landfill
Primary	Grit Dewatering	In	Runs 12 X/day @ 15 min/run
	Settling Tanks	In	Two circular units, both in use
	Scum Removal	In	Landfill
	Sludge Removal	In	
Sludge Disposal	Effluent	S	Effluent appeared clear
	Digesters-Anaerobic	In	Two stage anaerobic units in series (south digester lid removed)
	Temperature and pH	S	Runs at 100°- 102°F
	Gas Production	S	Flared off (new warning sign on flare)
	Heating Equipment	In	Boiler in operation
	Sludge Pumps	In	
	Sludge Storage	M	Limited storage capacity
	Belt Filter Press	In	Midwest Compost's portable press currently in use on site
	Chemical Additive	Out	Polymer and sodium bicarbonate added to sludge as needed
	Thickener / Holding		1 aerated thickener tank, 5 sludge holding tanks
Other	Disposal of Sludge	S	Land application - sludge is incorporated
	Flow Meter and Recorder	In	
	Records	S	
	Lab Controls	-	
Secondary - Tertiary	Chemical Treatment	In	Ferrous chloride for phosphorus removal
	Aeration Treatment (step feed)	In	4 of 6 tanks in use (one tank still has IFAS media in it)
	Secondary Settling Tanks	In	2 of 3 tanks in use (third tank used in winter only) "Ash" on top of clarifiers
	Aeration blowers	In	2 of 4 in use
Disinfection	Tertiary Sand Filters	In	3 of 4 units in use
	Effluent	S	Final effluent being discharged appeared to be clear
	Disinfection System	In	Sodium hypochlorite (used all year to keep sand filters oxidized)
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	In	
	Dechlorination	In	Sodium bisulfate -- used all year long
Chlorine	In	Chlorine used for RAS to control filamentous growth as needed	