



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

Re: **Notice of Violation**
Sandusky County
Lindsey WWTP
NPDES Permit

October 25, 2012

Mayor and Council
Village of Lindsey
240 South Main Street
P.O. Box 364
Lindsey, Ohio 43442

Dear Mayor and Council:

On October 2, 2012, a Compliance Evaluation Inspection (CEI) was conducted at the Lindsey Wastewater Treatment Plant (WWTP). Present for the inspection were Rod Opelt and Tom Hill, Village Council, Jim Lipstraw, Village Maintenance, Tom Frey and Steve Shiets, Sandusky County Sanitary Engineers Office and Mary Beth Cohen 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. Observations, recommendations and items noted during the inspection are as follows:

1. A bar screen (manual clean) was in use prior to the influent lift station pumps. The originally installed comminutor was previously removed.
2. The surge tank was not in use at the time of inspection, and was almost empty. It was indicated that no aeration is provided to the surge tank as the air lines were removed years ago as they broke. This would indicate that the surge tank is not being operated as designed.
3. The bypass after the surge tank diverts excess flows around the aeration/clarification tanks, directly to the dosing tank and then to surface sand filters and disinfection. It was indicated that there is no meter to record this bypass and that the reported flow is an estimated value.
4. The larger aeration tank was out of service for most of the summer due to dry weather conditions. Darr's Cleaning Inc. recently cleaned this tank. The two smaller tanks were in use at the time of inspection.
5. The four surface sand filters were fairly clean, with some weed growth present and slight amount of solids in some of the beds. The southeast filter was in use at the time of inspection.

6. It was indicated that additional filter sand was added to replenish the sand filter beds in August 2011.
7. The flow meter to measure final effluent discharge is located after disinfection. There is no record of when the flow meter was last calibrated. The flow meter needs to be calibrated as per manufacturers' recommendations.
8. Ultraviolet (UV) disinfection was in use.
9. Two new sludge pumps have been purchased since our last inspection. The sludge pump in the lift station to the sludge drying beds has been replaced and a second backup pump is available on site.
10. The large accumulation of stockpiled dried sludge on the south sludge drying bed remains. The north sludge bed was in use and nearly full. Due to the accumulation and stockpile of dried sludge, there is very limited to no available use of the sludge drying beds. The sludge should be disposed of properly, as soon as possible. It was indicated that *Mid Ohio Sludge Management Inc.*, has been contracted for sludge removal, which is to be removed yet this fall. Please contact Andrew Gall of this office at (419-373-3003) with any questions regarding the disposal of sludge.
11. It is noted that an operator log book (clipboard) is being maintained at the Lindsey WWTP.
12. DMR reports indicate that the design flow of 0.215 mgd was exceeded 48 times in 2011 and 8 times so far this year (thru Sept 2012). The highest flows for these two years are 0.906 mgd and 0.911 mgd.
13. The Inflow and infiltration (I/I) flows were to have been addressed as per the NPDES permit Part I. C – Schedule of Compliance. As of this time, compliance schedule items that were to have been submitted, have not yet been received, other than an annual summary.
14. Discharge monitoring reports (DMRs) indicate that the lift station structure was observed to have bypassed three times in 2011 and two times so far this year (thru Sept 2012). It is noted that there is no physical method, other than that of an operator's visual observation while at the lift station during an overflow, to substantiate the frequency of overflows at this location. As per NPDES permit Part I. C – Schedule of Compliance, Item 2. *Municipal Separate Sewer Sanitary Sewer Compliance Schedule*, this overflow was to have been eliminated.
15. Pictures taken at the time of the inspection are enclosed.

E-DMR – NOV

A review of your DMRs has been conducted. A list of permit violations (05/2011 thru 09/2012) is enclosed.

NPDES Permit Compliance Schedule

The NPDES permit for this facility included the following compliance schedule items that were to have been submitted but not yet received:

6/1/2007 – Eliminate all separate sewer (pump station) overflows.

4/1/2008 - *Inflow and infiltration (I/I) Reduction Plan*, to include a fixed date schedule for completing the recommendations (with list of specified items included). The plan was to include a schedule of work necessary for the reduction of I/I into the collection system necessary to reduce peak wet weather flows, to be completed in five years (4/1/2012).

The Village of Lindsey provided documentation to this office that the influent overflow discharge pipe had been physically obstructed and that the overflows at the WWTP lift station were eliminated in 2007. Although the structure has been filled in with rocks and blocked with steel barriers, high flows continue to overflow over the walls of the influent lift station structures. Since the issuance of the current NPDES permit (4/1/2007), there have been 15 reported (observed) SSO's.

As evident by the high flows and continued treatment plant bypasses, efforts are still needed to address the I/I received at this facility. **At this time, we have not received the submittal of the required items listed in the NPDES Permit Part I, C - Schedule of Compliance** (pages 13 & 14 enclosed).

No apparent progress is being made to eliminate the compliance schedule violations; therefore, we have no choice but to recommend that the Director pursue enforcement action to achieve compliance.

Please inform this office in writing, within 10 days, as to the reasons for the above referenced violations and a description of the actions to be taken, along with submittal of a fixed date schedule addressing the above compliance schedule violations.

If there are any questions, please call Mary Beth Cohen at 419-373-3014.

Yours truly,



Elizabeth A. Wick, P.E.
Environmental Engineer/Unit Supervisor
Division of Surface Water

MBC/jlm

Enclosures

pc: Sandusky County Sanitary Engineers Office

ec: Tracking

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
<u>2PA00024</u>	<u>OH0022489</u>	<u>2012/10/02</u>	<u>C</u>	<u>S</u>	<u>1</u>

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Lindsey WWTP 139 West Dewey Street Lindsey, OH 43442	9:40 am	04/01/2007
	Exit Time	Permit Expiration Date
	1:00 pm	03/31/2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mr. Rod Opelt, Village Council	419-665-2311
Mr. Tom Hill, Village Council	419-665-2311
Mr. Jim Lipstraw, Village Maintenance	419-665-2311
Mr. Tom Fry, Operator of Record (ORC)	419-332-9967
Mr. Steve Shiets, Sandusky County Sanitary Engineer	419-332-9967

Name, Address and Title of Responsible Official	Phone Number
Mayor and Council Village of Lindsey 240 S. Main Street Lindsey, OH 43442	419-665-2311

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>M</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>M</u> Records/Reports	<u>N</u> Laboratory	<u>U</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>U</u> Sludge Storage/Disposal	<u> </u> Other
<u>M</u> Collection System		

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- NPDES permit schedule of compliance required submittals have not been received.
- The discharge of raw sewage overflowing the lift station structure during wet weather must be eliminated. The Village of Lindsey provided documentation to this office that the influent overflow discharge pipe had been physically obstructed and that the overflows at the WWTP lift station had been eliminated in 2007. Although discharge through the overflow channel and pipe have been physically blocked, the lift station structure continues to overflow onto the ground and discharge raw sewage to the stream.
- The south drying bed is stockpiled with dried sludge and the north bed was in use and full of sludge. There appeared to be very little available remaining capacity for sludge drying or storage. The stockpiled sludge needs to be properly disposed of as soon as possible.
- The final effluent flow meter needs to be calibrated as per manufacturers' recommendations.

_____ Name(s) and Signature(s) of Inspector(s)	 Date	_____ Ohio EPA, Northwest District Office
_____ Name and Signature of Reviewer	 Date	_____ Ohio EPA, Northwest District Office

Lindsey WWTP 2PA00024*HD

Limit Violations 5/2011 thru 9/2012

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2011	001	00300	Dissolved	1D Conc	6.0	5.9	7/25/2011
September 2011	001	00300	Dissolved	1D Conc	6.0	5.6	9/8/2011
September 2011	001	00300	Dissolved	1D Conc	6.0	5.4	9/9/2011
September 2011	001	00300	Dissolved	1D Conc	6.0	5.5	9/27/2011
September 2011	001	00300	Dissolved	1D Conc	6.0	5.7	9/28/2011
October 2011	001	31616	Fecal Coli	7D Conc	2000	10000.	10/8/2011
October 2011	001	31616	Fecal Coli	7D Conc	2000	10000.	10/15/2011
June 2012	001	00300	Dissolved	1D Conc	6.0	5.7	6/13/2012
July 2012	001	00530	Total Susp	7D Conc	18	24.	7/8/2012
July 2012	001	00300	Dissolved	1D Conc	6.0	5.6	7/13/2012
September 2012	001	00300	Dissolved	1D Conc	6.0	5.8	9/4/2012

Part I, C - Schedule of Compliance

Municipal Construction Schedule

1. Infiltration and Inflow Study Compliance Schedule

The entity shall take the actions described below as expeditiously as practicable, but not later than the dates developed in accordance with the following schedule:

A. The collection system receives excessive infiltration and inflow (I/I) which results in one or more of the following: collection system surcharging and overflows; hydraulic overloading of lift stations; sewage flows at the treatment plant that exceed the design peak flows and poor treatment plant performance. The permittee must take immediate steps to enact and enforce ordinances prohibiting discharge of clean water into the collection system and ensure that all new sewer construction meets Ohio EPA design standards. The permittee shall reduce the I/I, and achieve full compliance with all terms and conditions of the NPDES permit in accordance with the following schedule:

2. The permittee shall submit to the Northwest District Office for acceptance an I/I reduction plan. The I/I reduction plan submittal shall include a fixed date schedule for completing the recommendations. The I/I reduction plan shall be completed and submitted to Ohio EPA NWDO within 12 months from the effective date of this permit. The plan shall include, at a minimum, the following items: (Event Code 21599)

- a. A map indicating locations of all sanitary and storm sewers in the service area. Manholes and catch basins should be clearly marked.
- b. A description of the existing sanitary sewer system.
- c. A description of local geology and how it relates to I/I.
- d. A detailed historical summary of all I/I work (investigation and removal) that has been done to date.
- e. A plan for determining sources of excessive I/I including illegal connections. This should include flow and velocity monitoring at strategic points in the collection system.
- f. An implementation schedule for future I/I work, including televising sewer lines, dye or smoke testing, individual home inspections for sump pump connections, etc.

3. The permittee shall fully implement all the recommendations of the I/I reduction plan to reduce the volume of I/I entering the collection system.

4. All work necessary for the reduction of I/I into the collection system necessary to reduce peak wet weather flows at the treatment plant shall be fully completed according to the implementation schedule set forth in the I/I Reduction Plan, not to exceed 5 years from the effective date of this permit. (Event Code 4599)

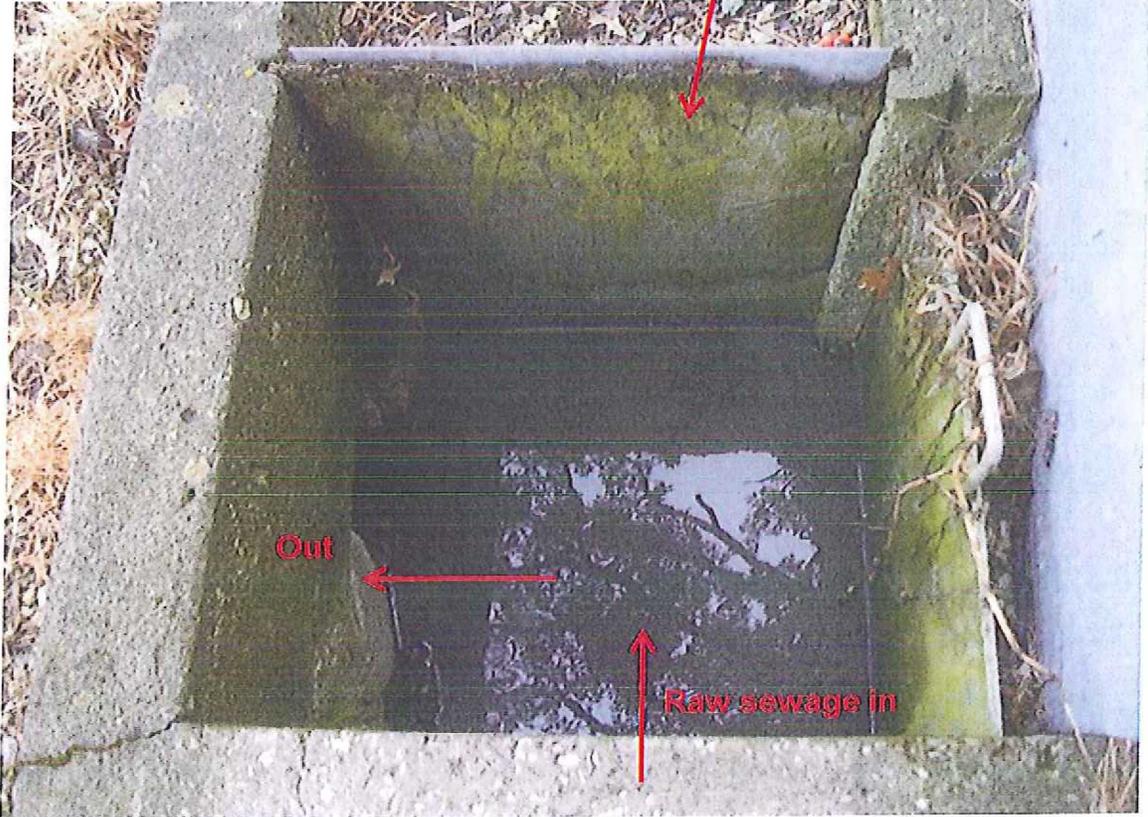
5. An annual report summarizing the results of the effort to reduce I/I into the collection system shall be submitted to the Ohio EPA NWDO no later than January 31, each year for the life of this permit.

2. Municipal Separate Sanitary Sewer Compliance Schedule

This entity shall take actions described below as soon as possible, but not later than the dates developed in accordance with the following schedule to eliminate all separate sewer overflows (unauthorized discharges):

A. Within 2 months of the effective date of this permit, The Village of Lindsey shall submit an update regarding the elimination of the pump station separate sanitary sewer overflow(s) (SSO). (Event Code 91099).

Plant influent structure



Plant influent structure (overflow 'pipe' physically blocked)



Influent structure – overflow erosion and debris at fence



Influent structure – overflow erosion and debris at fence



Influent structure – overflow erosion and debris at fence



Influent lift station / bypass bar screen in use (primary grinder out)



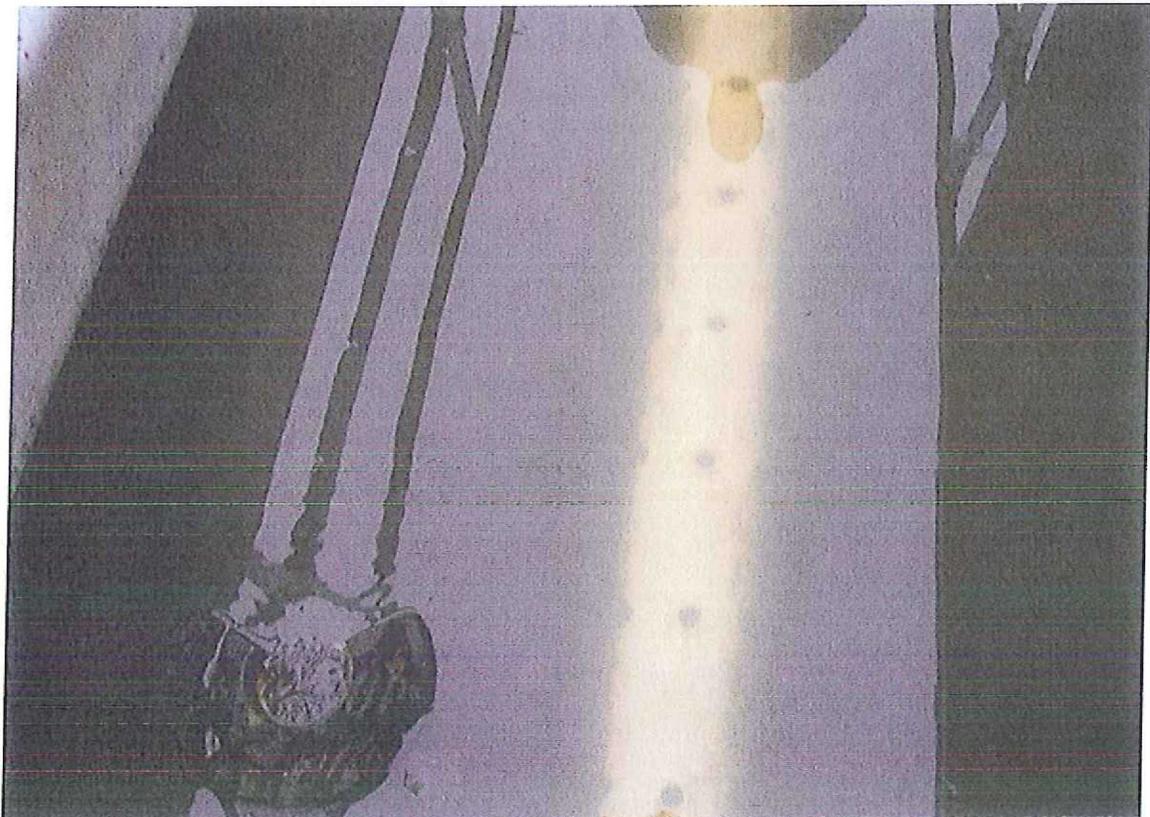
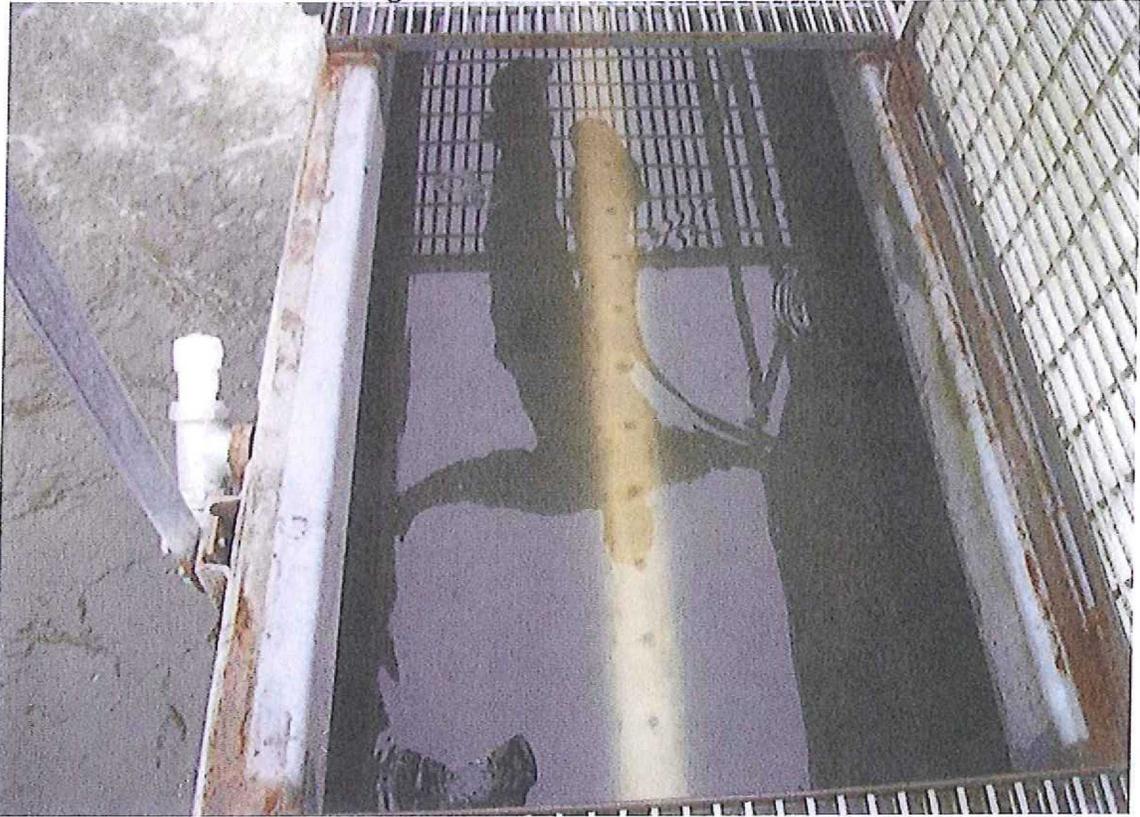
Influent lift station



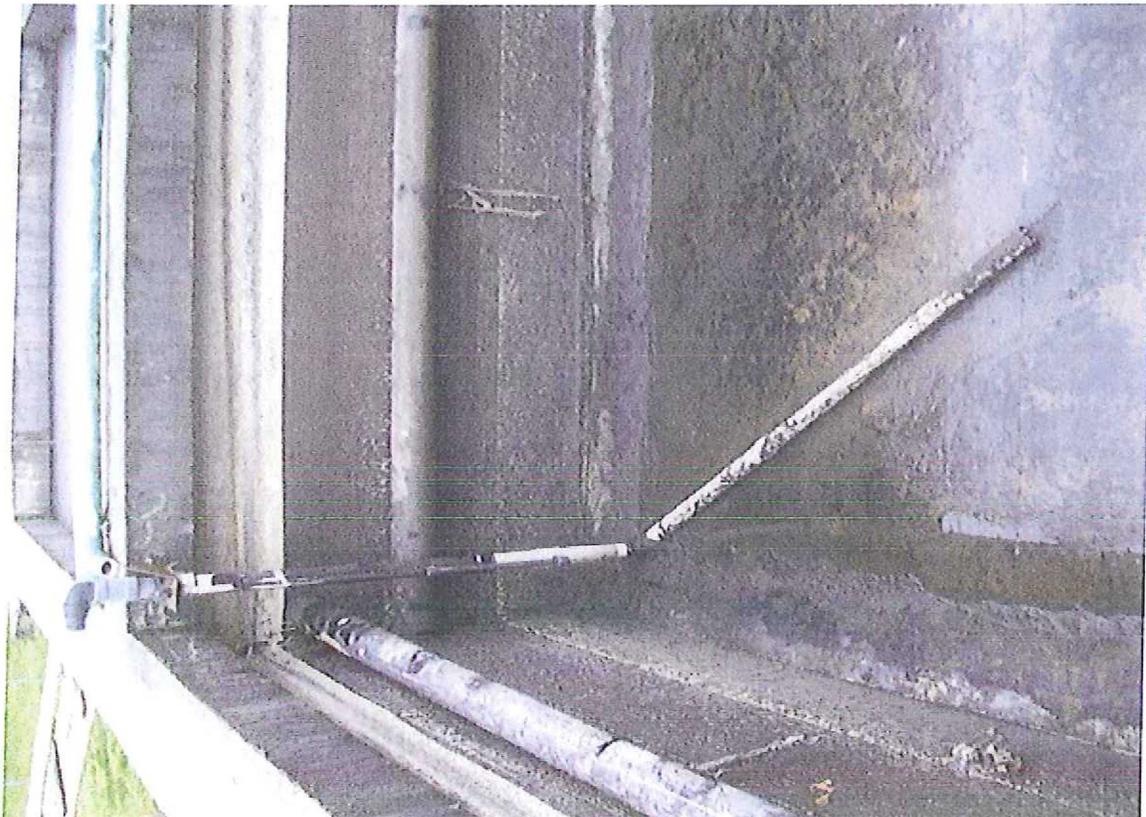
Surge Tank (aeration lines have been removed)



Integrated clarifier w/in aeration tank



100,000 gallon aeration tank (empty - not in use at this time)



100,000 gallon aeration tank (empty - not in use at this time)



100,000 gallon aeration tank (empty - not in use at this time)



clarifier effluent into tank before sand filters



Clarifier effluent discharge tank (overflow structure)



Sludge holding tank



tanks / lift station



Sludge drying beds - far bed has stockpiled sludge



Sand filters



UV Disinfection

