



**Environmental
Protection Agency**

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

Re: Erie County
Huron Basin WWTP
NPDES Permit

April 13, 2012

Mr. Jack Meyers, PE
Sanitary Engineer
Erie County Department of Environmental Services
P.O. Box 469
Huron, Ohio 44839

Dear Mr. Meyers:

On February 28, 2012, an NPDES permit compliance inspection was made at Huron Basin wastewater treatment plant. Mr. Chris McCarron, Superintendent, was present and provided information on plant operations. The inspection consisted of an interview utilizing a compliance checklist reviewing major areas of facility operations, and a walkthrough of the plant. In general, both operation and maintenance remain good, as a clear final effluent was observed being discharged. Our comments and recommendations are as follows:

- 1) Mr. McCarron noted increased costs of maintaining the primary sludge pumps. Currently, primary sludge is pumped to separate grinder pumps prior to the digester. The primary pumps are experiencing frequent and expensive repairs, and Mr. McCarron believes replacing the two stage pumping arrangement with dedicated primary sludge grinder pumps would be more cost effective in the long run. This alternative should be explored.
- 2) Discharge monitoring reports are being received in a timely manner and indicate full compliance with final effluent limits since our March 2011 inspection. We were disappointed that four SSO events were reported from four locations, and 23 water in basement (WIB) events were reported in Huron in 2011. SSO's are strictly prohibited and investigation should begin on how to best eliminate them. This will be closely monitored.
- 3) We received the 2011 annual report summarizing the mercury pollutant minimization program (PMP). Last year focused on dental practices, and they continue to be seen as contributing elevated levels of mercury. Erie County will continue to encourage the implementation of the American Dental Association BMP's for dental offices. Aluminum Sulfate (Alum) supplied to the plant has been analyzed and has shown highly variable concentration levels of mercury. This source will continue to be monitored. The Erie County Solid

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Waste Division conducted a very successful household waste collection event last year collecting an estimated 75 pounds of elemental mercury. Final effluent mercury continues to show a downward trend. Please continue to implement the mercury PMP as approved.

- 4) We received your work plan to reestablish a regular sewer cleaning schedule as required in the NPDES permit renewal. Approximately one-quarter of the sewers are scheduled to be cleaned on an annual basis. All lift stations are in the process of being outfitted with "real time" alarm monitors.
- 5) During my recent pretreatment inspection at Azko Nobel Paints, Mr. McCarron noted that discharges of surfactants twice led to foaming events at the Huron River outfall, and slug loads of concentrated inert solids discolored the settling tanks. This led to Azko Nobel developing and submitting a slug discharge control plan, which will hopefully address future incidents. Mr. McCarron also noted premature corrosion of the Sprowl Road lift station impeller, and requested Azko Nobel's IDP minimum pH limit be raised to 7.0 in their upcoming renewal. All parties agreed to this revision.
- 6) Once again Bob Sennish and Kelly Decker received the highest rating in the latest 2011 U.S. EPA laboratory quality assurance analysis program DMRQA #31.

Please find enclosed our completed inspection reports. If you have any questions, or if any of the above is incorrect, please email me at rick.zuzik@epa.state.oh.us or call me at (419) 373-3020.

Sincerely,



Richard A. Zuzik, MSE
Division of Surface Water

/jlm

Enclosure

pc: Chris McCarron, Superintendent
ec: Inspection Tracking

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Yr/Mo/Day	Inspection Type	Inspector	FacType
2PC00001	OH0020125	12/02/12	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected Huron Basin WWTP 554 River Road Huron, OH 44839	Entry Time 12:30PM	Permit Effective Date 7/1/11
	Exit Time 1:30PM	Permit Expiration Date 7/31/15

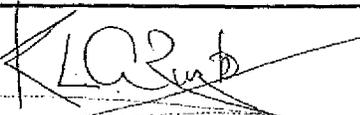
Name(s) and Title(s) of On-Site Representative(s) Chris McCarron Supt	Phone Number(s) 419 433 7303
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Name, Address and Title of Responsible Official Jack Meyers, PE Erie Co Sanitary Engineer P.O. Box 469 Huron, OH 44839	Phone Number 419 433 7303
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Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Compliance Schedules
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> Collection System		

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


Richard A. Zuzik, MSE Ohio EPA, Northwest
 Name(s) and Signature(s) of Inspector(s) Date District Office

Thomas Poffenbarger, P.E. Ohio EPA, Northwest
 Name and Signature of Reviewer Date District Office

Sections E thru K: Complete on all inspections as appropriate. N/A - Not Applicable N/E - Not Evaluated

Section E: Permit Verification				
	Yes	No	N/A	N/E
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<u>X</u>	___	___	___
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	<u>X</u>	___	___	___
(c) PRODUCT(S) AND PRODUCTION RATES CONFORM WITH PERMIT APPLICATION (INDUSTRIES)	___	___	<u>X</u>	___
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT	<u>X</u>	___	___	___
(e) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION/BRIEFING MEMO	<u>X</u>	___	___	___
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION	___	<u>X</u>	___	___
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES	___	___	<u>X</u>	___
(h) ALL DISCHARGES ARE PERMITTED	<u>X</u>	___	___	___
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT	<u>X</u>	___	___	___

COMMENTS/STATUS:

Renewed effective 7/1/11

Section F: Compliance Schedules/Violations				
	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE THE LAST INSPECTION	<u>X</u>	___	___	___
(b) PERMITTEE IS TAKING ACTIONS TO RESOLVE VIOLATIONS	<u>X</u>	___	___	___
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	___	<u>X</u>	___	___
(d) COMPLIANCE SCHEDULE CONTAINED IN _____	___	___	<u>X</u>	___
(e) PERMITTEE IS MEETING COMPLIANCE SCHEDULE	___	___	___	___

COMMENTS/STATUS:

4 SSO events in 2011

Section G: Operation and Maintenance

TREATMENT WORKS:

	Yes	No	N/A	N/E
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED				
(a) STANDBY POWER AVAILABLE GENERATOR <u>X</u> DUAL FEED <u> </u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(d) SUFFICIENT OPERATING STAFF PROVIDED # SHIFTS <u>1</u> DAYS/WEEK <u>7</u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS REQUIRED BY PERMIT CLASS: <u>III</u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(f) ROUTINE AND PREVENTIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
(h) OPERATION AND MAINTENANCE MANUAL PROVIDED AND MAINTAINED	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(j) REGULATORY AGENCY NOTIFIED OF BYPASSES <u> </u> ON MORS <u> </u> 800 NO.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECTION	<u> </u>	<u>X</u>	<u> </u>	<u> </u>

COLLECTION SYSTEM:

	Yes	No	N/A	N/E
(a) PERCENT COMBINED SYSTEM <u>0</u> %				
(b) ANY COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION (CSO <u> </u> SSO <u>X</u>)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(d) CSO O AND M PLAN PROVIDED AND IMPLEMENTED	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(g) LIFT STATION ALARM SYSTEMS PROVIDED AND MAINTAINED	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(h) ARE LIFT STATIONS EQUIPPED WITH PERMANENT STANDBY POWER OR EQUIVALENT	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(i) IS THERE AN INFLOW/INFILTRATION PROBLEM (SEPARATE SEWER SYSTEM) OR WERE THERE ANY MAJOR REPAIRS TO COLLECTION SYSTEM SINCE LAST INSPECTION	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(j) ANY COMPLAINTS RECEIVED SINCE LAST INSPECTION OF BASEMENT FLOODING	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	<u> </u>	<u>X</u>	<u> </u>	<u> </u>

COMMENTS/STATUS:

4 SSOs in 2011
 23 WIB events
 Digital "real time" monitoring being installed on all lift stations

Section H: Sludge Management

(a) SLUDGE MANAGEMENT PLAN (SMP)
SUBMITTED DATE _____ APPROVAL # _____ NOT SUBMITTED _____ N/A _____

	Yes	No	N/A	N/E
(b) SLUDGE MANAGEMENT PLAN CURRENT	<u>X</u>	_____	_____	_____
(c) SLUDGE ADEQUATELY DISPOSED (METHOD: <u>land applied</u>)	<u>X</u>	_____	_____	_____
(d) IF SLUDGE IS INCINERATED, WHERE IS ASH DISPOSED OF _____	_____	_____	_____	_____
(e) IS SLUDGE DISPOSAL CONTRACTED (NAME: <u>Mid Ohio</u>)	<u>X</u>	_____	_____	_____
(f) HAS AMOUNT OF SLUDGE GENERATED CHANGED SIGNIFICANTLY SINCE LAST INSPECTION	_____	<u>X</u>	_____	_____
(g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT	<u>X</u>	_____	_____	_____
(h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP	<u>X</u>	_____	_____	_____
(i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW	<u>X</u>	_____	_____	_____
(j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE	_____	<u>X</u>	_____	_____
(k) IS SLUDGE ADEQUATELY PROCESSED (DIGESTION, DEWATERING, PATHOGEN CONTROL)	<u>X</u>	_____	_____	_____

COMMENTS/STATUS:

Sludge occassionally hauled to Sandusky POTW when Mid Ohio can't take

Section I: Self-Monitoring Program

Part 1. Flow measurement

	Yes	No	N/A	N/E
(a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED & MAINTAINED <u>X</u>	<u>X</u>	_____	_____	_____
TYPE OF DEVICE: <u>X</u> ULTRASONIC & PARSHALL FLUME _____ ULTRASONIC & WEIR _____ WEIR _____ CALCULATED FROM INFLUENT <u>X</u> OTHER (Specify <u>Mag</u>)	_____	_____	_____	_____
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration <u>4/19/11</u>)	<u>X</u>	_____	_____	_____
(c) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED	<u>X</u>	_____	_____	_____
(d) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOWS	<u>X</u>	_____	_____	_____
(e) ACTUAL FLOW DISCHARGED IS MEASURED	<u>X</u>	_____	_____	_____
(f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY: <u>X</u> DAILY _____ WEEKLY _____ MONTHLY _____ OTHER	_____	_____	_____	_____

COMMENTS/STATUS:

Flow meter calibration due

Part 2. Sampling

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED BY PERMIT	<u>X</u>	___	___	___
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	<u>X</u>	___	___	___
(c) PERMITTEE USES REQUIRED SAMPLING METHOD	<u>X</u>	___	___	___
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE	<u>X</u>	___	___	___
(i) SAMPLES REFRIGERATED DURING COMPOSITING	<u>X</u>	___	___	___
(ii) PROPER PRESERVATION TECHNIQUES USED	<u>X</u>	___	___	___
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3	<u>X</u>	___	___	___
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records)	<u>X</u>	___	___	___
(f) ADEQUATE RECORDS MAINTAINED OF SAMPLING DATE, TIME, EXACT LOCATION, ETC	<u>X</u>	___	___	___

COMMENTS/STATUS:

Part 3. Laboratory

	Yes	No	N/A	N/E
GENERAL				
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)	<u>X</u>	___	___	___
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED	___	___	<u>X</u>	___
(c) ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT	<u>X</u>	___	___	___
(d) IF (c) IS YES, ARE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT	<u>X</u>	___	___	___
(e) COMMERCIAL LABORATORY USED	<u>X</u>	___	___	___
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB				
<u>Sludge, metals, O&G, nitrate-nitrite</u>				

(2) LAB NAME: Jones & Henry, Wright St - dioxin

QUALITY CONTROL/QUALITY ASSURANCE

(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED	___	___	___	___
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	___	___	___	___
(h) ADEQUATE RECORDS MAINTAINED	___	___	___	___
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM DATE : <u>7/11</u> <u>X</u> SATISFACTORY ___ MARGINAL ___ UNSATISFACTORY				

COMMENTS/STATUS:

DMRQA #31

Section J: Effluent/Receiving Water Observations

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
001	none	none	none	none	none	none	

COMMENTS/STATUS:

Section K: Multimedia Observations

	Yes	No	N/A	N/E
(a) ARE THERE INDICATIONS OF SLOPPY HOUSEKEEPING OR POOR MAINTENANCE IN WORK AND STORAGE AREAS OR LABORATORIES	___	<u>x</u>	___	___
(b) DO YOU NOTICE STAINING OR DISCOLORATION OF SOILS, PAVEMENT, OR FLOORS	___	<u>x</u>	___	___
(c) DO YOU NOTICE DISTRESSED (UNHEALTHY, DISCOLORED, DEAD) VEGETATION	___	<u>x</u>	___	___
(d) DO YOU SEE UNIDENTIFIED DARK SMOKE OR DUSTCLOUDS COMING FROM SOURCES OTHER THAN SMOKESTACKS	___	<u>x</u>	___	___
(e) DO YOU NOTICE ANY UNUSUAL ODORS OR STRONG CHEMICAL SMELLS	___	<u>x</u>	___	___
(f) DO YOU SEE ANY OPEN OR UNMARKED DRUMS, UNSECURED LIQUIDS, OR DAMAGED CONTAINMENT FACILITIES?	___	<u>x</u>	___	___

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:

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	
	Safety Features	S	
	Bypasses		
	Stormwater Overflows		
	Alternate Power Source	S	DIESEL GENERATOR
Preliminary	Maintenance of Collection Systems	M	SEWER CLEANING PROGRAM RENEWED, 4SSOs, 23 WIB
	Pump Station	IN	
	Ventilation	S	
	Bar Screen	IN	AUTOMATIC
	Disposal of Screenings	S	LANDFILL
	Comminutor		
	Grit Chamber	IN	AERATED
	Disposal of Grit	S	LANDFILL
Primary	Settling Tanks	IN	3 ROUND
	Scum Removal	S	
	Sludge Removal	S	FREQUENT PUMP MAINTENANCE COSTLY
	Effluent	S	NORMAL
Sludge Disposal	Digesters	IN	1 PRIMARY, 2 SECONDARY
	Temperature and pH	S	
	Gas Production	S	
	Heating Equipment	S	
	Sludge Pumps	IN	
	Drying Beds		
	Vacuum Filter		
	Disposal of Sludge	S	LAND APPLIED -- MID OHIO
Other	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	IN	ALUM FED AT GRIT CHAMBER AND PRIOR TO FINAL
Secondary- Tertiary <small>List items as</small>	RBCs	IN	15 TOTAL, 3 SETS, MOD GROWTH
	FINAL CLARIFIERS	IN	1 OUT FOR WINTER
			2 ROUND
Disinfection	Effluent	S	CLEAR
	Disinfection System	OUT	
	Effective Dosage	OUT	
	Contact Time		
	Contact Tank	IN	
	Dechlorination	OUT	SODIUM BISULFITE