Ohio EPA
40 years and moving forward

Re: Crawford County
City of Crestline WWTP
NPDES Permit

January 16, 2013

Mr. Marc Milliron
Safety-Service Director
City of Crestline
100 North Seltzer Street
Crestline, Ohio 44827

Dear Mr. Milliron:

On November 28, 2012, an inspection of the City of Crestline Wastewater Treatment Plant (WWTP) was conducted. Ohio EPA representatives Ms. Michelle Sharp and Ms. Peggy Christie met with Mr. Mike Ritter. The inspection included a tour of the facility and completion of a checklist designed to evaluate the major areas of the treatment plant. Our inspection findings and recommendations are summarized below.

The mixed liquor in the counter current aeration tank was a healthy brown color. There were some solids on the surface of the clarifiers, but they had a clear effluent. The effluent from the UV disinfection tank was clear.

Our review of the discharge monitoring reports (DMRs) covering the months of November 2011 through November 2012 for the Crestline WWTP found violations of the National Pollutant Discharge Elimination System (NPDES) permit effluent limitations. The specific instances of non-compliance are enclosed. The facility remains on the significant non-compliance (SNC) list for its phosphorous violations.

The facility's NPDES permit renewal should be completed soon and you should review it carefully as there is a 30 day comment period. Our completed inspection forms are enclosed for your review. If you have any questions, please contact Michelle Sharp at 419-373-3019.

Yours truly,

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

MS/jlm
Enclosures
pc: Mike Ritter, Crestline WWTP
ec: 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**
2PC00006	OH0020664	22/28/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
City of Crestline WWTP 100 Westgate Drive Crestline, Ohio 44827	1:15 PM	8/1/2004
	Exit Time	**Permit Expiration Date**
	3:00 PM	7/31/2009
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Mr. Mike Ritter	419-683-2836	
Name, Address and Title of Responsible Official	**Phone Number**	
Mayor and Council City of Crestline 100 North Seltzer Street Crestline, Ohio 44827	419-683-3800	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	M	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
U	Collection System				

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

Inspector	Reviewer
Michelle Sharp 1/15/13	Thomas Poffenbarger 1/15/13
Michelle Sharp Date Environmental Specialist II Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E. Date Water Quality Engineer Division of Surface Water Northwest District Office

Permit # :
NPDES #:

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.....	N
(g) Notification given to State of new, different or increased discharges.....	N/A
(h) All discharges are permitted.....	N
(i) Number and location of discharge points are as described in permit.....	N

Comments/Status:

(h & i) The City has recently discovered an additional 3overflows within the collection system. So they now have a total of 10 overflows in the system.

Section F: Compliance

(a) Any significant violations since the last inspection.....	Y
(b) Permittee is taking actions to resolve violations.....	Y
(c) Permittee has a compliance schedule.....	Y
(d) Compliance schedule contained in	NPDES Permit
(e) Permittee is meeting compliance schedule.....	N

Comments/Status:

(a/b) Phosphorous violations continue. Plant is feeding 300 lb of alum/day to try and bring down phosphorous levels. The next step will be to do an evaluation of the sewer system to determine where the phosphorous may be coming from in the system.

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..... Class: IV	Y
(f)	Copy of certificate of Operator of Record displayed on-site.....	Y
(g)	Minimum operator staffing requirements fulfilled (OAC 3745-7)...	N/A
(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..... On MORs ☐ and/or Spill Hotline (1-800-282-9378) ☐	N/A
(m)	Any hydraulic and/or organic overloads since last inspection.....	Y

Record Keeping:

(a)	Log book provided.....	Y
(b)	Format of log book (i.e. computer log, hard bound book) Binder and time cards	
(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.....	N/A
	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)...	N/A
	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: 0%	
(b)	Any collection system overflows since last inspection..... (CSO ☐ and/or SSO ☒)	Y
(c)	Regulatory agency notified of overflows (SSOs).....	Y
(d)	CSO O&M plan provided and implemented.....	N/A
(e)	CSOs monitored and reported in accordance with permit.....	N/A
(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.....	Y

Comments/Status:

Permit # :
NPDES #:

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..... N
(Name:)
(f) Has amount of sludge generated changed significantly since last inspection..... Y
(g) Adequate sludge storage provided at plant.....N
(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)..... Y

Comments/Status:

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 ..... N
(Date of last calibration:)
(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:

(b) Due to the design the meter cannot be calibrated because it can't be bypassed.

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
(see GLC page 5 and 8)
(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) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite? Y

(b) Do SOP's include the following if applicable:

- Title
- Scope and Application
- Summary
- Sample Handling and Preservation
- Interferences
- Apparatus and Materials
- Reagents
- Procedure
- Calculations
- Quality Control
- Maintenance
- Corrective Action
- Reference (Parent Method)

Note: SOP's are required per Standard Methods 1020A and states "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."

(c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). 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. Y
(f) If (e) is yes, are results in permittee's self-monitoring report..... Y

Quality Control/Quality Assurance

(g) Quality assurance manual provided and maintained..... Y
(h) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page 7)
(i) Results of latest USEPA quality assurance performance sampling program: ☒ Satisfactory ☐ Marginal ☐ Unsatisfactory

Permit # :
NPDES #:

Date:

(j) Commercial laboratory used..... Y
Parameters analyzed by commercial lab:

Lab name:

Comments/Status:

Alloway: Everything but DO and pH
Enviroscience: Bioassay
Plant: pH and DO

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Not Observed	No	No	No	No	No	Clear	

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?

Permit # :
NPDES #:

Comments/Status:

Form Approved
OMB No. 158-R0035

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	OUT	
	Stormwater Overflows		
	Alternate Power Source	OUT	Generator not running
Preliminary	Maintenance of Collection Systems	U	
	Pump Station	IN	
	Ventilation	S	
	Bar Screen	IN	
	Disposal of Screenings	S	Landfill
	Comminutor		
	Grit Chamber	IN	Aerated
	Disposal of Grit	S	Landfill
Primary	Settling Tanks		
	Scum Removal		
	Sludge Removal		
	Effluent		
Sludge Disposal	Digesters	OUT	
	Temperature and pH		
	Gas Production		
	Heating Equipment		
	Sludge Pumps		
	Disposal of Sludge	S	Landfill
	Sludge Holding Tank	IN	
	Sludge Thickener		
	Belt Filter Press	OUT	
Other	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	S	
Secondary-Tertiary List items as	Countercurrent Aeration Tank	IN	
	Blowers	IN	Operate between a DO of 0.5 and 1.5
	Secondary Clarifiers	IN	2 units, some solids floating but clear
Disinfection	Effluent	S	Clear
	Disinfection System	OUT	UV
	Effective Dosage		
	Contact Time		
	Contact Tank		
	Dechlorination		

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
11/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.152
11/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.57062
11/8/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.57
11/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	7.70221
12/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.8492
12/5/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.9
12/8/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	5.66347
12/15/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.72233
12/21/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.7
12/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	7.22382
1/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.0275
1/1/2012	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.02099
1/8/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.1862
1/15/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	5.49653
2/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.215
2/1/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.8
2/1/2012	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.42278
2/1/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	9.76916
2/29/2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.5
3/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.098
3/1/2012	001	00665	Phosphorus, Total (P)	30D Qty	3.6	4.70648
3/1/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	5.52098
3/1/2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.4
3/22/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.6
3/22/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	7.39862
4/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.58
4/8/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.7
4/15/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.64
4/22/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.81
5/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.3675
5/1/2012	001	00665	Phosphorus, Total (P)	30D Qty	3.6	3.68399
5/22/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.87
6/1/2012	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.2	1.92333
6/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	2.27
6/1/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.46
6/8/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.32
6/15/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.13
6/22/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.17
6/24/2012	001	61426	Chronic Toxicity, Ceri	1D Conc	1.7	3.
7/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.615
7/1/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.12
7/8/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.79
8/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.664
8/8/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.66
8/15/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.92
8/22/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.81
9/1/2012	001	00610	Nitrogen, Ammonia (NH3	30D Conc	0.8	2.1375
9/1/2012	001	00610	Nitrogen, Ammonia (NH3	30D Qty	2.9	3.58359
9/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.81
9/1/2012	001	00665	Phosphorus, Total (P)	30D Qty	3.6	4.63175
9/8/2012	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.2	8.46667
9/8/2012	001	00610	Nitrogen, Ammonia (NH3	7D Qty	4.3	14.11
9/8/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	3.88
9/8/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.46616
9/22/2012	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.86823
10/1/2012	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.24
10/8/2012	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.65
10/29/2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.5
10/30/2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6