



January 15, 2012

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CERTIFIED MAIL

Mayor and Council
 City of Sandusky
 222 Meigs Street
 Sandusky, OH 44870

Sandusky WPC
 2PF00001*ND

Re: Notice of Violation - Nine Minimum Control Implementation/Collection System Inspection

Dear Mayor and Council:

On November 6, 2012, Ohio Environmental Protection Agency (EPA) staff members Megan Zale, Rick Zuzik and I met with Todd Roth, Jeff Meinert, Todd Gibson and Scott Grover of the City of Sandusky (City) to conduct an inspection of the wastewater treatment plant (WWTP) and collection system. This letter focuses on the compliance evaluation conducted on the combined sewer overflows (CSOs), sanitary sewer overflows (SSOs), the degree of implementation of the nine minimum controls (NMCs) for reducing CSOs and the status of the Long-Term Control Plan (LTCP). The City is in violation of the National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 2PF00001*ND) for failure to prohibit and properly report SSOs.

The current City of Sandusky NPDES permit identifies fifteen (15) CSOs discharging to the Sandusky Bay, Mill Creek and Pipe Creek. No sanitary flows, sanitary debris, or odors were observed at the outfalls during the inspection. The City indicated that CSO outfall 2PF00001018 had been eliminated at Tiffin Street. CSO outfall numbers on the City maps at the WWTP were different from the permitted outfall numbers listed in the NPDES permit. This discrepancy should be corrected. The City reported it plans to purchase a hand held GPS unit to upgrade current AutoCAD maps to GIS maps. Details regarding the City's efforts and additional measures the City should implement are outlined in the City of Sandusky Nine Minimum Controls Compliance Inspection Summary enclosed in Attachment A.

Discussion during the inspection, review of records, and review of information submitted to this office indicates that the City of Sandusky is in violation of the NPDES Permit for the following:

- Failure to prohibit SSOs in accordance with Part 1, B and Part II, Items F and G.
- Failure to properly report SSOs on the Monthly Operating Report (MOR)+ in accordance with Part 1, B and Part II, Item F.
- Failure to submit a SSO annual report in accordance with Part II, Item F.

Please provide a response to these violations that addresses how future violations of NPDES Parts I, B and Part II, Item F and G will be avoided. Also, please submit to Ohio EPA SSO occurrence data in accordance with NPDES permit requirements for the period beginning January 1, 2008 through December 31, 2012. This includes amending data reported to the MOR (Discharge Monitoring Report [DMR]) and submitting the retrospective annual reports. Please be advised that if these violations of

the City of Sandusky reporting requirements continue to occur, and if satisfactory progress is not made, escalated enforcement will be recommended to achieve compliance.

The NMCs were evaluated during the inspection and are included in Part II, Item E of your current NPDES permit. In order to evaluate the degree of implementation of control of solid and floatable materials in CSOs (NMC-6), please prepare and submit to Ohio EPA within 30 days documentation outlining the current procedure for controlling and monitoring floatables at the CSO outfalls during activation events. The current public notification system (NMC-8) will be discussed during the upcoming meeting later this month. Additional information on the City's efforts towards implementing the NMCs can be found in Attachment A.

The status of the City's LTCP was also discussed during the inspection. The City continues to implement the CSO control requirements addressed in a February 1995 Consent Order that was amended in December 1997: State of Ohio vs. City of Sandusky, Case No. 95-CV-053. Portions of the interceptor are not adequately sized and the City is proposing an upgrade. Ohio EPA received the General Plan Revisions submitted by the City of Sandusky in December 2012 and will discuss the revisions at the upcoming meeting later this month.

If you have questions/concerns regarding this letter, I can be reached by telephone at (614) 644-2039 or email at caitlin.ruza@epa.state.oh.us.

Sincerely,



Caitlin Ruza
Environmental Engineer
Ohio EPA, Division of Surface Water, Central Office

Encl: Attachment A: City of Sandusky Nine Minimum Controls Compliance Inspection Summary

cc: Jeff Meinert, Superintendent
Megan Zale, DSW-CO
Rick Zuzik, DSW-NWDO
DSW-CO – File

Attachment A
City of Sandusky Nine Minimum Controls Compliance Inspection Summary

Part II – Other Requirements Item E, in the permittee's NPDES permit (Ohio EPA No. 2PF00001*ND), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls (NMCs). Part II.B. of the National Combined Sewer Overflow (CSO) Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

1. Proper operation & regular maintenance programs for the sewer system and CSOs.

City of Sandusky staff operates and maintains the wastewater treatment plant (WWTP) and collection system. The City indicated an approved Operation & Maintenance (O&M) Manual is being implemented that is effective in reducing sewer line and lift station problems. **The O&M Manual should continue to be periodically reviewed to reflect modifications to the structure, operation and maintenance of the collection system especially as system upgrade projects are implemented.**

An electronic logbook is being kept to document maintenance and repair on the sewer system and CSO structures. Routine cleaning and maintenance are being implemented which has resulted in a reduction of issues with the system. The City has conducted dye testing, smoke testing, and televising in the collection system as needed.

2. Maximum use of the collection system for storage.

The City indicated that flow monitoring is being utilized as part of an ongoing study to evaluate the CSO regulators and the collection system. The original regulator plates have been removed from several of the CSOs and replaced with a higher modified weir (brick wall). The current modified weir heights were determined based on trial and error to prevent basement backups. The regulators are checked weekly. CSO outfall flap gates installed to prevent surface water intrusion are also inspected once per week. The City conducts regularly scheduled and complaint response cleaning of the collection system to remove buildups of sediment and debris, and prevents buildups by implementing seasonal leaf collection and street sweeping.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.

The permittee implements an approved pretreatment program for the system's industrial users. The pretreatment program was not evaluated at the time of the inspection, but the City indicated that pretreatment requirements are reviewed and modified to assure CSO impacts are minimized.

4. Maximize flow at the WWTP for treatment.

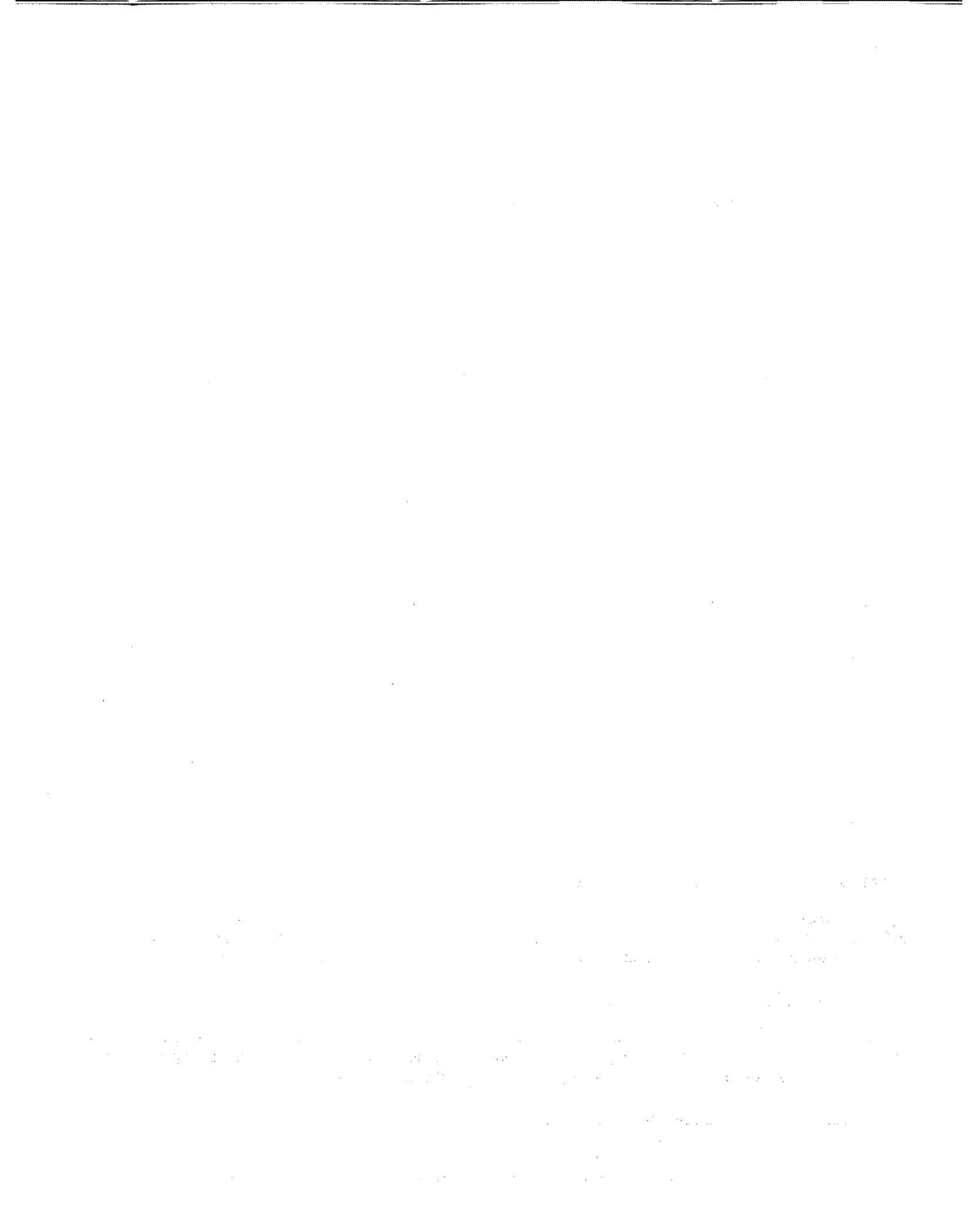
City staff indicated that the average daily design flow for the WWTP (an activated sludge aeration facility) is 15.7 million gallons per day (MGD) with a wet weather peak capacity of 42 MGD. WWTP staff operates the WWTP to treat as much flow as possible and has raised several CSO regulators in the system.

5. Prohibition of CSOs during dry weather.

The permittee indicated they are inspecting CSOs at a minimum of once per week. No dry weather overflows (DWOs) were reported over the past year. DWO discharges have always been prohibited by the NPDES program. Such discharges can create serious public health and water quality problems.

6. Control of solid and floatable materials in CSOs.

The city conducts seasonal street cleaning and leaf collection as a pollution prevention measure. A concrete trench was constructed to control solids and floatable materials at one of the CSO outfalls. Other CSO outfalls



do not have solids and floatables control in place. **Please prepare and submit to Ohio EPA documentation outlining the current procedure for controlling and monitoring floatables at the CSO outfalls during activation events.**

7. Pollution prevention.

The permittee conducts regularly scheduled seasonal street sweeping and leaf collection.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.

The City had signage posted at all of the observed CSO outfalls. The City includes information about CSO outfall locations and possible impacts in the local newspaper during the recreational season. The City should include CSO-related information (such as outfall location, health concerns, construction project specifics and contact information where additional details can be obtained) with sewer bills and on the City website. This added effort should increase public awareness regarding CSO issues and LTCP projects. **The current public notification plan will be addressed during the upcoming meeting later this month.**

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

The City is continuing to monitor its CSOs according to requirements contained in its NPDES permit. Summaries of overflow characteristics are reported to Ohio EPA monthly. The City indicated records are kept for discharge frequency, volume, and pollutant characterization for each CSO location.

