



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

Re: **Notice of Violation**
Seneca County
Fostoria WWTP
NPDES Permit 2PD00031
Compliance Evaluation Inspection

February 1, 2013

Mayor & Council
City of Fostoria
213 South Main Street
Fostoria, Ohio 44830

Dear Mayor & Council:

On November 9, 2012, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Fostoria Wastewater Treatment Plant (WWTP). Mr. Lon (Mickey) Shank, Superintendent, was present and provided information on plant operations.

All major treatment units were in operation during the inspection. The following items were noted:

- Mr. Lon M. Shank, Fostoria WWTP Superintendent, recently received his Class IV Certified Wastewater Operator License. Mr. Shank is to be commended for his accomplishment.
- A lab audit was conducted on July 18, 2012, by Vandana Deshmukh, Quality Assurance Officer, Ohio EPA- Division of Environmental Services. In an effort to comply with the recommendations of the audit, in-house training was being scheduled, to be provided by Alloway.
- The Honeywell International Inc. facility, located at 1600 North Union Street, Fostoria, has been issued a permit to install (PTI) and NPDES discharge permit for groundwater remediation. When this system becomes operational, it is estimated that up to 158,400 gpd will be diverted out of the sewerage system. In addition to reduced flows at the WWTP, combined sewer overflows (CSO's) at the Thomas Street structure (004) are also anticipated to be reduced.

Mayor and Council
February 1, 2013
Page Two

Previously, weirs had been fabricated and attached to the Thomas Street CSO structure. It was indicated that since this addition, the onset of discharge from the CSO events is postponed and volume of overflow is noticeably reduced. The operating height of the weir has recently been adjusted by adding an additional board (3rd board for a total of 18 inches). This should further minimize the CSO discharge.

Discharge Monitoring Reports (DMRs) / Notice of Violation (NOV)

A compliance review of your discharge monitoring reports (DMRs) was conducted. A list of permit violations (November 2011 through December 2012) is enclosed.

Review of your self-monitoring reports for the six month period ending in September 2012 indicates that you were in significant non-compliance (SNC) with the Nitrogen, Ammonia (NH₃) effluent limitation contained in your NPDES permit. A facility becomes SNC when it exceeds the effluent limit for four or more months in two consecutive quarters or exceeds the effluent limit significantly in any two months in two consecutive quarters. As of this time, it appears that the WWTP has since returned to compliance.

Our completed inspection report forms are enclosed for your review. If there are any questions, please call Mary Beth Cohen at 419-373-3014.

Yours truly,



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

MBC/jlm

Enclosures

pc: Lon M. Shank, Superintendent
Stephen M. Jann, U.S. EPA, Region V
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
2PD00031	OH0052744	11/09/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Fostoria Wastewater Treatment Plant 1301 Perrysburg Road Fostoria, Ohio 44830-1007	9:00 a.m.	May 1, 2010
	Exit Time	Permit Expiration Date
	1:00 p.m.	April 30, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Lon M. Shank, Superintendent	419-435-3263	
Name, Address and Title of Responsible Official	Phone Number	
Mayor & Council 213 S. Main Street Fostoria, Ohio 44830	419-435-4132	

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

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

A lab audit was conducted on July 18, 2012, by Vandana Deshmukh, Quality Assurance Officer Ohio EPA- Division of Environmental Services.

Honeywell International Inc. has been issued a permit to install (PTI) and NPDES discharge permit for groundwater remediation. When this system becomes operational, it is estimated that up to 158,400 gpd will be diverted from the sewerage system. In addition to reduced flows at the WWTP, CSO's at the Thomas Street structure (004) should be further reduce.

The WWTP staff operates 2 shifts/day, 1 shift/weekend day and storm event coverage as needed.

Inspector		Reviewer	
	1/30/13		1/30/13
Mary Beth Cohen Division of Surface Water Northwest District Office	Date	Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office	Date

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)..... | Y |
| (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..... | Y |
| (i) Number and location of discharge points are as described in permit..... | Y |

Comments/Status:

WWTP design flow @ 8.25 MGD with treatment of up to 12 MGD during rain events.

Average flows are 4.0 MGD. Average dry weather flows were 2.5 during the dry summer months.

Section F: 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) Compliance schedule contained in | <i>NPDES Permit & Consent Decree</i> |
| (e) Permittee is meeting compliance schedule..... | N |

Comments/Status:

Both the NPDES Permit and Consent Decree include compliance Schedules.

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)..... IV
- (e) Operator of Record holds unexpired license of class required by permit - Required Class: IV..... Y
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/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..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Comments/Status:

The single degritter pump was down for a week when the sump stopped working, causing the pit to flood and motor to burn up. An alarm system has been added to this pump for improved operations.

The bar screen motor was also down for a week. The backup bar screen was used during this time.

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book: Computer log and hard bound book
- (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)... Y
 - V. Identification of person making log entries..... Y
- (e) 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: ~ 65 %
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... Y
- (e) CSOs monitored and reported in accordance with permit..... Y
- (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:

Sunny Farms Landfill is required to stop discharging from their leachate collection system to the sanitary sewer during CSO events. Onsite equalization/storage tanks are used to retain the leachate during these times.

An odor complaint was noted when the odor control unit at the booster pump on the line from New Riegel was not functioning.

There have been no reports of basement flooding since 2011.

The WWTP staff operates 2 shifts/day, 1 shift/weekend day. Additionally coverage is provided during storm events and high flow.

It was indicated that 100% of the sewer system has been cleaned.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Approved: Yes 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
- (f) Has amount of sludge generated changed significantly since
last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (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:

Filter press sludge is collected in a dump truck, and hauled to the landfill for disposal by WWTP staff. Sludge volume is reported to be stable at this time.

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 Y
(Date of last calibration: 11/8/12)
- (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:

The required flow proportioned composite sampling is in use.
The flow meter was calibrated on November 8, 2012, by ADS.

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/E
- (e) Analyses being performed more frequently than required by permit. N/E
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/E

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. N/E
 (see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
 Date: Study #32- 2012

- (j) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab:
Toxicity, priority pollutants and sludge analysis

Lab name: *Alloway*

Comments/Status:

- *A lab audit was conducted on July 18, 2012, by Vandana Deshmukh, Quality Assurance Officer Ohio EPA- Division of Environmental Services.*
- *In an effort to comply with the lab audit, in house training was being scheduled to be conducted by Alloway. At the time of inspection, three WWTP employees were scheduled for three days of in house lab training, with additional training to follow.*

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001		None	None	None	None	None	None	

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?

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	-	
	Storm water Overflows	Out	
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	S	Class II Collection / sewerage system (OAC 3745-7-04)
	Pump Station	In	
	Ventilation	S	
	Bar Screen	In	Automatic bar screen with manual back up (high flows have caused overflows)
	Disposal of Screenings	S	Landfill
	Comminutor	-	
	Grit Chamber	In	Manual or automatic (run manually while accepting POTW sludge)
	Degritter	In	
	Disposal of Grit	S	Landfill
	Equalization Lagoon	In	Lined E.Q. basin - Was empty and clean at the time of inspection
Primary	Settling Tanks	In	Three operating (each taken down and cleaned yearly)
	Scum Removal	In	
	Sludge Removal	In	
	Effluent	S	
	Screw Pumps	In	One of two operating (rotated weekly)
Sludge Disposal	Digesters	In	Digester liner removed and replaced fall of 2010
	Temperature and pH	-	
	Gas Production	-	
	Heating Equipment	-	
	Sludge Pumps	In	Two sludge pumps / one operating
	Sludge Storage	In	No liquid storage available. Building provided for storage after belt press.
	Disposal of Sludge	S	Landfill (City staff are hauling dried solids to the landfill / not using contractor)
	Belt press with Polymer addition	Out	Not in use at time of inspection - Typically run 1 days per week (16 hr/day) Sludge is collected directly in the dump truck used to haul to landfill
Other	Flow Meter and Recorder	In	New flow meter (permit requires flow proportioned samples)
	Records	S	
	Lab Controls	S	
	Chemical Treatment	In	Alum added to return sludge wet well for phosphorus control Alum pump recently replaced
Secondary Tertiary	Trickling Filters (arms removed)	In	Two - both in use as roughing filters (not able to bypass units)
	Aeration Tanks	In	Four tanks - all in use
	Final Settling Tanks	In	Six shallow tanks, all in use. Spray on liner added 4/08 for the control of algae. Algae growth on the weirs continues to be a problem.
Disinfection	Effluent	S	The discharge appeared clear
	Disinfection System	In	Ultraviolet disinfection
	Effective Dosage	-	
	Contact Time	-	
	Contact Tank	-	

Fostoria WWTP 2PD00031
Final Effluent Violations 11/1/2011 thru 12/31/2012

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2012	001	00530	Total Suspended Solids	30D Conc	12.0	14.5	1/1/2012
January 2012	001	00530	Total Suspended Solids	30D Qty	375	389.212	1/1/2012
January 2012	001	00530	Total Suspended Solids	7D Conc	18.0	20.6666	1/15/2012
January 2012	001	00530	Total Suspended Solids	7D Qty	563	680.651	1/15/2012
February 2012	001	00530	Total Suspended Solids	30D Conc	12.0	13.25	2/1/2012
April 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.8	3.645	4/1/2012
April 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.2	9.71667	4/22/2012
April 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	131.4	144.765	4/22/2012
May 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.8	3.6225	5/1/2012
May 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.2	8.63667	5/1/2012
June 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.57667	6/1/2012
June 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.3	3.98333	6/1/2012
June 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.3	3.75667	6/22/2012
June 2012	001	61941	pH, Maximum	1D Conc	9.0	9.1	6/28/2012
July 2012	001	61942	pH, Minimum	1D Conc	6.5	6.4	7/5/2012
August 2012	001	00300	Dissolved Oxygen	1D Conc	7.0	6.6	8/14/2012
August 2012	001	00300	Dissolved Oxygen	1D Conc	7.0	6.1	8/27/2012
October 2012	001	61942	pH, Minimum	1D Conc	6.5	6.4	10/2/2012
October 2012	001	61942	pH, Minimum	1D Conc	6.5	6.4	10/5/2012