



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

Re: Huron County
City of Bellevue WWTP
NPDES Permit
2PD00037

March 6, 2013

Mr. Jeffrey Crosby
Safety Service Director
City of Bellevue
3000 Seneca Industrial Parkway
Bellevue, Ohio 44811

Dear Mr. Crosby:

On January 2, 2013, Andrew Gall conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection of the wastewater treatment plant (WWTP) serving the City of Bellevue. Mr. Eric MacMichael, Superintendent, was present and provided information on plant operations and maintenance. At the time of the visit, all of the treatment units were in operation and a clear final effluent was being discharged to Snyder's Ditch. No samples were taken to verify compliance with permit limits.

Mr. MacMichael indicated that the new UV disinfection system should be delivered and ready to install in late March 2013. This will give the City the month of April to start up the system to be able to meet E.coli limits when they take effect on May 1. An effluent flow meter will also be installed so that the operation of the UV system will be based on the amount of flow the plant is treating. He is also evaluating installing D.O. probes throughout the aeration tanks to be able to better control the operation of the blowers.

Currently, Mr. MacMichael is listed as the only operator of record for the Bellevue WWTP. As a result, the Ohio EPA minimum staffing requirement rule requires him to be physically present at the plant for 40 hours per week in order to meet minimum staffing requirements. We suggest that the City add the other Class III operators that work at the plant as operators of record in order to be able to count their time spent at the towards meeting the minimum staffing requirements. We also discussed that Mr. MacMichael needs to document his time spent at the plant using a hard bound log book. At the time of the inspection, he was tracking his time electronically using a smartphone application. Ohio Administrative Code (OAC) 3745-7-09 states: "...records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within. The records shall be accessible onsite for 24 hour inspections by agency or emergency response personnel." In order to use a smartphone application, the data entered, at a

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minimum, must be time stamped and not allow modification once entered into the application. There must also be a way for the operator to print those records if needed and the phone would need to be available 24/7 at the WWTP. He can still use the application as a tool to track his work, but should also be maintaining an official log at the WWTP.

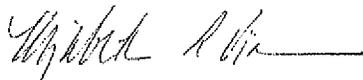
A review of the self-monitoring reports that were submitted under the NPDES permit shows that the Bellevue WWTP is in significant non-compliance (SNC) for the following parameters at Outfall Number 001: Total Filterable Residue (TDS) and Nitrogen Ammonia. I am enclosing a list of violations for this facility for the period of July 1, 2012, through December 31, 2012.

We realize that Bellevue is going to be working through the Pollutant Minimization Process (PMP) in order to determine the cause of the TDS violations and develop a plan to reduce the TDS loads to the plant and the NPDES permit violations. However, we request that a written response be submitted to our office within 30 days of the date of this letter, identifying the specific actions that you have taken to date or propose to undertake in order to return to be compliance with the TDS and Nitrogen Ammonia parameters of your NPDES permit. These actions and timetable may also be submitted via email to andrew.gall@epa.ohio.gov.

Also remember that the Director's Findings and Orders and the NPDES permit compliance schedule require various actions to be completed by specific dates. Please make sure that you are tracking the items that must be completed and are completing them by their due dates and submitting the appropriate documentation to Ohio EPA so that we can verify compliance.

Our completed inspection report and a copy of violations since our last inspection are enclosed for your review. If you have any questions, please contact Mr. Andrew Gall at (419) 373-3003 or via email.

Yours truly,



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

AG/jlm

Enclosures

pc: Eric MacMichael, Superintendent, Bellevue WPCF

ec: Tracking

Compliance Data for City of Bellevue WWTP between 7/1/2012 to 1/1/2013

Summary

Permit Effluent Limit Violations: 16
 Permit Effluent Code Violations: 17
 Permit Effluent Frequency Violations: 0
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.86667	7/1/2012
July 2012	001	Residue, Total Dissolv	30D Conc	1505	2040.	7/1/2012
July 2012	001	Phosphorus, Total (P)	7D Conc	1.5	2.48333	7/22/2012
August 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.5	1.96053	8/1/2012
August 2012	001	Residue, Total Dissolv	30D Conc	1505	2240.	8/1/2012
August 2012	001	Dissolved Oxygen	1D Conc	5.0	2.9	8/14/2012
August 2012	001	Nitrogen, Ammonia (NH3	7D Conc	2.2	4.41429	8/15/2012
August 2012	001	Dissolved Oxygen	1D Conc	5.0	3.6	8/15/2012
September 2012	001	Chronic Toxicity, Ceri	30D Conc	1.0	1.41	9/1/2012
September 2012	001	Chronic Toxicity, Pime	30D Conc	1.0	2.98	9/1/2012
September 2012	001	Residue, Total Dissolv	30D Conc	1505	1560.	9/1/2012
October 2012	001	Nitrogen, Ammonia (NH3	30D Conc	1.5	1.93493	10/1/2012
October 2012	001	Residue, Total Dissolv	30D Conc	1505	1550.	10/1/2012
October 2012	001	Nitrogen, Ammonia (NH3	7D Conc	2.2	3.37733	10/15/2012
November 2012	001	Residue, Total Dissolv	30D Conc	1505	1510.	11/1/2012
December 2012	001	Residue, Total Dissolv	30D Conc	1505	2304.	12/1/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
August 2012	001	Fecal Coliform	AK	8/13/2012
August 2012	001	E. coli	AK	8/13/2012
August 2012	001	Fecal Coliform	AK	8/15/2012
August 2012	001	E. coli	AK	8/15/2012
August 2012	001	Fecal Coliform	AK	8/22/2012
August 2012	001	E. coli	AK	8/22/2012
September 2012	001	Fecal Coliform	AK	9/10/2012
September 2012	001	E. coli	AK	9/10/2012
September 2012	001	E. coli	AK	9/12/2012
September 2012	001	Fecal Coliform	AK	9/25/2012
September 2012	001	E. coli	AK	9/25/2012
October 2012	001	Fecal Coliform	AK	10/3/2012
October 2012	001	E. coli	AK	10/3/2012
October 2012	001	Fecal Coliform	AK	10/16/2012
October 2012	001	E. coli	AK	10/16/2012
October 2012	001	Fecal Coliform	AK	10/24/2012
October 2012	001	E. coli	AK	10/24/2012

Permit #: 2PD00037
 NPDES #: OH0020672



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
2PD00037	OH0020672	01/02/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Bellevue WPCF 500 Great Lakes Pkwy. Bellevue, OH 44811	1:00 PM	2/1/2013
	Exit Time	Permit Expiration Date
	3:00 PM	01/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Eric MacMichael, Superintendent	(419) 483-7514	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Jeff Crosby, Safety Service Director City of Bellevue 3000 Seneca Industrial Pkwy. Bellevue, OH 44811	(419)484-8400	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Inspector	Reviewer
 Andrew Gall Environmental Specialist II Division of Surface Water Northwest District Office	 Thomas Poffenberger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
2/28/13 Date	3/4/13

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

Comments/Status:

- Flow pattern is plug flow
- Sodium Aluminate now used for phosphorus treatment
- As of 12/2012 – Average Daily Flow is 1.3 MGD
- All storm water catch basins drain to pre-aeration tank located between final tanks and sludge press building, the clarifier flows back to the primary clarifier

Section F: Compliance Schedules/Violations

- | | |
|---|-------------------------|
| (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 and DFFO's |
| (e) Permittee is meeting compliance schedule..... | Y |

Comments/Status:

- | |
|---|
| <p>(a) Total Dissolved Solids and Nitrogen Ammonia limit violations</p> <p>(b) City has a PTI for a new UV system to be installed in Spring 2013 with goal to have it operational by April to be able to meet E.Coli limits May 1, 2013.</p> <p>(c) NPDES permit has compliance schedule to develop PMP's for TDS and BEHP and a Toxicity Reduction Plan and evaluation of local limits.</p> <p>(d) The DDFO's require replacement of UV system and steps to improve pretreatment program implementation.</p> |
|---|

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- | | |
|--|-----|
| (a) Standby power available.....generator <input checked="" type="checkbox"/> or dual feed <input type="checkbox"/> | 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: III | 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.....
On MORs <input type="checkbox"/> and/or Spill Hotline (1-800-282-9378) <input type="checkbox"/> | 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) | |
| <p>Operators log book kept in operations room</p> <p>Log book is summarized monthly on a computer log kept by superintendent</p> | |
| (c) Log book(s) kept onsite (in an area protected from weather)..... | Y |
| (d) Log book contains the following: | |

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- 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)... N
- 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..... Y
(CSO and/or SSO)
- (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..... N

Comments/Status:

Treatment Works:
 B. Alarms on main lift station, return pumps, high flow and power failure
 G. Plant staffed 7 days/week (7am - 3PM), Down one operator, RCAPP Rate Study was conducted. City needs to evaluate staffing levels as part of DFFO's.
 J. O&M manual last updated in 1993, will need to update the manual to include the new UV system.

Collection System:
 A. I/I problems in system, televising and repairs ongoing
 G. Need to install alarms on Woodard, Maple, Hospital and Trilogy lift stations over the next few years
 I. Rebuilt the Northwest lift station in 2011 and eliminated the Northgate lift station and replaced with gravity sewer.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
 Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
 (c) Sludge adequately disposed..... Y
 (Method:Land Application, Landfill, Composting)
 (d) If sludge is incinerated, where is ash disposed of N/A
 (e) Is sludge disposal contracted..... Y
 (Name:Mapleview Farms does land application, Mid-Ohio hauls to landfill)
 (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..... Y
 (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:

Using belt press to gravity thicken sludge to help reduce hauling frequency.
 Primary/Final Sludge is landfilled
 Activated Sludge is land applied or composted

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: 12/10/2012)
- (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..... N
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

B. City electrician has ability to calibrate flow measuring devices, recommend that outside company calibrate at least once a permit cycle, Control Associates calibrated meters in December, 2012.

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
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis
conform with 40 CFR 136.3..... Y
- (e) 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
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

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Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
 - (c) Analyses being performed more frequently than required by permit. Y
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: Mercury, Metals, Sludge, Oil and Grease, Toxicity

Lab name: MASI and Environmental Science

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
 - (g) Satisfactory calibration and maintenance of instruments/equipment. Y
 - (h) Adequate records maintained..... Y
 - (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory
- Date: 8/2012

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	Very slight	None	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?

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	Metal Safety Chains Installed, Metal grating installed over valves
	Bypasses	-	
	Stormwater Overflows	-	
	Alternate Power Source	S	Generator , Run once/week and load tested once/quarter
Preliminary	Maintenance of Collection Systems	S	I/I reduction through smoke testing and installing manhole dishes
	Pump Station	In	
	Ventilation	S	
	Bar Screen	In	
	Disposal of Screenings / Grit	S	Landfill
	Grit Chamber	In	
	Septage Receiving Station	In	Station in use by several haulers, must call ahead ½ hr. before arriving
	Alum Feed System	In	Switched to sodium aluminate
Primary	Settling Tanks	In	New Drive Unit Installed in 2010
	Scum Removal	-	
	Sludge Removal	-	
	Effluent	S	
Sludge Disposal	Digesters	In	4 aerobic, using belt press to gravity thicken sludge to 6%-7% solids
	Temperature and pH	-	Diffusers cleaned in two of the digesters
	Gas Production	-	
	Heating Equipment	-	
	Sludge Pumps	In	4 Moyno sludge pumps
	Sludge Belt Filter Press	In	Ashbrook Belt Filter Press
	Disposal of Sludge	S	Mapleview Farms -- Land Applies Liquid, Mid-Ohio hauls primary to landfill
	In-Vessel Compost Bins	OUT	Bins were filled, working on developing a rotation ,
Other	Flow Meter and Recorder	In	Influent Flow Meter / Will be adding final outfall flow meter with UV system
	Records	S	Operators Log Book
	Lab Controls	S	New pH meter and new Ammonia probe
	Chemical Treatment	In	Sodium Aluminate,
Secondary-Tertiary List items as required	Nitrification Towers	In	2 Filters online
	Aeration Tanks	In	3 tanks, operating in plug flow mode - Light Foam
	Intermediate Clarifiers	In	3 tanks online, low foam, low scum, working to rehab them as needed
	Filtrate Clarifier	In	Used when sludge press is operated, effluent routed to primary clarifier
	Final Clarifiers	In	2 in operation, Both drained and repainted last year
Disinfection	Effluent	S	Clean, very light foam Foam, No Odor
	Disinfection System	In	(UV) - System being replaced in Spring 2013
	Effective Dosage	-	Outfall signs in place
	Contact Time	-	
	Contact Tank	-	