



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

March 11, 2013

RE: OBERLIN WTP
PERMIT NO. 3IW00061
LORAIN COUNTY
OBERLIN

Mayor and Council
City of Oberlin
85 South Main Street
Oberlin Ohio 44074

Dear Mayor and Council:

On February 14, 2013, an inspection of the above referenced facility's lime sludge lagoon was conducted. The facility was represented by Mr. Jerry Hade, Superintendent, Mr. Jon Love, Assistant Superintendent, and Mr. Mark Schneider, Lab Technician. The purpose of the inspection was to evaluate the lime sludge lagoon discharge along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The water treatment plant's source of water is from West Branch of the Black River.
2. The West Branch of the Black River is tested for Turbidity, Total Organic Carbon, and UV254. If the appropriate criteria are met, the water is pumped into the City of Oberlin's Water Treatment Plant reservoir.
3. A Total Organic Carbon analyzer was purchased since the last inspection.
4. The water treatment plant process consists of the following:
 - a. Addition of sodium permanganate
 - b. Rapid mix
 - c. Addition of alum, lime, polymer, sodium hexa-meta-phosphate
 - d. Floc chamber
 - e. Sedimentation basin/ sludge blow down to lagoon
 - f. Re-carbonation basin where chlorine is added
 - g. Sand filters
 - h. Clear well – Chlorination in beginning
 - i. Fluoride addition
 - j. Drinking water sent to distribution system
 - k. Sludge blow down from the sedimentation basin is routed to a pit in which rainfall from the roof is mixed with the sludge blow down and then routed to the lime sludge lagoon.
 - l. Mr. Love indicated that the pH of the sludge being routed to the lagoon has a pH of 9.5 S.U. to 11.0 S.U.
 - m. Lime sludge settles out in the lagoon

- n. The supernatant from the lagoon discharges to the West Branch of the Black River.
5. Mr. Hade indicated that approximately 317 dry tons of lime sludge was dredged from the lime sludge lagoon in 2011.
6. He also indicated that over 340 dry tons of lime sludge was excavated from the lagoon in 2012.
7. The Oberlin WTP personnel land apply the lime sludge on local farmer's fields.
8. Mr. Mark Sanders, Lead Operator and Mr. Jon Love maintain these records.
9. The Oberlin Water Treatment Plant applies for a liming permit yearly with the Department of Agriculture.
10. The water treatment plant is currently only discharging from outfall 3IW00061003.
11. The discharge from outfall 3IW00061003 was clear and no visual impact to the receiving stream was observed.
12. A permanent marker at outfall 3IW00061003 was posted per the requirement of Part II, letter G. of the facility's NPDES permit.
13. The method of flow measurement at outfall 3IW00061003 was discussed. The flows being reported on the monthly discharge monitoring reports are based on previous monitoring at the outfall using the "Bucket and Stopwatch" method and the experience of the operator watching the water flow over the baffle at the outfall. It was discussed that a more accurate method of measuring the flow would be required.
14. Use of a "V- notch weir" at the outfall would be considered an acceptable method of measuring the flow.
15. It was discussed when a parameter is tested and the analytical result is non-detect, reporting code "AA" should be reported along with the laboratory detection limit. Currently, the analytical result for phosphorus is being reported as "AA" and a detection limit of "0.0" is being reported in the comment section. The method detection limit should be listed instead of "0.0". On Ohio EPA's Homepage under the Division of Surface Water quick links "e-DMR", it indicates that AA codes now include the method detection limit, MDL, in the same cell separated by a space (i.e., AA 0.05).

This office has recently reviewed your self-monitoring reports covering the period May 1, 2011 through January 31, 2013 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
003	00400	pH	1D Conc	9.0	9.4	7/1/2011
003	00530	Total Suspended Solids	30D Conc	15	15.5	10/1/2012
003	00530	Total Suspended Solids	30D Qty	0.57	2.53444	10/1/2012
003	00530	Total Suspended Solids	1D Qty	0.76	2.53444	10/30/2012

Mr. Hade indicated that the total suspended solids violations were the result of Tropical Storm Sandy. Mr. Schneider indicated that the volume of water flowing over the baffle at outfall 3IW00061003 was extremely high during the time period.

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Please notify this office in writing, within 14 days receipt of this letter, of your intentions to address items 13 and 15. The letter should include dates, either actual or proposed, for completion of the actions. A follow-up inspection will be conducted subsequent to the completion dates. Also, please send a copy of your 2013 Department of Agriculture permit for the lime sludge application.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/cs

cc: Jerry Hade, Water Superintendent, Oberlin WTP