



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

**Re: Notice of Violation**  
Ada WWTP and WTP  
NPDES Permit 2PB00050 and 2IW00320  
Compliance Evaluation Inspection  
Hardin County

May 9, 2013

Mayor and Council  
Village of Ada  
P. O. Box 292  
Ada, Ohio 45810

Dear Mayor and Council:

On May 1, 2013, Mr. Tom Poffenbarger and Ms. Peggy Christie conducted an inspection at the Village of Ada Wastewater Treatment Plant (WWTP) and Ada Water Treatment Plant (WTP). Mr. Phil Epley was present and provided information on the operation and maintenance of each plant. The inspection included a tour of each facility, and a brief review of the laboratory at the WWTP.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the operation and maintenance of the plants.

Our inspection findings are as follows:

#### **Waste Water Treatment Plant**

During our visit, all major treatment units were in operation. The final effluent discharging to Grass Run Creek was clear with no noticeable odor.

During the laboratory review, the pH instrument manual could not be located. It is important to have a copy of the manual at both the WTP and the WWTP.

The plant continues to experience hydraulic overloads during rain events. A Permit to Install (PTI) application for a new WWTP has been submitted to the Ohio EPA and is currently under review.

Mayor and Council  
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Page Two

A review of the discharge monitoring reports (DMRs) from May 2012 through April 2013 indicates that there have been several effluent limit violations. The specific instances of non-compliance are enclosed on a separate sheet.

### **Water Treatment Plant**

A brief inspection of the WTP was also conducted. During our visit, there was no discharge. The west lagoon was being used. No effluent violations have been reported since our last inspection.

If you have any questions or comments concerning the enclosed inspection report, please contact Peggy Christie at 419-373-3006 or e-mail at [Margaret.Christie@epa.ohio.gov](mailto:Margaret.Christie@epa.ohio.gov).

Sincerely,



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

PC/jlm

Enclosures

pc: Mr. Phil Epley, Village of Ada

ec: Inspection Tracking

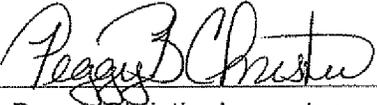
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PB00050	OH0020583	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/1/13	1:00 PM	2:00 PM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Ada WWTP 3623 County Road 44 Ada, OH Hardin County	8/1/2010
	Permit Expiration Date
	7/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Phil Epley, Superintendent	
Name and Title of Responsible Official	Phone Number
Mayor and Council Village of Ada P. O. BOX 292 Ada, OH 45810	(419) 634-4045

SECTION C: AREAS EVALUATED DURING INSPECTION	
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated	
S	NPDES Compliance
S	Operations & Maintenance
S	Facility Site Review
S	Collection System
S	Flow Measurement
S	Receiving Waters
S	Laboratory

Comments:

Signatures	
 5-7-13	 5/1/13
Peggy Christie, Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office

## Compliance Data for Ada WWTP between 5/1/2012 to 4/1/2013

### Summary

Permit Effluent Limit Violations: 11  
 Permit Effluent Code Violations: 0  
 Permit Effluent Frequency Violations: 0  
 Compliance Schedule Violations: 2  
 Reported SSO Events: 1

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.1	1.5825	5/1/2012
May 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.7	2.7	5/1/2012
May 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	3.4	5.91727	5/1/2012
May 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	5.3	12.0590	5/1/2012
May 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.7	3.45	5/8/2012
May 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	5.3	11.3678	5/8/2012
September 2012	001	CBOD 5 day	7D Qty	47.0	47.2178	9/22/2012
October 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	5.3	9.25767	10/1/2012
February 2013	001	Total Suspended Solids	7D Conc	23.0	42.	2/22/2013
February 2013	001	Total Suspended Solids	7D Qty	175	476.91	2/22/2013
March 2013	001	CBOD 5 day	7D Conc	15.0	17.	3/22/2013

Upcoming Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
August 2014		5699	Construction	Final Compliance w/ Eff Limits
August 2014		5699	Construction	Final Compliance w/ Eff Limits

Parameter	Units	Date	Reported Value
Overflow Occurrence	No./Month	2/27/2013	1
Overflow Occurrence	No./Month	2/28/2013	1

Flow Data for Ada WWTP between 5/1/2012 and 4/1/2013

	Date	Flows (MGD)
Ten Highest Flows	1/11/2013	3.205
	1/30/2013	3.198
	2/27/2013	3.009
	1/14/2013	3.000
	2/28/2013	3.000
	1/15/2013	2.896
	1/12/2013	2.855
	1/13/2013	2.837
	9/26/2012	2.783
	10/6/2012	2.675
<b>Average Flow Rate</b>		0.810

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Products and production rates conform with permit application ..... Y
- (d) Flows and loadings conform with NPDES permit ..... Y
- (e) Treatment processes are as described in permit application ..... Y
- (f) New treatment process added since last inspection ..... Y
- (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:

**SECTION E: 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) Permittee is meeting compliance schedule ..... Y

Comments:

**SECTION F: OPERATION AND MAINTENANCE**

- (a) Standby power available ..... Y  
If yes, what type? *Generator*
- (b) Adequate alarm system available for power or equipment failures ..... Y
- (c) All treatment units in service other than backup units ..... II
- (d) Wastewater Treatment Works classification.....
- (e) Operator of Record holds unexpired license of class required by Permit .. Y  
Class held: III
- (f) Copy of certificate of Operator of Record displayed on-site ..... Y
- (g) Minimum operator staffing requirements fulfilled ..... Y
- (h) Routine and preventative maintenance scheduled and 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  
By MOR  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection..... Y

Comments: Hydraulic overloads

**SECTION G: RECORD KEEPING**

- a) Log book provided ..... Y
- b) Format of log book (i.e. computer log, hard bound book)  
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) ..... Bench sheets
  - v) Identification of person making log entries ..... Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred?.... Y

Comments:

**SECTION H: COLLECTION SYSTEM**

- a) Percent combined system: ..... 0%
- b) Any collection system overflows since last inspection..... Y  
CSO  SSO
- c) Regulatory agency notified of overflows ..... 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 are used to relieve system..... N
- g) Lift station alarms provided and maintained ..... Y
- h) 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
- l) Are operations changed during high-flow events?..... N

Comments: Plans in place for building a new plant. The plant experiences hydraulic overloads, but until the upgrade, it is unclear whether the collections system is at or near capacity. There are three lift stations in the collection system.

**SECTION I: SLUDGE MANAGEMENT**

- a) Sludge management plan (SMP) last audited by Ohio EPA:  
Audit Date: June 14, 2011
- b) Sludge adequately disposed ..... Y  
Method: Land Application
- c) If sludge is incinerated, where is ash disposed of ..... N/A
- d) Is sludge disposal contracted ..... Y  
Name: Craig Services
- e) Has amount of sludge generated changed significantly ..... N
- f) Adequate sludge storage provided at plant ..... Y
- g) Records kept in accordance with State and Federal law ..... Y
- h) Any complaints received last year regarding sludge ..... N
- i) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments: Phil is still getting requests for the annual sludge report for Hillcrest MHP.

**SECTION J: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained ..... Y  
Type of device: Ultrasonic and weir Device location: Effluent
- b) Calibration frequency adequate ..... Y  
Date of last calibration: June 2012
- c) Secondary instruments operated and maintained ..... Y
- d) Flow measurements equipment adequate to handle full range of flows .... Y
- e) Actual flow discharged is measured ..... Y
- f) Flow measuring equipment inspection frequency: Daily
- g) Sampling location(s) are as specified by permit ..... Y
- h) Parameters and sampling frequency agree with permit ..... Y
- i) 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  
(For ever)

Comments:

**SECTION K: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... Y
- b) If alternate procedures are used, are they properly approved? ..... N/A
- c) Analysis performed more frequently ..... NE  
     If yes, are results recorded in permittee's report? ..... NE
- d) Commercial laboratory used:  
     Name: Masi and Alloway  
     Parameters analyzed: @ Masi: Phosphorus, e Coli, metals, Nitrate,  
     Nitrite. @ Alloway: CBOD, TSS
- e) Quality assurance manual provided and maintained ..... Y
- f) Calibration and maintenance of instruments is satisfactory? ..... Y
- g) Results of last U.S. EPA quality assurance ..... N/A  
     Date:

Comments: pH was reviewed in the General Lab Criteria. The instrument manual could not be located. The form is attached.

**SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Yes	No	No	Clear	No	No	None	

Comments:

**SECTION M: 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: The village of Ada has submitted a PTI to DEFA for a new WWTP. The new plant will be designed for 2 MGD.

# General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>pH Meter</b>				
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) <sup>3</sup>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<b>M</b>
	• Logbook maintained <sup>2</sup>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Minimum of 2 point calibration	• Calibration per manufacturer specification and calibration buffers must bracket anticipated result <sup>7</sup>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Slope acceptable range indicated on benchsheet <sup>2</sup>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Buffer Expiration Date	• Buffers must not be expired	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Instrument manual available	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing <sup>8</sup>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Comments: Instrument manual was not available during the inspection.

Criteria	Standard Methods Requirement	Acceptable?		Rating
<b>Dissolved Oxygen Meter</b>				
• Calibration Method	• Air or known DO calibration method <sup>10</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration per manufacturer specification <sup>10</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Logbook maintained <sup>2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration verification required at least once each day the meter is used. <sup>3</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Small to no bubble present under membrane (must be smaller than the lead in number 2 pencil) <sup>11</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: Not evaluated

# General Lab Criteria

<b>Number of Criteria Rated:</b>	Acceptable	
	Marginal	1
	Unacceptable	
	<b>Total Number of Areas Rated</b>	<b>1</b>
<p><b>Acceptable Ratings</b> – No action required (recommend SOP's written or updated, perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, written response not required).</p>		
<p><b>Marginal Ratings</b> – Improvements required, written response required (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response).</p>		
<p><b>Unsatisfactory Rating</b> - Improvements required, written response required, NOV issued (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response to NOV).</p>		
Consider recommending PAI Audit from DES when:	>60% of ratings are Marginal >45% of ratings are a combination of Marginal or Unacceptable >30% of ratings are Unacceptable	

## Notation of Referenced Method

- |                            |                              |
|----------------------------|------------------------------|
| 1 Method 9020-B, Item 3    | 14 Method 1060A, Item 1      |
| 2 Method 1020-A, Item 1    | 15 Method 4500-CI I, Item 2  |
| 3 Method 1020-B, Item 10   | 16 Method 4500-CI I, Item 4  |
| 4 Method 2540-B, Item 2    | 17 Method 4500-NH3 D, Item 4 |
| 5 Method 2550-B, Item 1    | 18 Method 4500-NH3 D, Item 2 |
| 6 Method 1020-A, Item 1    | 19 Method 1060-B, Item 2     |
| 7 Method 4500-H B, Item 4  | 20 Method 1060-B, Item 1     |
| 8 Method 4500-H B, Item 2  | 21 Method 9222D, Item 1      |
| 9 Method 1020-B, Item 2    | 22 Method 9223 B, Item 2     |
| 10 Method 4500-O B, Item 3 | 23 Method 9223 B, Item 3     |
| 11 Method 4500-O G, Item 3 | 24 Method 1603, Item 2       |
| 12 Method 5210-B, Item 5   | 25 Method 9030-B, Item 3     |
| 13 CFR 136.3, Table II     | 26 Method 9020 B, Table IV   |

**Equipment Logbook Content** - all maintenance performed on a piece of equipment should be documented in the logbook. This should include parts replacement and routine maintenance activities. Entries should include date, maintenance performed and initials of person making entry.

## **Preservation and Holding Times**

Parameter	Container	Min. Sample Size (mL)	Sample Type	Preservation	Maximum Storage Time	
					Recommended	Regulatory
BOD / CBOD	P, G	1000	G, C	Refrigerate ≤6° C	6h	48h
TSS	P, G	200	G, C	Refrigerate ≤6° C	7 d	7 d
pH	P, G	50	G	Analyze immediately	0.25h	0.25 h
NH3-N	P, G	500	G, C	Analyze as soon as possible or add H <sub>2</sub> SO <sub>4</sub> to pH <2, Refrigerate	7 d	28 d

# General Lab Criteria

				≤6° C		
TRC	P, G	500	G	Analyze immediately	0.25h	0.25 h
DO (electrode)	G, BOD Bottle	300	G	Analyze immediately	0.25h	0.25 h
Temperature	P, G	–	G	Analyze immediately	0.25h	0.25 h
Metals, general	P, G	1000	G, C	For dissolved filter immediately and add HNO <sub>3</sub> to pH <2	6 months	6 months
Purgeables by purge and trap	G (PTFE lined lid)	40 (X2)	G	HCl to pH<2, Refrigerate ≤6° C	7 d	14 d
Base/Neutrals and acids	G (solvent rinsed or baked)	1000	C, G	Refrigerate ≤6° C	7 d	7 days until extraction 40 days after extraction
Pesticides	G (PTFE lined lid)	1000	C	Refrigerate ≤6° C	7 d	7 days until extraction 40 days after extraction
Fecal Coliform / E-Coli	G, P (Sterilized)	100	G	Refrigerate ≤10° C If chlorine present, add sodium thiosulfate tablet	6 hrs transport. Start analysis within 2 hrs of receipt in lab.	
Oil and Grease	G	1000	G	HCl or H <sub>2</sub> SO <sub>4</sub> to pH <2, Refrigerate ≤6° C	28 d	28 d

## Approved Standard Methods

CBOD / BOD 5 Day	Std Methods 5210-B
Ammonia, Selective Electrode Method	Std Methods 4500-NH3 D
Total Residual Chlorine, DPD Colorimetric Method	Std Methods 4500-Cl G
Total Suspended Solids, Dried at 103-105 °C	Std Methods 2540-D
Dissolved Oxygen, Membrane Electrode Method	Std Method 4500-O G
pH, Electrometric Method	Std Methods 4500-H+ B
Fecal Coliform, Membrane Filter Procedure	Std Methods 9222D
Escherichia Coli, Enzyme Substrate Test	Std Method 9223B
Escherichia Coli Membrane Filtration Procedure	EPA Method 1603
Oil and Grease	USEPA 1664A or Std Methods 5520B
Metals, general	USEPA 200, Std Methods 3111B or C, or 3120B
Volatiles (Purgeables by purge and trap)	USEPA 6210, Std Methods 624
Semi-Volatiles (Base/Neutrals and acids)	USEPA 6410, Std Methods 625
Pesticides	USEPA 6410 and 6630, Std Methods 608



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
2IW00320	OH0102458	5/01/13	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Ada WTP 110 Simon Court Ada, Hardin County, Ohio	2:00 PM	May 1, 2010
	Exit Time	Permit Expiration Date
	2:30 PM	April 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Phil Epley, Superintendent Email: philepley.ada@gmail.com	419-634-4045	
Name, Address and Title of Responsible Official	Phone Number	
Mayor & Council Village of Ada P.O. Box 292 Ada, Ohio 45810	419-634-4045	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	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)**

There was no discharge during the inspection.  
The water observed in the west lagoon was clear with no noticeable odor.  
No violations have been reported since the last inspection.

Inspector	Reviewer
<i>Peggy B. Christie</i> 5-7-13 Peggy B. Christie Date Division of Surface Water Northwest District Office	<i>Thomas Poffenbarger</i> 5/7/13 Thomas Poffenbarger, P.E. Date Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office