



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

Re: Ottawa County  
City of Port Clinton  
NPDES Permit

May 13, 2013

Mr. Tracy Colston  
Safety-Service Director  
City of Port Clinton  
1002 East Perry Street  
Port Clinton, Ohio 43452

Dear Mr. Colston:

On April 23, 2013, Mr. Rick Zuzik conducted a compliance inspection of the waste water treatment facilities serving the City of Port Clinton. Mr. Ernie Isaac, Superintendent, was present and provided information regarding plant operations. At the time of our visit, all major treatment components were in operation, and a clear final effluent was observed being discharged. Our comments and recommendations are as follows:

- 1) Columbia Gas, while smoke testing, inadvertently discovered the building sewers of eight homes and one bar business in the Maple Street area directly tied into a storm sewer that outlets near the public beach. Apparently, the buildings have been directly connected to the storm system for 50 or more years. The City has thus far connected, at their expense, the business and three homes to the sanitary sewer, with the remaining to follow. Please notify us when the taps are completed, and/or if additional buildings are discovered.
- 2) We received the 2012 Mercury Pollutant Minimization Plan (PMP) report that reflects the first full year of implementation. The first round of sampling focused on the main trunk sewer, lift stations and manholes. Varying concentrations of mercury are being detected throughout the collection system, and two 30-day average low level mercury effluent violations were reported in 2012. A list of potential sources of mercury has been generated; however, the City has been reluctant to send out informational letters due to outdated legal authority. Preliminary work updating the city Sewer Use Ordinance (SUO) has been done, but remains unfinished. Your 2010 PMP identified the updating of the SUO as a first year goal, and it is critical that the City focus on completing this task in order to begin taking meaningful steps in identifying and reducing mercury sources. Port Clinton was granted mercury variance final effluent limits contingent on the satisfactory implementation of your approved PMP. Please notify us in writing when we can expect the SUO to be updated.

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- 3) Monthly Combined Sewer Overflow (CSO) and National Pollutant Discharge Elimination System (NPDES) discharge monitoring reports (DMRs) are being received in a timely manner and indicated six CSO events during 2012, and two thus far in 2013. Telephone and written notification following overflow events are being received in a timely manner. Bypass Notification Form 4498 can be emailed to me directly to satisfy the 24 hour notification requirement. Usage of this form also eliminates the need to complete the 5-Day Follow Up Report. The plant has been in full compliance with all NPDES final effluent limitations since our inspection except for the above mentioned low level mercury violations.
- 4) A street sweeping program has been established as part of the Nine Minimum Controls CSO Strategy, which also aids in reducing the atmospheric mercury deposition into the collection system. CSO telemetry was installed last August and was properly calibrated this spring. The Taft Street sanitary sewer replacement project is scheduled for this summer, as well as limited sewer relining.
- 5) Meetings have been held for homeowners and businesses along Lakeshore Drive to inform them of the availability and options for tapping into the force main. A majority of package sanitary treatment plants have been abandoned and we will continue working with the remaining commercial entities to connect to the line. We are concerned with the residential area known as Asher Beach, which is not immediately accessible and will require a formal sanitary sewer project.
- 6) Lab personnel received all "acceptable" results in the latest 2012 U.S. EPA laboratory quality assurance sampling program, DMRQA # 32. This is the highest rating available.
- 7) Mr. Isaac informed me that a replacement Class I Operator has been hired and the plant is now adequately staffed

If you have any questions, or any of the above is in error, please call Rick Zuzik at (419) 373-3020, or email at [rick.zuzik@epa.ohio.gov](mailto:rick.zuzik@epa.ohio.gov).

Yours truly,



Elizabeth A Wick, PE  
Environmental Engineer/Section Manager  
Division of Surface Water

RAZ/jlm

Enclosure

pc: Ernie Isaac, Superintendent

ec: Tracking



State of Ohio Environmental Protection Agency  
Northwest District Office

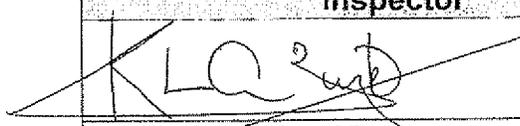
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PD000014	OH0005287	4/23/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Port Clinton WWTP 100 N. Jackson St. Port Clinton, OH 43452	10:00 am	8/1/2011
	Exit Time	Permit Expiration Date
	12:00 pm	7/31/2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ernie Isaac, Superintendent	(419)734-3221	
Name, Address and Title of Responsible Official	Phone Number	
Tracy Colston, Safety-Service Director	(419) 732-2206 X8	

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

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

Inspector	Reviewer
 Richard A. Zuzik, MSE Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II / Unit Supervisor Division of Surface Water Northwest District Office
Date 5-8-13	Date 5/8/13

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

Comments/Status:

**Section F: Compliance Schedules/Violations**

- (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..... N
- (d) Compliance schedule contained in USEPA Consent Order
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

City has complied with compliance schedule but continues to operate under USEPA Consent Order, which allows them to qualify for financial assistance for collection system improvement projects

**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)..... III
- (e) Operator of Record holds unexpired license of class required by permit..... Y  
 Class: III
- (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..... Y
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N/A
- (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

**Record Keeping:**

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)  

Hard bound Logbooks
- (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
- (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: 50%
- (b) Any collection system overflows since last inspection..... Y  
(CSO X and/or SSO )
- (c) Regulatory agency notified of overflows (CSOs)..... Y
- (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..... (Not all)..... 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:

6 CSO events in 2012, and 2 thus far in 2013

Adams St. CSO (003)- Telemetry installed to monitor flow and duration

Replacement Class I Operator hired last year- now adequately staffed

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date:                      Approval #:                      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..... Y  
(Name: Republic)
- (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)..... N/A

**Comments/Status:**

All sludge disposed of in landfill  
3 or 4 loads /week

**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: 4/12)
- (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:**

Flow meter calibrated annually

**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

**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..... Y
- (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: Metals, Mercury

Lab name: Alloway

*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: X Satisfactory  Marginal  Unsatisfactory
- Date: DMRQA, #32

**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	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	-	
	Stormwater Overflows	Out	6 events in 2012
	Alternate Power Source	S	Diesel back-up
Preliminary	Maintenance of Collection Systems	S	Established street cleaning program
	Pump Station	In	16 total
	Ventilation	S	
	Bar Screen	In	Two, auto fine screen
	Disposal of Screenings	S	Landfill
	Comminutor	-	
	Grit Chamber	In	Dewatering screw pump, 2 grit classifiers
	Disposal of Grit	S	Landfill
Primary	Settling Tanks	-	
	Scum Removal	-	
	Sludge Removal	-	
	Effluent	S	
	Actiflo	In	Two, units alternate for primary treatment. Both in storm mode
Sludge Disposal	Aerobic Sludge Holding	In	
	Temperature and pH		
	Gas Production		
	Heating Equipment		
	Sludge Pumps	In	Two Primary, Two belt press feed
	Drying Beds		
	Belt Filter Press	In	
Disposal of Sludge	S	Landfill	
Other	Flow Meter and Recorder	In	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	In	Ferrous Chloride
Secondary-Tertiary <small>List items as</small>	Aeration/ Clarifier	In	Three round tanks, reddish brown mixed liquor
Disinfection	Effluent	S	Very Clear
	Disinfection System	In	Cl2
	Effective Dosage	S	
	Contact Time	S	
	Contact Tank	In	
	Dechlorination	In	Sodium Bisulfite