



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

Re: Erie County
Sandusky
NPDES Permit

May 21, 2013

Ms. Nicole Ard
Sandusky City Manager
222 Meigs Street
Sandusky, Ohio 44870

Dear Ms. Ard:

On April 30, 2013, Mr. Rick Zuzik conducted a compliance inspection of the wastewater treatment facilities serving the City of Sandusky. Mr. Jeff Meinert, Superintendent, was present and provided information on plant operations. At the time of our visit, all treatment units were in operation, and a very clear final effluent was observed discharging from the plant. Our comments are as follows:

- 1) The draft National Pollutant Discharge Elimination System (NPDES) permit renewal was issued April 24, 2013. It should be reviewed carefully, as there is a 30 day comment period to respond to any permit conditions. No major revisions are proposed; however, the treatment plant has been reclassified as a Class IV facility. Mr. Meinert currently has a Class III Operator license and will be provided 12 months to obtain the higher classification. Once issued as a final action, the renewed NPDES permit will remain in effect for another five year period.
- 2) The next phase of the City's approved general plan is addressing the two major CSO's at Ogontz and Mills Street. A meeting was held last November to discuss proposed revisions to the general plan. Major items included the elimination of the Pier Track Pump Station (PS), construction of a new Third Street PS coupled with a 1 mg EQ basin, and a 30-inch cross town force main. These would achieve multiple goals: 1) lessen the CSO's to four or less events per year while providing enhanced treatment for captured flow, 2) eliminate illegal sanitary sewer overflows at Pier Track PS, and 3) provide capacity for Erie County's increased maximum flow per the city/county contract agreement. It is imperative to keep project momentum going forward in order to meet the general plan compliance milestones.

We previously stated that Mr. Meinert has been able to treat up to the design 42 million gallons peak wet weather flow, but a bottleneck surfaced at the aerated grit tanks. This issue will be addressed and included in Phase I improvements described above and may lead to increased wet weather treatment capacity.

A review of CSO activity indicated 27 reported events in 2012. CSO outfalls are being posted when active, and 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 number, volume and length of overflow events have decreased. The Tiffin Ave CSO was permanently sealed in May 2012, and has been removed in the draft NPDES permit renewal. No bypass pumping occurred in 2012.

- 3) A Mercury variance renewal application was submitted as part of the NPDES permit renewal. All known mercury sources have been identified and a progress report documenting implementation of the Mercury Pollutant Minimization Plan (PMP) was included. There have been no effluent violations of the mercury variance limit since it was imposed, and the average effluent mercury level has decreased each year since 2009. Significant industries have been sampled three times thus far and have not shown to be an area of concern. 2013 sampling utilizing low level mercury Method 1631 will be targeted to areas with highest previous readings. The City has an ongoing mercury thermometer exchange program, and is working with Erie County to host household hazardous waste collection events. Please continue to implement the mercury PMP as approved.
- 4) NPDES monthly discharge monitoring reports are being received and indicated one pH violation in 2012 and one total suspended solids weekly loading violation thus far in 2013. This was attributed to three consecutive days of high flow and poor settling sludge. Air feed to the aeration tanks was adjusted to improve mixing, which decreased filamentous bacteria and the plant returned to compliance. I informed Dawn Meyers, Compliance Officer, that it was no longer necessary to continue additional bacteria sampling recommended in a 1995 CSO operational plan, as monitoring has since been addressed in the NPDES permit.
- 5) Negotiations with Erie County are being finalized allowing the unsewered Village of Bay View to connect into the City's collection system. Due to wet weather flow limitations at the Venice pump station, connection will be into a downstream sewer with adequate capacity.
- 6) Mr. Meinert and his staff continue to operate and maintain the facility very well, and we appreciate their dedication. The lab personnel were once again recognized by U.S. EPA for achieving 100% compliance with the most recent U.S. EPA laboratory quality assurance performance evaluation program # 32.

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.

Yours truly,



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

RAZ/jlm

Enclosures

pc: Jeff Meinert, 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
2PF00001*ND	OH0027332	4/30/2013	C	S	1

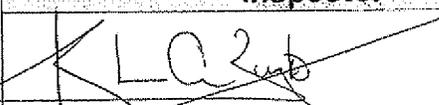
Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Sandusky WPC Plant 304 Harrision St Sandusky, OH 44870	10:00 am	*See Section D
	Exit Time	Permit Expiration Date
	12:00 pm	*See Section D
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Jeff Meinert, Superintendent		(419) 627-5907
Name, Address and Title of Responsible Official		Phone Number
Nicole Ard, City Manager		(419) 627-5844

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	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
M	Collection System				

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

*Draft NPDES Permit Renewal Public Notice Date - April 24, 2013

Comment Period Ends: May 24, 2013

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
5-17-13 Date	5/17/13 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)..... | 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:

Draft NPDES Permit Renewal Public Notice Date - April 24, 2013

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..... | Y |
| (d) Compliance schedule contained in | NPDES and Director's Findings and Orders |
| (e) Permittee is meeting compliance schedule..... | Y |

Comments/Status:

Director's Findings and Orders for CSO's – Improvements on schedule, addressing Ogontz and Mills St next

All items in NPDES Compliance Schedule met

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 (Renewal to require Class IV)
- (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/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..... Y
 (Grit Chamber surcharges over 42 mgd)

Record Keeping:

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

Hard bound Logbook
- (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: 80%
- (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..... 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:

30 CSO events in 2012- Lesser volume and duration since main interceptor cleaning project completed

No Bypass Pumping in 2012

6 Water in Basement events in 2012

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: Fertility Builders)
- (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:

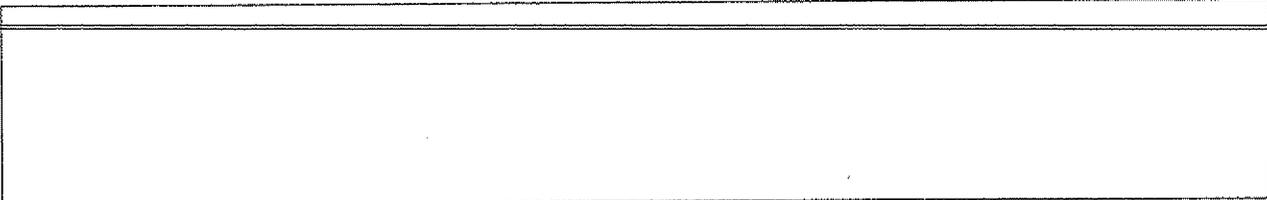
Centrifuge producing 36% solids- 90% of sludge disposed of in landfill. Minimal amount
land applied to keep option available with contractor
No longer accepting sludge from Erie County to prepare for increased summer flow

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: 9/12)
- (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:



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: Jones & Henry, 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: 2011, #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	14 CSO's
	Alternate Power Source	S	Back up Diesel Generator
Preliminary	Maintenance of Collection Systems	S	
	Pump Station	In	4 Major, 12 Minor
	Ventilation	S	
	Bar Screen	In	3 Automatic
	Disposal of Screenings	S	Landfill
	Comminutor	-	
	Grit Chamber	In	3 Aerated Tanks- overflow above 42 mgd (bottleneck of plant)
	Disposal of Grit	S	Landfill
Primary	Settling Tanks	In	3 Round
	Scum Removal	S	
	Sludge Removal	S	
	Effluent	S	Normal
Sludge Disposal	Digesters	In	4 primary, 2 secondary, 1 gravity Thickener
	Temperature and pH	S	
	Gas Production	S	
	Heating Equipment	S	
	Sludge Pumps	In	5 WAS
	Drying Beds	-	
	Vacuum Filter	-	
	Disposal of Sludge	S	90% landfilled
	Centrifuge	In	
Other	Flow Meter and Recorder	In	Influent and effluent
	Records	In	
	Lab Controls	S	
	Chemical Treatment	In	Ferrous at aerated grit
Secondary-Tertiary <small>List items as</small>	Final Settling	In	2, 125 ft diameter, High Rate Clarifiers
	Aeration	In	3 sets, Reddish Brown, fine bubble diffusers
	Effluent Pumps	In	
Disinfection	Effluent	S	Very Clear
	Disinfection System	In	UV
	Effective Dosage	In	Started 2 weeks prior to season
	Contact Time	-	
	Contact Tank	-	
	Dechlorination	-	