



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

Re: Celina WWTP
NPDES Permit 2PD00033
Compliance Evaluation Inspection
Mercer County

June 3, 2013

Mr. Thomas Hitchcock
Safety Service Director
Celina WWTP
426 West Market Street
Celina, Ohio 45822

Dear Mr. Hitchcock:

On May 16, 2013, a Compliance Evaluation Inspection (CEI) was conducted at the Celina Wastewater Treatment Plant (WWTP). Mr. Kerry Duncan and Ms. Michelle Sharp of the Ohio EPA, Northwest District Office, Division of Surface Water were present for the inspection. 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 plant.

At the time of inspection, all major treatment components were in service and the plant was discharging a clear final effluent. The treatment plant laboratory, which also contains an energy control area, is small for all of the sampling that is required. A larger area designated only for laboratory use is recommended. Construction for the sludge and bypass upgrades is ongoing.

Part I,C(B)(2) of your NPDES permit states:

"Four months from the effective date of this permit, the permittee shall submit to the Ohio EPA Northwest District Office a brief status report on the ability of its existing treatment facilities to meet the final effluent limit for E. coli."

This report was due January 1, 2013, and we have not received it yet. Please submit this status report within 14 days of receipt of this letter.

Mr. Thomas Hitchcock
June 3, 2013
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We are in receipt of your discharge monitoring reports covering the months of April 2012 through April 2013. Our review indicates violations of the conditions of your NPDES permit. The specific instances are enclosed with this letter.

If you have any questions or comments concerning the enclosed inspection report, please contact Ms. Michelle Sharp at 419-373-3019 or e-mail at Michelle.Sharp@epa.ohio.gov.

Sincerely,



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

MS/jlm

Enclosure

pc: Mr. Kerry Duncan, Superintendent, Celina Wastewater Treatment Plant

ec: Tracking

NPDES Compliance Inspection Report

| SECTION A: NATIONAL DATA SYSTEM CODING | | | | |
|----------------------------------------|------------|-----------------|---------------------|----------------------------|
| Permit # | NPDES # | Inspection Type | Inspector | Facility Type |
| 2PD00033 | OH0020320 | CEI | S | 1 |
| Inspection Date | Entry Time | Exit Time | Notice of Violation | Significant Non-Compliance |
| 5/16/2013 | 9:30 AM | 11:30 AM | No | No |

| SECTION B: FACILITY DATA | |
|------------------------------------------------------------|------------------------|
| Name and Location of Facility Inspected | Permit Effective Date |
| Celina WWTP 1125 South Elm Street Celina, Ohio 45822 | 9/1/2012 |
| | Permit Expiration Date |
| | 1/31/2017 |
| Name(s) and Title(s) of On-Site Representatives | Phone Numbers |
| Mr. Kerry Duncan, Superintendent | (419) 586-2451 |
| Name and Title of Responsible Official | Phone Number |
| Thomas Hitchcock, Safety Service Director | (419) 586-6464 |

| 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 |
| N | Laboratory |

Comments:

| Signatures | |
|-------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <i>Michelle Sharp</i> 6/3/13 | <i>Thomas Poffenbarger</i> 6/3/13 |
| Michelle Sharp, Inspector Compliance & Enforcement Division of Surface Water District Office | Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water District Office |

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

Summary

Permit Effluent Limit Violations: 9
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 1
 Compliance Schedule Violations: 1

| Limit Violations | | | | | | |
|------------------|---------|-----------------------|------------|-------|----------------|----------------|
| Reporting Period | Station | Parameter | Limit Type | Limit | Reported Value | Violation Date |
| September 2012 | 001 | Phosphorus, Total (P) | 30D Conc | 0.83 | .9975 | 9/1/2012 |
| September 2012 | 001 | Phosphorus, Total (P) | 7D Conc | 1.24 | 1.65 | 9/1/2012 |
| November 2012 | 001 | Phosphorus, Total (P) | 30D Conc | 0.83 | 1.285 | 11/1/2012 |
| November 2012 | 001 | Phosphorus, Total (P) | 7D Conc | 1.24 | 2.08 | 11/1/2012 |
| November 2012 | 001 | Phosphorus, Total (P) | 7D Conc | 1.24 | 1.66 | 11/8/2012 |
| November 2012 | 001 | Phosphorus, Total (P) | 7D Qty | 14.1 | 17.3099 | 11/8/2012 |
| January 2013 | 001 | Phosphorus, Total (P) | 7D Qty | 14.1 | 17.9295 | 1/8/2013 |
| April 2013 | 001 | Phosphorus, Total (P) | 30D Qty | 9.43 | 11.8145 | 4/1/2013 |
| April 2013 | 001 | Phosphorus, Total (P) | 7D Qty | 14.1 | 34.8522 | 4/8/2013 |

| Frequency Violations | | | | | | |
|----------------------|---------|------------|------------------|----------|----------|----------------|
| Reporting Period | Station | Parameter | Sample Frequency | Expected | Reported | Violation Date |
| May 2012 | 601 | CBOD 5 day | 3/Week | 3 | 2 | 5/15/2012 |

| Missing Compliance Schedule Milestones | | | | |
|----------------------------------------|-----------------|------------|---------------|--------------------------------|
| Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone |
| January 2013 | | 15099 | Bypass | Discharge Prevention Plan |
| January 2013 | 12/10/12 | 95999 | Other | Status Report |
| September 2013 | | 5699 | Construction | Final Compliance w/ Eff Limits |
| September 2013 | | 95999 | Other | Status Report |
| September 2014 | | 95999 | Other | Status Report |
| September 2015 | | 93899 | Other | Implement Pollution Plan |
| September 2016 | | 95999 | Other | Status Report |

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

| | Date | Flows (MGD) |
|--------------------------|-----------|-------------|
| Ten Highest Flows | 4/11/2013 | 14.536 |
| | 1/13/2013 | 10.986 |
| | 4/10/2013 | 9.208 |
| | 1/12/2013 | 8.432 |
| | 1/11/2013 | 8.242 |
| | 4/12/2013 | 7.690 |
| | 1/30/2013 | 7.199 |
| | 4/24/2013 | 6.702 |
| | 4/16/2013 | 6.423 |
| | 8/5/2012 | 6.236 |
| Average Flow Rate | | 2.168 |

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 NA
- (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..... N
- (g) Notification given to State of new, different or increased discharges NA
- (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 N
- (b) Permittee is taking actions to resolve violations NA
- (c) Permittee has a compliance schedule Y
- (d) Permittee is meeting compliance schedule N

Comments:

(d) A status report about meeting the new E. Coli limit was to be submitted Jan 1, 2013.

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 Y
- (d) Wastewater Treatment Works classification..... III
- (e) Operator of Record holds unexpired license of class required by Permit..
Class held: IV
- (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 Y
- (l) Regulatory agency notified of bypasses..... Y
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection..... Y

Comments:

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book (i.e. computer log, hard bound book)
Computer, Daily Sheets
- 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
- 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..... NA
- e) CSOs monitored and reported in accordance with permit NA
- 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?..... Y

Comments:

- (b) April 11, 2013, minor overflow from liftstation
- (h) 3 with permanent standby power and 10 without
- (l) The 2nd screw pump comes on and the ditch aerators turn off

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP) last audited by Ohio EPA:
Audit Date: 5/2/12
- b) Sludge adequately disposed Y
Method: Land Application
- c) If sludge is incinerated, where is ash disposed of NA
- d) Is sludge disposal contracted Y
Name: Zumberge/Merlin Farms
- 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:

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained Y
Type of device: Ultrasonic and Parshall Flume Device location: Effluent
- b) Calibration frequency adequate Y
Date of last calibration: 8/10/12
- 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 Y
including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) Y

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? NA
- c) Analysis performed more frequency Y
 If yes, are results recorded in permittee's report? Y
- d) Commercial laboratory used:
 Name: Brookside/Belmont
 Parameters analyzed: BOD, O&G, Phosphorous, Nitrate &
 Nitrite/Hardness Metals, Mercury, Specific Gravity, Cyanide, Sludge
 parameters
- 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 PASS
 Date: 2012

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

| Outfall Number | Outfall sign in place | Oil Sheen | Grease | Turbidity | Foam | Solids | Color | Other |
|----------------|-----------------------|-----------|--------|-----------|------|--------|-------|-------|
| 001 | Yes | No | No | No | No | No | Clear | NA |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

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..... NA
- 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:

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 | - | |
| | Safety Features | S | |
| | Plant Bypass | OUT | |
| | Alternate Power Source | OUT | Generator |
| | | | |
| Preliminary | Maintenance of Collection Systems | S | |
| | Screw Pumps | IN | 1 of 3 in service. Second goes online at 7.5 MGD |
| | Coarse Bar Screen | IN | Manual Clean |
| | Bar Screen | IN | 1 of 2 screens in service. Second goes online at 7.5 MGD |
| | Disposal of Screenings | S | Landfill |
| | Grit Chamber | IN | Aerated |
| | Disposal of Grit | S | Landfill |
| Primary | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Sludge Disposal | Digesters | IN | Aerobic units - 4 Units |
| | Dewatering Tank | IN | Dewaters sludge before aeration tanks |
| | Sludge Holding Tank | IN | Stores digested sludge until it can be centrifuged |
| | Extra Sludge Holding | OUT | |
| | Centrifuge | IN | |
| | Disposal of Sludge | S | Land application |
| | | | |
| Other | Flow Meter and Recorder | IN | |
| | Records | S | |
| | Lab Controls | S | |
| | | | |
| Secondary-Tertiary | Oxidation Ditches | IN | 2 Ditches, Good color |
| | Secondary Clarifiers | IN | 2 units, some scum, clear effluent |
| | Sodium Aluminate | IN | 17 gallon/day for phosphorous control |
| | | | |
| Disinfection | Effluent | S | |
| | Disinfection System | IN | UV |
| | Post Aeration | IN | |
| | Chlorine | IN | Chlorinate RAS for filamentous bacteria control |
| | | | |