



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

May 31, 2013

Steven Smith, Manager
Canal Winchester WWTP
36 South High Street
Canal Winchester, OH 43110

**Re: Canal Winchester WWTP
NPDES Permit 4PB00012/ OH0024333
Compliance Evaluation Inspection
Franklin County**

Dear Mr. Smith:

On May 15, 2013, a Compliance Evaluation Inspection was conducted at the Canal Winchester WWTP. Present for the inspection were you, the operator of record, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

Findings:

1. Attached are compliance tables since September 2012. The September violations were discussed in the previous inspection report dated October 29, 2012. You have since determined that the cause was a phenomenon known as Granular Activated Sludge which caused the sludge to rapidly settle to form a dense sludge blanket. The facility modified the clarifier to spray water at the bottom of the clarifier to improve the collection of the sludge to the sludge withdrawal pipe (see **Figure 1**). No additional comment is necessary.
2. The facility recently installed DO probes in the aeration portion of their Schreiber Units. The SCADA system has not been modified to collect data from the probes and as a result the blowers have operated constantly. The sludge is overoxidized as a result of the aeration (see **Figure 2**). My understanding is that it has been difficult to schedule the SCADA company to perform the necessary work. Regardless, **please inform me when the SCADA system has been upgraded.**
3. Overall, the plant appeared to be well operated and the effluent appeared well-treated at the time of the inspection.

Steven Smith, Manager
Canal Winchester WWTP
Page 2

Attached is the inspection checklist. **A response is requested regarding Finding 2.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.state.oh.us.

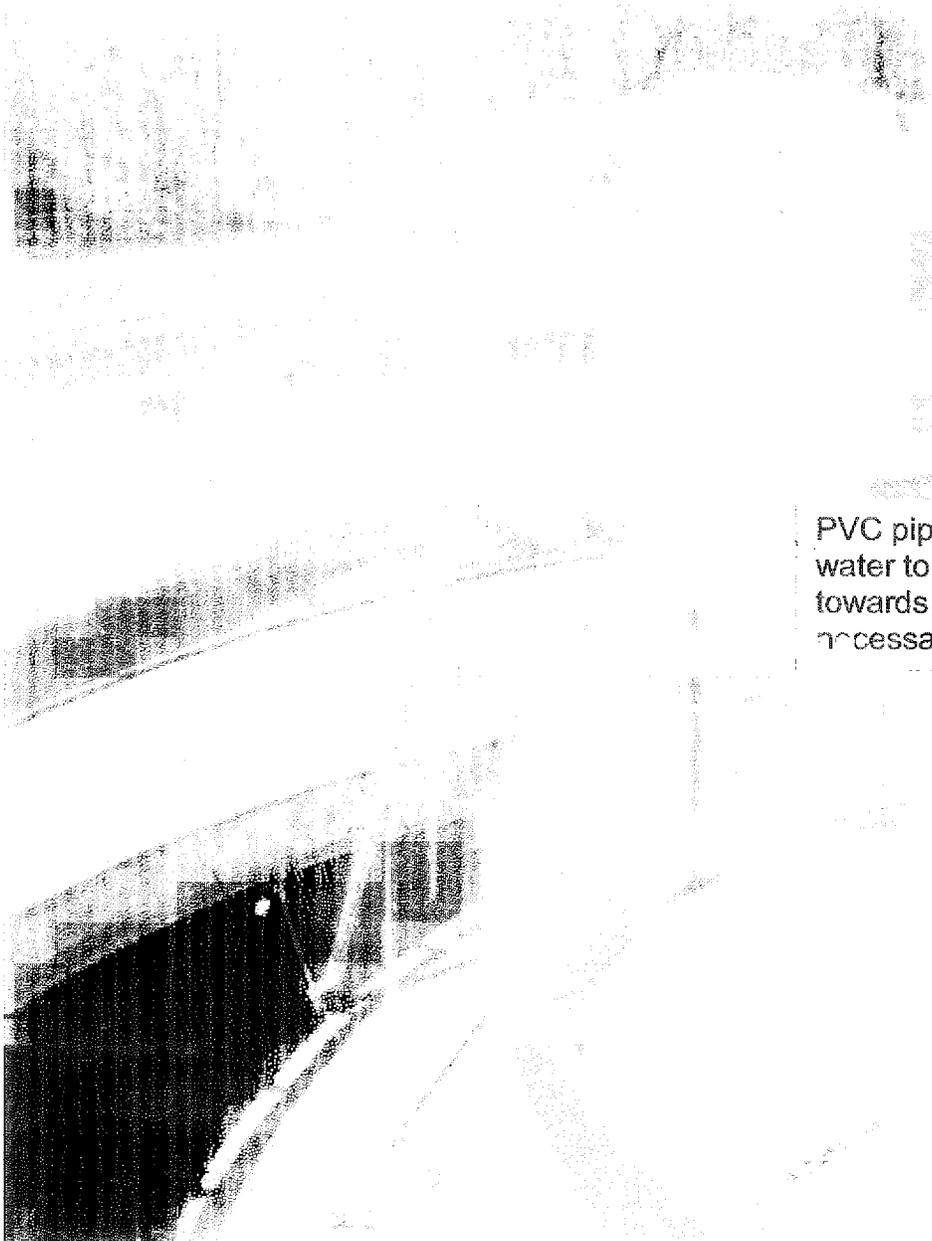
Sincerely

A handwritten signature in cursive script that reads "Cole Miller".

Cole Miller
Environmental Specialist II
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Cole Miller

CM/hsm Canal Winchester CEI 5-15-2013



PVC pipe which sprays water to push sludge towards middle when necessary.

Figure 1: Clarifier modification.

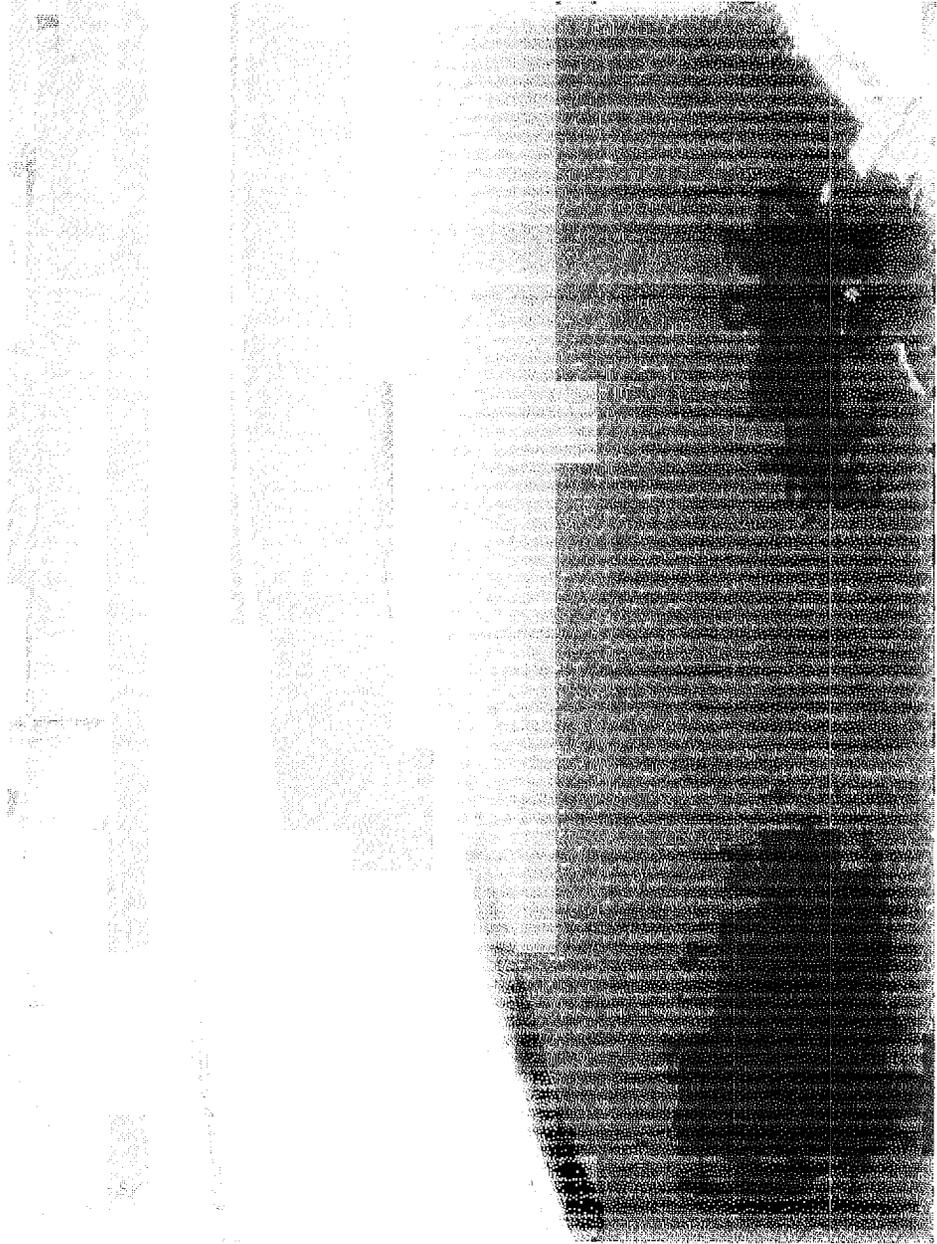


Figure 1: Overoxidized sludge.

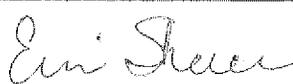
NPDES Compliance Inspection Report

SECTION A: GENERAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PB00012	OH0024333	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/15/2013	9:30 AM	11:00 AM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Canal Winchester WWTP	10/1/2008
	Permit Expiration Date
	6/30/2013
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Name and Title of Responsible Official	Phone Number
Steven Smith, Manager	(614) 834-5100

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	
S	Operations & Maintenance	Facility installed DO probes and is in the process of updating their SCADA system to provide better control.
S	Facility Site Review	
S	Collection System	
S	Flow Measurement	
S*	Receiving Waters	Facility had effluent violations in September but has since been compliant.
S	Laboratory	

Comments:

Signatures			
	5/21/13		5/22/13
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water District Office	Date

Compliance Report for Canal Winchester WWTP between 9/1/2012 to 4/1/2013

Summary

Permit Effluent Limit Violations: 10
 Permit Effluent Code Violations: 2
 Permit Effluent Frequency Violations: 0
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2012	001	Total Suspended Solids	30D Conc	12	13.0833	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	13.	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	12.7333	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	9.4	43.8663	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	14.1	44.5527	9/1/2012
September 2012	001	Total Suspended Solids	7D Conc	18	31.6666	9/8/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	19.8333	9/8/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	14.1	69.0712	9/8/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	18.6666	9/15/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	14.1	59.1078	9/15/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
September 2012	001	Fecal Coliform	AK	9/11/2012
September 2012	001	Fecal Coliform	AK	9/18/2012

Flow Data for Canal Winchester WWTP between 9/1/2012 and 4/1/2013

	Date	Flows (MGD)
Ten Highest Flows	3/18/2013	1.995
	3/6/2013	1.581
	3/7/2013	1.581
	3/19/2013	1.499
	1/30/2013	1.495
	12/20/2012	1.454
	3/8/2013	1.440
	3/25/2013	1.409
	3/20/2013	1.379
	3/11/2013	1.371
Average Flow Rate		1.063

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 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

SECTION E: COMPLIANCE

- (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) Permittee is meeting compliance schedule N/A

Comments:

The previous inspection detailed the violations in September 2012.

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? Stationary generator which is tested under stress
- (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: 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 N

Comments:

The facility installed new DO meters within the aeration tanks. However, the DO meters are not connected to SCADA which has resulted in the blowers being on constantly. The sludge is over oxidized as a result.

Mr. Smith uses time cards to demonstrate staffing requirements.

SECTION G: RECORD KEEPING

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

Comments:
 Operator of Record staffing requirements are managed using time cards.

SECTION H: COLLECTION SYSTEM

- a) Percent combined system:..... 0
- b) Any collection system overflows since last inspection..... N/A
 CSO SSO
- c) Regulatory agency notified of overflows..... N/A
- 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. N
- j) Any complaints received since last inspection of basement flooding Y*
- k) Are any portions of the sewer system at or near capacity N
- l) Are operations changed during high-flow events? N

Comments:
 One WIB was received in 2012.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP) last audited by Ohio EPA: N/E
 Audit Date:
- 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: Carl Wheeler
- 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 N/E
- h) Any complaints received last year regarding sludge N
- i) Is sludge adequately processed (digestion, pathogen control) Y

Comments:

The sludge amount has slightly increased since the Granular Activated Sludge issue occurred in September.

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained Y
 Type of device: Ultra sonic with flume
- b) Calibration frequency adequate Y
 Date of last calibration: 5/1/13
- 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 Annual
- 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

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
- c) Analysis performed more frequency..... Y*
 If yes, are results recorded in permittee's report? N*
- d) Commercial laboratory used:
 Name: MASI / Alloway
 Parameters analyzed: Metals, oils / grease, TDS, Total P, NO3 / NO2
- 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..... Y
 Date: 2012

Comments:
 Facility performs duplicate analysis on samples. The duplicates are not reported but the facility maintains the records of the samples.

Facility incorrectly identified hardness during the last DMR-QA. They have since performed adequate corrective actions.

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	Yes	

Comments:

SECTION III. 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: