



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

Re: **Notice of Violation**
Crestline WWTP
NPDES Permit 2PC00006
Compliance Evaluation Inspection
Crawford County

July 25, 2013

Mr. Marc Milliron
Safety-Service Director
Crestline WWTP
100 North Seltzer Street
Crestline, Ohio 44827

Dear Mr. Milliron:

On July 17, 2013, a Compliance Evaluation Inspection (CEI) was conducted at the Crestline wastewater treatment plant (WWTP). Mr. Mike Ritter, operator of the WWTP, and Ms. Michelle Sharp of the Ohio EPA 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.

The bypass to the flow equalization tanks was out of operation and the flow equalization tanks were empty. The mixed liquor in the counter current aeration tank had a healthy brown color. The plant is currently feeding alum at a rate of 300 lbs/day to remove phosphorous. There were some solids on the surface of the clarifiers, but they had a clear effluent. The effluent from the UV disinfection tank was clear.

Our review of the discharge monitoring reports covering the months of July 2012 through June 2013 for the Crestline WWTP found violations of the NPDES permit effluent limitations. The specific instances of non-compliance are enclosed.

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

Sincerely,

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

MS/jlm
Enclosures
pc: Mr. Mike Ritter, Crestline WWTP
ec: Michelle M. Sharp
Tracking

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2PC00006	OH0020664	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
7/17/2013	1:00 PM	2:00 PM	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Crestline WWTP 1000 Westgate Drive Crestline, Ohio 44827	5/1/2013
	Permit Expiration Date
	11/30/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Mr. Mike Ritter, Operator	419-683-2836
Name and Title of Responsible Official	Phone Number
Marc Milliron, Safety-Service Director	419-683-8900

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
M	Collection System
M	Flow Measurement
N	Receiving Waters
S	Laboratory

Comments:

Signatures	
<i>Michelle Sharp</i> 7/23/13	<i>Thomas Poffenbarger</i> 7/23/13
Michelle Sharp, 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 Crestline WWTP between 7/1/2012 to 7/1/2013

Summary

Permit Effluent Limit Violations: 38

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 7

Reported SSO Events: 1

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	001	Phosphorus, Total (P)	7D Conc	1.5	2.12	7/1/2012
July 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.615	7/1/2012
July 2012	001	Phosphorus, Total (P)	7D Conc	1.5	1.79	7/8/2012
August 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.664	8/1/2012
August 2012	001	Phosphorus, Total (P)	7D Conc	1.5	1.66	8/8/2012
August 2012	001	Phosphorus, Total (P)	7D Conc	1.5	1.92	8/15/2012
August 2012	001	Phosphorus, Total (P)	7D Conc	1.5	1.81	8/22/2012
September 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	0.8	2.1375	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	30D Qty	2.9	3.58359	9/1/2012
September 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.81	9/1/2012
September 2012	001	Phosphorus, Total (P)	30D Qty	3.6	4.63175	9/1/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	1.2	8.46667	9/8/2012
September 2012	001	Nitrogen, Ammonia (NH3)	7D Qty	4.3	14.11	9/8/2012
September 2012	001	Phosphorus, Total (P)	7D Conc	1.5	3.88	9/8/2012
September 2012	001	Phosphorus, Total (P)	7D Qty	5.4	6.46616	9/8/2012
September 2012	001	Phosphorus, Total (P)	7D Qty	5.4	6.86823	9/22/2012
October 2012	001	Phosphorus, Total (P)	30D Conc	1.0	1.24	10/1/2012
October 2012	001	Phosphorus, Total (P)	7D Conc	1.5	1.65	10/8/2012
October 2012	001	Dissolved Oxygen	1D Conc	5.0	4.5	10/29/2012
October 2012	001	Dissolved Oxygen	1D Conc	5.0	4.6	10/30/2012
December 2012	001	Dissolved Oxygen	1D Conc	5.0	4.	12/10/2012
January 2013	001	Dissolved Oxygen	1D Conc	5.0	4.8	1/30/2013
April 2013	001	Phosphorus, Total (P)	30D Qty	3.6	4.11483	4/1/2013
April 2013	001	Phosphorus, Total (P)	7D Qty	5.4	6.28524	4/8/2013
April 2013	001	Dissolved Oxygen	1D Conc	5.0	3.9	4/19/2013
April 2013	001	Phosphorus, Total (P)	7D Qty	5.4	6.13288	4/22/2013
April 2013	001	Dissolved Oxygen	1D Conc	5.0	3.5	4/23/2013
April 2013	001	Dissolved Oxygen	1D Conc	5.0	3.6	4/24/2013
April 2013	001	Dissolved Oxygen	1D Conc	5.0	3.2	4/25/2013
April 2013	001	Dissolved Oxygen	1D Conc	5.0	3.5	4/26/2013

April 2013	001	Dissolved Oxygen	1D Conc	5.0	3.2	4/29/2013
May 2013	001	Phosphorus, Total (P)	30D Qty	5.4	5.45945	5/1/2013
May 2013	001	Dissolved Oxygen	1D Conc	5.0	3.7	5/3/2013
May 2013	001	Phosphorus, Total (P)	7D Qty	8.1	16.1543	5/8/2013
June 2013	001	E. coli	30D Conc	161	486.141	6/1/2013
June 2013	001	E. coli	7D Conc	362	2420.	6/8/2013
June 2013	001	Dissolved Oxygen	1D Conc	5.0	4.8	6/13/2013
June 2013	001	E. coli	7D Conc	362	712.881	6/22/2013

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2012	001	Dissolved Oxygen	1/Day	1	0	7/4/2012
November 2012	001	Total Suspended Solids	3/Week	3	2	11/22/2012
November 2012	001	Nitrogen, Ammonia (NH3)	3/Week	3	2	11/22/2012
November 2012	001	CBOD 5 day	3/Week	3	2	11/22/2012
November 2012	001	Phosphorus, Total (P)	1/Week	1	0	11/22/2012
November 2012	601	Total Suspended Solids	3/Week	3	2	11/22/2012
November 2012	601	CBOD 5 day	3/Week	3	2	11/22/2012

Parameter	Units	Date	Reported Value
Overflow Occurrence	No./Month	6/13/2013	1

Flow Data for Crestline WWTP between 7/1/2012 and 7/1/2013

	Date	Flows (MGD)
Ten Highest Flows	5/9/2013	5.335
	4/13/2013	2.402
	1/12/2013	2.373
	10/30/2012	2.304
	11/1/2012	2.299
	10/31/2012	2.273
	6/14/2013	2.251
	1/31/2013	2.214
	3/12/2013	2.199
	1/14/2013	2.180
Average Flow Rate		0.914

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 N
- (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 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:

(b) Tried taking one bank of UV offline for savings in electric, put both banks online and cleaned bulbs. Increased blower for post air on 5/28/13.

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 Y
- (j) Operation and maintenance manual provided and maintained Y
- (k) Any plant bypasses since last inspection NA
- (l) Regulatory agency notified of bypasses NA
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection Y

Comments:

- (i) Idler when on counter current tank (11/20/12) Post aeration blower (4/12/13)

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book (i.e. computer log, hard bound book)
Log 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 N
- 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 Y
- 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 NE
- k) Are any portions of the sewer system at or near capacity Y
- l) Are operations changed during high-flow events? Y

Comments:

- (l) Returns are minimized during high flows.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP) last audited by Ohio EPA:
Audit Date: 12/15/11
- b) Sludge adequately disposed Y
Method: Landfill
- c) If sludge is incinerated, where is ash disposed of NA
- d) Is sludge disposal contracted Y
Name: Midwest Compost
- 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 Y
- i) Is sludge adequately processed (digestion, pathogen control) Y

Comments:

- d) Midwest Compost comes about once every 6 months to press sludge on their temporary press.
- h) Odor complaints from nearby neighborhood

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained Y
Type of device: Venturi Device location: Influent and Effluent
- b) Calibration frequency adequate NE
Date of last calibration: Can't be calibrated
- 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 1/Day
- 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? Y
- d) Commercial laboratory used:
 Name: Alloway/Enviroscience
 Parameters analyzed: All but pH and DO and Bioassay/Bioassay
- 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 NE
 Date:

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	NE	No	No	No	No	No	Clear	

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: