



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

September 26, 2012

RE: GENEVA CITY WWTP
GENEVA CITY, ASHTABULA COUNTY
OHIO EPA PERMIT 3PD00014
COMPLIANCE INSPECTION EVALUATION

Mr. Gary Hydinger, Superintendent
City of Geneva Wastewater Department
44 North Avenue West
Geneva, OH 44041

Dear Mr. Hydinger:

On September 25, 2012, a site inspection was conducted at the above referenced facility at 44 North Avenue West, City of Geneva, Ashtabula County. The inspection was conducted by John Schmidt of this office. Gary Hydinger, Plant Superintendent represented the City of Geneva on the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and in conjunction with the renewal of said permit. A reconnaissance inspection was also conducted of the City's industrial wastewater treatment program. The last compliance inspection was conducted on September 12, 2013.

The system consists of grit removal, raw sewage pump station, primary settling (clarifiers), rock trickling filters with recirculating pumps, final settling (clarifiers), nitrification towers with recirculation, rapid sand filtration, chlorine disinfection, and sulfur dioxide dechlorination. Alum is fed for phosphate control. Chlorine is added to the waste stream prior to rapid sand filtration to discourage biological growth in the rapid sand filters, and the chlorine contact tank is located following rapid sand filtration. Sludge management consists of primary and secondary settling tanks, primary digestion and secondary digestion in series, and dewatering with a belt filter press. Dried sludge is stored in an old sludge drying bed and sold as a Class A sludge. As a backup, sludge drying beds are available as an alternate to the belt filter press. The facility discharges to Cowles Creek adjacent to the west side of the facility. Generators provide backup power to the entire facility.

Observations and Notations

Following are observations and notations made during the inspection:

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Grit is containerized for disposal at a solid waste landfill.
2. The log book, copy of the permit, and maintenance records are maintained at the facility and found compliant with Ohio Administrative Code (OAC) 3745-7-09.
3. Alum is fed to aid in phosphorus control. Chemicals are supplied by USALCO.

4. The operation of the rock tricking filters was satisfactory. They are cleaned weekly.
5. Primary and secondary clarifier effluent troughs were very clean and there was no scum around the effluent baffle or the trough. Weirs and troughs are cleaned weekly.
6. One of the nitrification tower dosing pumps is currently out of service. Mr. Hydinger has a replacement pump on order and plans to replace the pump within the next two weeks.
7. The east nitrification tower was out of service for maintenance and the west tower was operating. The nitrification tower appeared to be operating as designed. Deteriorated concrete at the air inlet vents at the bottom of the towers has been repaired in the east tower, and the tower has been resealed. The east tower will be returned to service as soon as the concrete cures, and is expected to be made operational on October 1, 2013. The west tower will be similarly serviced in the summer of 2014.
8. An influent sluice gate has been replaced, providing more even loading to all three filters. Previously, one of the sand filters received more than the other two combined. The effluent discharged from the sand filters during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
9. Chemicals were noted in the chlorination and sulfur dioxide feed systems. The chlorine contact tank was operating as designed.
10. Influent and effluent composite samples are collected with a flow proportional sampler. The proper temperature was noted in the samplers.
11. The WWTP laboratory performs monitoring of CBOD, suspended solids, pH, phosphorus, chlorine, sulfur dioxide, dissolved oxygen, and ammonia nitrogen. Geneva contracts with NorthCoast Laboratories for volatile organic compounds (VOCs), metals, oil and grease, nitrate-nitrite, bacteria (E. Coli), and quality assurance samples from the WWTP laboratory. Whole effluent toxicity is performed by Envirosience Laboratories, and mercury sampling is conducted by Mercury One.
12. The final effluent was clear and was mixing well with the receiving stream. The discharge was clearer than the receiving water upstream of the discharge.

NPDES Permit Compliance Review

A review of the electronic Discharge self-Monitoring Reports (eDMRs) received by Ohio EPA for the period September 1, 2012 through September 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following apparent limit violations are noted for the time period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	.51	5/30/2013
001	01119	Copper, Total Recoverable	30D Conc	17.0	22.	8/1/2013

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any effluent violations, along with measures taken to ensure that they are not repeated. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>.

Ohio EPA received an explanation for the May 2013 chlorine residual violation on May 30, 2013, and was attributed to operator error. Geneva stated that when changing back-up tanks of sulfur dioxide, operators failed to follow procedure to ensure all valves were in proper position. When lead tanks emptied, transfer tanks were not available because a valve had been left closed. As a reasonable explanation has been provided and steps have been taken to ensure that it is not repeated, no further information is needed to respond to the violation.

Ohio EPA does not consider the copper effluent apparent violation an actual violation. Geneva's current permit requires only monitoring for the August 2013 reporting month, and should not have monitoring limits. Ohio EPA attributes the error to an internal error in the SWIMS program and is currently working to correct the error. Geneva did notify Ohio EPA of the error on September 20, 2013.

Reporting Violations

A reporting violation occurred on April 3, 2013. When sampling is required at Stations 001, 601, and 901, Part II, Item N requires that when sampling is required of all three sample locations that the sampling must be conducted the same day. Downstream (Station 901) sampling of temperature, pH, and dissolved oxygen was not collected on the same days as Stations 001 and 601. This was attributed to operator error and unfamiliarity with the requirements of issued NPDE Permit 3PD00014*QD. As a reasonable explanation has been provided and steps have been taken to ensure that it is not repeated, no further information is needed to respond to the violation.

Compliance Schedule

No compliance schedule violations were noted for the period reviewed. Your NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
5/1/2013	7/31/2013	5/1/2015	Incomplete	15099	Construction	Feasible Alts Bypass Report
5/1/2013	7/31/2013	5/1/2014	Incomplete	-----	Construction	E Coli Status Report
5/1/2013	7/31/2013	5/1/2015	Incomplete	05699	Construction	Final Limits Compliance
5/1/2013	7/31/2013	9/1/2013	8/9/2013	52599	Pretreatment	Tech Justification Report Cu
5/1/2013	7/31/2013	9/1/2013	8/9/2013	52599	Pretreatment	Tech Justification Report Hg
5/1/2013	7/31/2013	11/1/2013	Incomplete	53199	Pretreatment	IPP Mods for IPP Rules

As completed milestones have been met by the timeframes prescribed by your permit and incomplete milestones have not yet passed, no further information is needed.

SSO Reporting

The 2012 SSO report was received on February 6, 2013. No SSOs were reported for 2013, with no occurrences of basement backup reported.

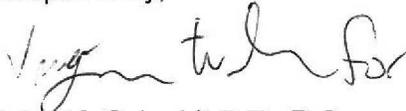
Industrial Pretreatment Program

A limited scope pretreatment program inspection was conducted by completing the reconnaissance inspection checklist. Geneva anticipates submitting revisions to its enforcement response plan and to update the program for streamlining as specified by its NPDES per Ohio EPA comments from the 2010 audit as outlined in the October 27, 2010 letter by November 1, 2013. The SIU list is limited only to Nordic Air. Geneva has inspected its SIU in 2012 and 2013. No septage is accepted.

Geneva has had one instance of oil and grease interference from a contractor working at the closed Geneva Tru-Temper Geneva facility. The contractor should have obtained an IU permit and Geneva cited the contractor for failure to obtain a permit. Plant personnel took evasive action at the plant, and no Geneva WWTP effluent violations were noted from the incident.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

ec: Donna Kniss, Ohio EPA, DSW, NEDO

File/Municipal/Geneva City WWTP (Ashtabula Co.)/PC