



**Environmental  
Protection Agency**

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

Re: Crawford County  
City of Crestline WWTP  
NPDES Permit

December 15, 2011

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

Dear Mr. Milliron,

On November 22, 2011, an inspection of the City of Crestline Wastewater Treatment Plant (WWTP) was conducted. Ohio EPA representatives, Ms. Michelle Sharp and Mr. Andrew Gall, met with Mr. Mike Ritter. The inspection included a tour of the facility and completion of a checklist designed to evaluate the major areas of the treatment plant. Our inspection findings and recommendations are summarized below.

The mixed liquor in the counter current aeration tank was a healthy brown color. The effluent from the UV disinfection tank was clear. The equalization tanks were in use and being aerated.

Our review of the discharge monitoring reports covering the months of September 2010 through October 2011 for the Crestline WWTP found violations of the National Pollutant Discharge Elimination System (NPDES) permit effluent limitations. The specific instances of noncompliance are enclosed. The facility remains on the significant non-compliance (SNC) list for its phosphorous violations. In October, Mr. Keith Kroeger from Ohio EPA's Compliance Assistance Unit was out to help determine the cause of these violations. It is believed that the high amount of solids in the plant is causing phosphorous levels to remain high. It is hoped that future improvements to the sludge handling process at the plant will also help reduce the phosphorous levels.

Our completed inspection forms are enclosed for your review. If you have any questions, please contact Michelle Sharp at 419-373-3019.

Yours truly,

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

MS/jlm  
Enclosures  
pc: Mike Ritter, Crestline WWTP  
ec: Inspection Tracking



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PC00006	OH0020664	11/22/2011	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Crestline WWTP 100 Westgate Drive Crestline, Ohio 44827	2:00 PM	8/1/2004
	Exit Time	Permit Expiration Date
	3:00 PM	7/31/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Mike Ritter	419-683-2836	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council City of Crestline 100 North Seltzer Street Crestline, Ohio 44827	419-683-3800	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	M	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
U	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)			
Inspector		Reviewer	
<i>Michelle Sharp</i>	12-15-11	<i>Thomas Poffenbarger</i>	12/7/11
Michelle Sharp Environmental Specialist II Division of Surface Water Northwest District Office	Date	Thomas Poffenbarger, P.E. Water Quality Engineer Division of Surface Water Northwest District Office	Date

Permit # :  
NPDES #:

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..... N
- (i) Number and location of discharge points are as described in permit..... N

Comments/Status:

(h & i) The City has recently discovered an additional six overflows within the collection system.

**Section F: 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) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

(a/b) Phosphorous violations continue. In October, Keith Kroeger visited the plant and it is thought that there are too many solids in the plant, which is causing the violations. There may be some sludge improvements in the future to address this issue.

Permit # :  
NPDES #:

**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: IV
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/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..... 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

**Record Keeping:**

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

Binder and time cards
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- (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..... N/A
  - 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)... N/A
  - 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

Permit # :  
NPDES #:

**Section G: Operation & Maintenance (con't)**

**Collection System:**

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... Y  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... Y
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... Y
- (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..... Y

**Comments/Status:**

Permit # :  
NPDES #:

### 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: Land Apply)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... N  
(Name:                      )
- (f) Has amount of sludge generated changed significantly since  
last inspection..... N
- (g) Adequate sludge storage provided at plant..... N
- (h) Land application sites monitored and inspected per SMP..... Y
- (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)..... Y

**Comments/Status:**

### 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 ..... N  
(Date of last calibration:                      )
- (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:**

(b) Due to the design the meter cannot be calibrated because it can't be bypassed.

Permit # :  
NPDES #:

**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  
(see GLC page 5 and 8)
- (d) 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

**Laboratory:**

*General*

- (a) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite? Y
- (b) Do SOP's include the following if applicable:
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and Preservation
  - Interferences
  - Apparatus and Materials
  - Reagents
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

Note: SOP's are required per Standard Methods 1020A and states "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results."

- (c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y

*Quality Control/Quality Assurance*

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. Y  
(see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory

Permit # :  
NPDES #:

Date:

- (j) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab:

Lab name:

**Comments/Status:**

Alloway: Everything but DO and pH  
Enviroscience: Bioassay  
Plant: pH and DO

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	Not Observed	No	No	No	No	No	Clear	

**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?

Permit # :  
NPDES #:

**Comments/Status:**

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Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
9/1/2010	001	00665	Phosphorus, Total (P)	30D Conc	1.0	2.4305
9/1/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.291
9/8/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.166
9/15/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.831
9/22/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.434
10/1/2010	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.659
10/8/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.065
10/15/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.044
11/1/2010	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.8
11/1/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.302
11/8/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.794
11/22/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.804
12/1/2010	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.3
12/1/2010	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.74
12/1/2010	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.46167
12/1/2010	001	00665	Phosphorus, Total (P)	7D Qty	5.4	16.5115
1/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.01025
2/28/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	3.4
3/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	4.42144
3/8/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.91488
3/10/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.4
4/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.4908
4/1/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.326
4/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	8.81404
4/1/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	14.5495
4/15/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.18154
5/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.3225
5/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	6.65932
5/1/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	5.7336
5/3/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.4
5/5/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.5
5/8/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.589
5/15/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.743
5/15/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	9.48751
5/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.59445
5/26/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	3.8
6/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.89
6/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	4.43728
6/8/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.66
6/9/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6
6/10/2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.9
6/15/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.73
6/22/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.69
6/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.19146
7/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	2.258

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
7/1/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.915
7/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.7182
7/15/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.719
7/15/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	10.9644
7/22/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.961
7/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	5.66309
8/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.8275
8/1/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.67
8/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	5.83994
8/8/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.57
8/15/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.79
8/22/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.28
8/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	11.1264
9/1/2011	001	00610	Nitrogen, Ammonia (NH3	30D Conc	0.8	1.06231
9/1/2011	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.2	2.20667
9/1/2011	001	00610	Nitrogen, Ammonia (NH3	7D Qty	4.3	6.50469
9/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.405
9/1/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.41
9/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	4.44888
9/8/2011	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.2	2.32333
9/8/2011	001	00610	Nitrogen, Ammonia (NH3	7D Qty	4.3	5.1494
9/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.27347
10/1/2011	001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.235
10/1/2011	001	00665	Phosphorus, Total (P)	30D Qty	3.6	6.65917
10/15/2011	001	00530	Total Suspended Solids	7D Qty	65	74.3610
10/15/2011	001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.71
10/15/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	13.4592
10/22/2011	001	00665	Phosphorus, Total (P)	7D Qty	5.4	6.35698