



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 05/02/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Wastewater Treatment
Facility Name: Erie Wastewater Treatment Plant
Permittee(s): Erie City
Facility Operator: Erie City Sewer Authority
Permittee Address: 68 Port Access Road, Erie, Pennsylvania 16507-2202
Facility Address: 68 Port Access Road, Erie, Pennsylvania 16507-2202
Facility Latitude: 42.141850
Facility Longitude: -80.077239
County/Parish: Erie County
Permit No: PA0026301
NAICS Code: 221320
SIC: 4952
Unique Project #: 3E23WN045A

Facility Representative(s)*:

Point of Contact

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*Additional representatives listed in Table 1 below

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Date

Unique Project#: 3E23WN045A

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I. Introduction

On May 2, 2023, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team” or “Inspectors”) conducted a municipal wastewater inspection of the Erie City Wastewater Treatment Plant (WWTP). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PA0026301 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the site at approximately 8:00 AM. A representative from the Erie County Department of Health (ECDH) was in attendance. The following inspectors and representatives were present for the inspection:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Steve Maslowski	EPA Region III	(215) 814-2371	maslowski.steven@epa.gov
Allison Gieda	EPA Region III	(304) 234-0232	gieda.allison@epa.gov
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Basil Ronzitti	City of Erie Wastewater Bureau Chief	814-870-1364	bronzitti@erie.pa.us
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Nick Milane	Maintenance Supervisor	814-450-2572	nmilane@erie.pa.us
State or County Representatives			
Shane Krause	Erie County Department Health	814-460-0352	c-skrause@gov.pa

Steve Maslowski, Allison Gieda, and Angela Weisel displayed their credentials to the site representatives at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in [Attachment 1](#).

B. Weather and Precipitation Conditions:

During the inspection, weather was rainy with strong gust of winds. The closest National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the week of the inspection is provided in Table 2 below.

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Erie International Airport	5/1/2023	0.19
Erie International Airport	5/2/2023	0.5
Erie International Airport	5/3/2023	0.32
Erie International Airport	5/4/2023	T
Erie International Airport	5/5/2023	T

II. Facility Activity

The Erie WWTP is permitted for an average daily flow rate of 68.6 million gallons per day (MGD) and is a secondary treatment facility (activated sludge) incorporating phosphorus removal. The WWTP treats both domestic and industrial wastewater. The WWTP was originally designed to treat municipal and paper mill waste from Hammermill's (later International Paper) Erie production facility and did so until June 2002, when the paper mill closed.

Wastewater enters the WWTP at two headworks facilities, the East Headworks and West Headworks. The headworks facilities include coarse mechanical screening equipment and aerated grit chambers. Debris removed from the screening and grit equipment removed at the headworks facilities are discharged into dumpsters and disposed at a sanitary landfill. New screening equipment and grit removal equipment was installed in the West Headworks in 2021 and installed in the East Headworks in 2023.

Wastewater from the headworks facilities flows by gravity to a flow distribution splitter structure. The flow distribution splitter structure is used to distribute flow to the two sets of primary clarifiers operated in parallel. The west primary clarifiers consist of two rectangular tanks (with circular collectors) and the east primary clarifiers consist of eight rectangular tanks. Flow distribution to the two primary clarifiers is regulated by several gates. The flow distribution splitter structure also regulates excess wet weather flows discharged to the WWTP's Overflow Retention Facility (ORF).

Sludge collected in the primary clarifiers is removed by three sets of primary sludge pumps. Two sets serve the east primaries and are in the gallery at the south end of the east primary clarifiers, and one set serving the west primaries is in the basement of the West Primary Building. Each primary sludge pump is a positive displacement progressing cavity type pump and is equipped with a variable frequency drive. The primary sludge pumps discharge the sludge and scum to the sludge mixing tank.

Effluent from the primary clarifiers flows by gravity to the aeration tanks. The aeration tanks are operated in parallel as a conventional, plug flow, activated sludge process. Each aeration tank has four passes and is equipped with floor-mounted, nine-inch diameter, fine-bubble ceramic diffusers arranged in a grid pattern. The effluent from the aeration tanks flows by gravity to two sets of final clarifiers, which are operated in parallel. The west final clarifiers (No. 1 through No. 6) are octagonal shaped. The east final clarifiers (No. 7 through No. 10) are circular.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

Sludge that settles in the final clarifiers is removed by a system of 12 Return Activated Sludge (RAS) pumps, each equipped with a variable frequency drive (VFD). Four RAS pumps located in the Blower Building basement serve the east final clarifiers. Two sets of RAS pumps (four pumps per set) serve the west final clarifiers – one set of four RAS pumps is in the basement of the West Gallery Building and the second set for four RAS pumps is in the basement of the East Gallery Building. Three of the twelve RAS pumps were recently replaced. Return sludge flows by gravity from the return sludge channel to the aeration tanks.

The effluent from the final clarifiers is disinfected using a chlorine solution made with chlorine gas before discharging to Lake Erie through a 72-inch diameter and a 90-inch diameter outfall pipeline. The detention time in the two outfall pipelines provide the required chlorine contact capacity without the need for a dedicated chlorine contact tank.

III. Observations

The inspection observations below are made pursuant to the requirements of the Permit. Photographs were taken during the inspection by Angela Weisel and are provided in Attachment 2.

Facility Operation

Erie is the 4th largest city in the Commonwealth of Pennsylvania, with an approximate population of 90,000 people. The service population, which includes the satellite systems, is approximately 200,000 people. The Authority owns the Erie WWTP, and the City of Erie has deeded to the Authority the East Side Interceptor and West Side Interceptor. The City, via a lease agreement with the Authority, is responsible for maintaining and operating the interceptors, the WWTP and the outfalls, and is responsible for collecting revenues to pay for operation, maintenance, and debt service. Retail customers are billed based on metering flow. There are agreements with the customer municipalities that date back to the 1950s. The tributary communities to the Erie WWTP are owned, operated, and maintained by eight municipalities or their associated municipal utility authorities, as follows:

- City of Erie (through the City's Department of Public Works, Property, and Parks/Bureau of Sewers)
- Millcreek Township (Millcreek Township Sewer Authority). The Millcreek Township system also includes the conveyance of flows from the neighboring Greene Township, as further discussed below.
- Lawrence Park Township
- Wesleyville Borough
- Harborcreek Township (Harborcreek Township Sewer Authority)
- Summit Township (Summit Township Sewer Authority)
- Fairview Township (Fairview Township Sewer Authority)
- Greene Township

Currently, the WWTP is undergoing upgrades that will last through 2028 for \$33 million. According to Basil Ronzitti, Bureau Chief, the plant is old and needs to be upgraded. The new headworks' openings in the bar screen were upgraded from 1" to ½". The headworks upgrades

are approximately \$11 million, including new bar screens, new grit chamber, structural improvements in primary/secondary, boiler, ancillary improvements, and chlorine improvements. The chlorine rehabilitation is on hold for financial reasons.

The plant is designed for 68.6 MGD, with a 40 MGD daily flow and a maximum flow of 200 MGD. There are 60 employees and a certified laboratory (“lab”). The collection system division employs four workers and two managers. At the plant there are three shifts, 24/7, at times of 6:30 AM – 2:30 PM, 2:30 PM – 10:30 PM, 10:30 PM – 2:30 AM. Maintenance is performed during the hours of 7 AM – 3:00 PM, Monday through Friday. The yearly budget for the WWTP is \$28 million.

The Erie NPDES Permit No. PA0026301 became effective June 22, 2016, and expired June 30, 2018. The permit has been administratively extended. The most recent permit application was submitted in 2017.

III. Observations:

Facility Walkthrough

As part of the inspection process, the EPA Inspection Team visually observed the treatment train and site conditions in the presence of the Erie wastewater staff (Refer to Attachment 2, Photographs 1 through 152). The EPA Inspection Team started its walk through the WWTP at 9:20 AM. The EPA Inspection Team first observed the Mill Creek Tube, a 96-inch diameter tunnel that discharges adjacent to the WWTP within the fence of the 22-acre site. Four active CSO outfalls discharge into the Mill Creek Tube. There was no CSO outfall sign at the opening of the Tube (Refer to Attachment 2, Photographs 4 through 8).

The next observed area was the West Headworks. The EPA Inspection Team observed that there are gates that control the flow to the east vs. west headworks (Refer to Attachment 2, Photographs 9 through 18). The Headworks has new bar screens and grit removal. According to Nick Milane, Maintenance Supervisor, they are working on a preventive maintenance and operation and maintenance Standard Operating Procedure (SOP) for the new headworks. The maintenance crew does daily walk arounds of mostly shut down check list. Facility representatives perform daily, weekly, monthly, quarterly, and semi-annual inspections. Inspections may include the following:

- Daily inspections include walking through and looking for vibrations
- Monthly inspections include shutting down bar screens and inspecting them
- Quarterly inspections include greasing the bearings
- Semi -annual inspections and power washing

The EPA Inspection Team observed three 55-gallon drums of hydraulic oil used to provide O&M for the equipment (Refer to Attachment 2, Photographs 19 and 20). The facility representatives stated that the east headworks receives more grease. East headworks is

comprised of three bar screens, and three compactors. East headworks was offline at the time of the inspection.

There are two main interceptors coming into the plant. The largest of the two of is 72-inches. The West primary receives 26 MGD and diverts flow to the East Primary tanks. The EPA Inspection Team observed the gate that feeds the ORF.

The EPA Inspection Team observed flow into the west primary was 17 MGD (Refer to Attachment 2, Photographs 42 and 43). There are eight east primary tanks in total, one was down at the time of the inspection. Each tank has a capacity of 10 MG.

The EPA Inspection Team observed solids and sludge on two west primary tanks (Refer to Attachment 2, Photographs 36 through 41). Basil Ronzitti stated that tanker trucks bring in grease and septic haulers discharge into a manhole on East Bay drive, which contributes to the oil and grease problems at the WWTP.

The EPA Inspection Team observed influent sampler with tubing clogged with grease (Refer to Attachment 2, Photographs 47 through 49). The Inspection Team observed grease and oil in the east primary tanks (Refer to Attachment 2, Photographs 61 through 63 and 68).

The EPA Inspection Team observed the solids incinerators process. The facility adds polymer to thicken the sludge and centrifuge weekly (Refer to Attachment 2, Photographs 72 through 74). Water from the incinerator scrubber cannot have a pH lower than 5.9. See Photograph 50 in Attachment 2 for a view of the air scrubber wash water flowing into the east primary tanks. According to Basil Ronzitti, the facility is not meeting cadmium air limits for Incinerator One.

The Inspection Team observed the Chlorine Room where three, 1-ton cylinders were currently being used (Refer to Attachment 2, Photograph 76). The Chlorine Room is not vented to the outside. There was a total of nine full cylinders on site.

The Inspection Team observed the aeration tanks. There are 10 aeration tanks with 90 MGD capacity. The Inspection Team observed debris, trash, and grease in the aeration tanks. The weirs appeared to be filled with algae. There were dead channels adjacent to aeration tanks that were not used to treat wastewater filled with algae and weeds (Refer to Attachment 2, Photographs 78, 79, 90, & 91). According to the operator, each tank is taken down yearly for O&M and cleaning.

The Final Clarifiers were observed by the Inspection Team. There are 10 in total, six circular and four rectangular tanks. Tank 4 was not in service for O&M (Refer to Attachment 2, Photograph 96). Algae growth was observed on the weirs in the final clarifiers (Refer to Attachment 2, Photographs 99, 102, 103, 104, 107, & 108).

After the Final Clarifiers, the flow from Junction Box 1 flows to Junction Box 2. A flow proportional composite sampler is used to pump back to the lab to collect the composite samples.

Erie has had 31 effluent violations, 10 of which were *fecal Coliform*

Facility representatives stated that the *fecal Coliform* violations were the result of accumulation in the line caused by debris in the collection line between the north side of Port Access Road to the lab. (Refer to Attachment 2, Photographs 114 through 120). Basil Ronzitti stated they have

changed the SOP for cleaning the sampling line. Facility representatives stated that Canadian Geese comingling around the effluent sampling area could also be the reason for *fecal Coliform* effluent violations. The Facility has started cleaning this line more often and ensuring that the sampler is cleaned.

The EPA Inspection Team broke for lunch and upon return observed the ORF. The WWTP influent flows that exceed approximately 90 MGD are diverted and temporarily stored in three, 2-million-gallon tanks (Refer to Attachment 2, Photographs 121 through 125). The ORF wastewater is pumped to the influent channels of the east primary clarifiers when high flows subside. According to Basil Ronzitti, during sustained high flows that exceed the storage capacity of the ORF, the overflow from the ORF receives primary treatment and removal of solids and floatables and is disinfected prior to discharge to Lake Erie. At the time of the inspection, the ORF flow meter was out of service. Based on information in Erie's 2022 Chapter 94 Report (Refer to Attachment 3), in 2021, there were 21 days when the ORF was full, and the excess flow was chlorinated (Refer to Attachment 2, Photographs 126 through 128) and blended with the plant effluent and discharged through Outfalls 001 and 001A. In 2022, the ORF discharged 21 times for a total volume of 6.781 million gallons (Refer to Attachment 3).

- February 17, 2022 – 0.663 MGD released
- February 18, 2022 – 0.53 MGD released
- February 19, 2022 – 0.20 MGD released
- February 21, 2022 – 0.20 MGD released
- February 22, 2022 – 0.53 MGD released
- February 23, 2022 – 0.53 MGD released
- February 24, 2022 – 0.53 MGD released
- February 25, 2022 – 0.18 MGD released
- March 7, 2022 – 0.15 MGD released
- May 21, 2022 – 0.01 MGD released
- July 25, 2022 – 0.088 MGD released
- September 5, 2022 – 0.08 MGD released
- September 26, 2022 – 0.20 MGD released
- September 27, 2022 – 0.51 MGD released
- September 28, 2022 – 0.71 MGD released
- October 13, 2022 – 0.40 MGD released
- October 19, 2022 – 0.22 MGD released
- October 20, 2022 – 0.38 MGD released
- November 11, 2022 – 0.29 MGD released
- November 12, 2022 – 0.18 MGD released
- November 30, 2022 – 0.20 MGD released

The ORF after disinfection can also be discharged from Outfall 002 (submerged) into Mill Creek (Refer to Attachment 2, Photographs 129 through 133). Basil Ronzitti stated that Erie has never used the chlorine contact chamber for the ORF, and they have never discharged from Outfall 002 into Mill Creek. Outfall 002 is only to be used during catastrophic events.

The Inspection Team observed the solids handling facility. Erie uses a polymer C3111 (cationic polymers) to help settle out solids (Refer to Attachment 2, Photographs 134 and 135). Recycled water goes to a settled waste chamber (Refer to Attachment 2, Photographs 136 through 144). Tanks 2 and 4 were out of service at the time of the inspection. According to Basil Ronzitti, they hope to get them fixed in three months. The pumps that send solids to the centrifuge were out of order at the time of the inspection (Refer to Attachment 2, Photographs 2 and 3).

The EPA Inspection Team observed the Laboratory. Flow is pumped from Port Access Road to the lab by a flow proportional sampler (Refer to Attachment 2, Photographs 146 through 149). *fecal Coliform* samples are collected by grabbing off the top of the sampler. The laboratory samples and analyzes the following: phosphate, COD, CBOD, BOD, pH, ammonia, TSS, metals, cyanide, oil, and grease (Refer to Attachment 2, Photographs 150 through 157). Mercury samples are sent out and to Microbac Laboratory for priority pollutants analysis. The facility is not aware of any PCB issues. pH samples are taken from the effluent sample and analyzed within 15 minutes. There are three staff members, one supervisor, and pretreatment staff which can be used if short staffed. The facility has not conducted a headwork analysis recently.

NPDES Permit Effluent Exceedances

Part A.1.A of the Permit defines effluent discharge limitations, monitoring, and reporting requirements for Outfall No. 001 and 001A. Permit citation: “Based on the anticipated wastewater characteristics and flows described in the permit application and its supporting documents and/or amendments, the following effluent limitations and monitoring requirements apply.”

Observation 1. According to ECHO effluent data, the Erie City WWTP has had 31 effluent violations between February 2018 and September 2022 (Refer to Table 3). Basil Ronzitti states that the 10 *fecal Coliform* violations were related to a dirty sample line from the pump to the lab. The Facility did not provide an explanation about the other 15 effluent violations.

Table 3: Effluent Violations from February 2018 to September 2022

Monitoring Period Date	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value
2/28/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00771	mg/L	0.004
2/28/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.090702948	kg/d	0.04988662
2/28/2018	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.22675737	kg/d	0.07709751
2/28/2018	Coliform, fecal general	GEO MEAN	8	CFU/100mL	2000
2/28/2018	Coliform, fecal general	INST MAX	2419.6	CFU/100mL	10000
3/31/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00457	mg/L	0.004
3/31/2018	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.090702948	kg/d	0.07709751
7/31/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00401	mg/L	0.004
9/30/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00508	mg/L	0.004

Monitoring Period Date	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value
12/31/2018	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.090702948	kg/d	0.07709751
2/28/2019	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.090702948	kg/d	0.07709751
2/28/2019	Coliform, fecal general	INST MAX	4839.2	CFU/100mL	10000
2/28/2019	Coliform, fecal general	GEO MEAN	458	CFU/100mL	2000
3/31/2019	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.136054422	kg/d	0.07709751
3/31/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.006	mg/L	0.004
3/31/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.090702948	kg/d	0.04988662
4/30/2019	Copper, total (as Cu)	MO AVG	0.1412	mg/L	0.012
4/30/2019	Copper, total (as Cu)	MO AVG	2.267573696	kg/d	0.15873016
4/30/2019	Copper, total (as Cu)	WKLY AVG	9.523809524	kg/d	0.23582766
4/30/2019	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.272108844	kg/d	0.07709751
4/30/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.181405896	kg/d	0.04988662
4/30/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.025	mg/L	0.004
2/29/2020	Coliform, fecal general	INST MAX	2419.6	#/100mL	10000
2/29/2020	Coliform, fecal general	GEO MEAN	10	#/100mL	2000
10/31/2020	Coliform, fecal general	GEO MEAN	16	#/100mL	2000
10/31/2020	Coliform, fecal general	INST MAX	2419.6	#/100mL	10000
5/31/2022	Solids, total suspended	WKLY AVG	46	mg/L	45
5/31/2022	Solids, total suspended	WKLY AVG	812.6984127	kg/d	595.918367
7/31/2022	Coliform, fecal general	INST MAX	2419.6	#/100mL	2000
9/30/2022	Solids, total suspended	WKLY AVG	837.1882086	kg/d	595.918367
9/30/2022	Coliform, fecal general	INST MAX	2419.6	#/100mL	2000

Proper Operation and Maintenance

Part B.1.E of the permit states:

1. The permittee shall employ operators certified in compliance with the Wastewater Systems Operators Certification Act (63 P.S. §§1001-1015.1).

2. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and

maintenance include, but is not limited to, adequate laboratory controls including appropriate quality assurance procedures. This provision also includes the operation of backup or auxiliary facilities or similar systems that are installed by the permittee, only when necessary to achieve compliance with the terms and conditions of this permit. (40 CFR 122.41(e)).

Observation 2. The EPA Inspection Team observed several occurrences of solids and sludge accumulation on the weirs in the West Primary Clarifiers. At the time of the inspection, the operator stated that these were due to a past rain events. (Refer to Attachment 2, Photographs 36 through 40).

Observation 3. The EPA Inspection Team observed several occurrences of solids, sludge, oil, and grease in the East Primary Clarifiers. (Refer to Attachment 2, Photographs 61, 62, 63, 65, 66, 67, and 68).

Observation 4. The EPA Inspection Team observed several occurrences of algae, weeds, solids, and trash in the Aeration Tanks. (Refer to Attachment 2, Photographs 77, 78, 81, 84, 89, 90, and 91).

Observation 5. The EPA Inspection Team observed several occurrences of algae, weeds, solids, and growth on the weirs in the Final Clarifiers. (Refer to Attachment 2, Photographs 99, 102, 103, 104, 107, and 108).

Observation 6. The EPA Inspection Team observed influent sampler with tubing clogged with grease (Refer to Attachment 2, Photographs 47 through 49). The Inspection Team observed grease and oil in the east primary tanks (Refer to Attachment 2, Photographs 61 through 63 and 68).

Observation 7. Tanks 2 and 4 in the solids handling facility were out of service at the time of the inspection. The pumps that send solids to the centrifuge were out of order at the time of the inspection (Refer to Attachment 2, Photographs 2 and 3).

Overflow Retention Facility (ORF)

MAXIMIZING TREATMENT AT THE EXISTING WWTP

Part C. II. of the Permit states, *“a CSO-related bypass of the secondary treatment portion of the POTW treatment plant is authorized only when (1) the permittee is implementing Nine Minimum Controls and a Long Term Control Plan and the bypass is part of the operational plan for implementing Nine Minimum Controls and the Long Term Control Plan, (2) it is in accordance with the provision of 40 CFR 122.41 (m), and (3) the flow rate to the POTW treatment plant, as a result of a precipitation or snow-melt events, exceeds * MGD. Bypasses that occur when the flow at the time of the bypass is less than the above specified flow rate are not authorized under this condition.*

** For Outfall 002:*

- The permittee is required to maximize municipal flows through the main treatment plant at all times.*
- The flowrate (domestic and stormwater) to the main treatment plant, as a result of a precipitation event, exceeds the target flow of 90 MGD.*

- The ORF shall be filled to its' maximum capacity.
- The flowrate out of the ORF through Suboutfall 201 exceeds 60 MGD.
- The permittee shall provide notice to the Department of the bypass within 24 hours of occurrence of the bypass.

**[It is recognized in accordance with Part B.1.F(1) that there may be occasions when it is necessary to divert flows from the treatment plant through Suboutfall 201 and/or Outfall 002 at flows less than the target flow of 90 MGD as a result of maintenance or to assure efficient operations. In such events the permittee must demonstrate that effluent limitations have not been violated and include the reason(s) for such a bypass as part of the monthly DMR report.]*

*In the event of a CSO-related bypass authorized under this condition, the permittee shall minimize the discharge of pollutants to the receiving water. At a minimum, the CSO-related bypass flows must receive **primary clarification**, solids and floatables removal, and disinfection. The bypass may not cause the effluent from the POTW either to exceed the effluent limits contained in its permit or to cause or contribute to a violation of water quality standards. The permittee shall report any substantial changes in the volume or character of pollutants being introduced into the POTW or that may be present in the CSO-related bypass. Authorization of CSO-related bypasses under this provision may be modified or terminated when there is a substantial change in the volume or character of pollutants being introduced to the POTW or in the bypassed flow. The permittee shall provide notice to the permitting authority of bypasses authorized under this condition within 24 hours of occurrence of the bypass" (See Attachment 1, NPDES Permit)."*

Observation 8. The EPA Inspection Team observed that influent flow into the WWTP receives solids and floatable removal through the plant's headworks, but there was no primary treatment in the ORF. According to the WWTP Evaluation and Capacity Analysis (Refer to Attachment 5), the ORF must provide primary treatment. The EPA observed, at best, additional settling in the ORF, but there was no mechanical treatment that you would see in a primary clarifier. (See Photograph125).

IV. Records Review

EPA requested and received copies of the following documents:

- Current WWTP process schematic
- Operator certifications
- eDMRs submittal for 2022
- eDMRs submittal 2020
- Headworks ORF O&M Manual
- O&M Manual Erie WWTP ORF
- August 2022 Fecal Exceedance Letter
- February 2022 Fecal Exceedance Letter
- May 2022 Fecal Exceedance Letter
- September 2022 Fecal Exceedance Letter
- Homeowners' Complaints 2022
- Plugged Sewer Main complaints 2022

- City of Erie Fats Oils and Grease Ordinances
- Erie WWTP CIP Projects
- Erie WWTP Evaluation and Capacity Analysis
- Erie 2022 Chapter 94 Report
- Erie Sewer Authority and City of Erie CSO Annual Notification Report
- Erie SSO 5-Day letter

Records pertaining to the inspection report are attached, with additional records being kept on file.

V. Closing Conference

After the facility walk, the EPA Inspection Team met with the facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the facility representatives. The EPA Inspection Team reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 3:00 PM.

V. List of Attachments

- | | |
|---------------|--|
| Attachment 1. | NPDES Permit |
| Attachment 2. | Photograph Log |
| Attachment 3. | City of Erie 2022 Chapter 94 Report |
| Attachment 4. | EPA ECHO Effluent Data |
| Attachment 5. | Erie WWTP Evaluation and Capacity Analysis |