



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

Purpose: Clean Water Act Compliance Inspection

Inspection Type: National Pollutant Discharge Elimination System (NPDES)

Facility: Columbus Grove Wastewater Treatment Plant (WWTP)
113 East Sycamore Street, Columbus Grove, Ohio 45830

NPDES Permit Number: OH0024759

Facility Type: Wastewater Treatment Facility

Date of Inspection: July 27, 2022

EPA Inspector(s):

1. Jessica Stromsdorfer, stromsdorfer.jessica@epa.gov
2. Ben Atkinson, atkinson.ben@epa.gov

Other Attendees:

1. Bob Huff, Operator, cgwater@q1.net

Additional Facility Contacts:

1. Bob Michaels, cgwater@q1.net
2. Jeff Vance, Village Administrator, cgadmin@q1.net

EPA Lead Inspector Signature: JESSICA STROMSDORFER Digitally signed by JESSICA STROMSDORFER
Date: 2022.10.04 11:53:52 -05'00'

Approver Name & Title:

Molly Smith, Supervisor, Section 1, Water Enforcement and Compliance Assurance Branch

Approver Signature: MOLLY SMITH Digitally signed by MOLLY SMITH
Date: 2022.10.04 13:39:48 -05'00'

Facility Notification:

- Unannounced Inspection
- Announced Inspection

Regulations Relevant to Inspection: NPDES permit requirements at 40 C.F.R. § 122.26

Arrival Time: 9:15 AM

Departure Time: 11:00 AM *approximately*

OPENING CONFERENCE

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet
- Small Business Resource Information Sheet not provided. Reason: Not a small business
- Provided CBI warning to facility

The following information was obtained through review of the facility NPDES Permit, and verbally from Representatives of the Columbus Grove WWTP, unless otherwise noted.

Discussion:

Upon arrival, inspectors met the Facility representative, Bob Huff, in the laboratory building, who has been the Facility's operator since 2006. He shares duties with another operator, named Bob Michaels. Mr. Huff and the inspectors discussed the background of the Facility.

The Facility is the wastewater treatment plant for the town of Columbus Grove, Ohio. According to Mr. Huff, the town has about 2,150 residents. The plant influent consists mostly of domestic sewage and one industrial user connection. The system had previously struggled with sanitary and combined sewer overflows, but not since it separated its sewers about five years ago. Mr. Huff estimated that the plant receives about 250,000 gallons per day of influent.

The treatment process includes grit removal, primary clarifiers, rock filter tanks, a final clarifier, and chlorine contact tanks. Mr. Huff explained that he takes the internal samples at the grit room and the final samples at the effluent location after the chlorine treatment. There is one outfall to Plum Creek, a 303(d) listed impaired waterway.

According to Discharge Monitoring Reports (DMRs), the Facility has had effluent limit exceedances for ammonia, mercury, e. Coli, oil and grease, pH, and chlorine within the past three years. There also have been DMRs with missing parameter values during that timeframe. Mr. Huff explains that mercury has been an ongoing issue at the Facility and they have been unable to track down the source.

According to the permit, the Facility is required to implement a pollutant minimization program (PMP) for mercury, which includes elements such as:

- Effluent limit compliance

- Contact with local sources
- Providing public educational materials
- Submitting a PMP progress report

When asked about the implementation of this program, Mr. Huff explained that he would need to check administrative records for any information regarding the PMP.

In addition to mercury, the Facility has had historical issues with other effluent violations resulting in a Schedule of Compliance to be included in their 2018 NPDES permit. The NPDES permit schedule requires the Facility to complete:

- A. Evaluation for Reducing Discharges of Phosphorus;
- B. E. Coli Schedule;
- C. Long-Term Control Plan (LTCP) Post-Construction Compliance Monitoring; and
- D. LTCP Plan Completion Evaluation Report.

According to online documentation with the Ohio EPA, the Facility has failed to complete items C and D of the NPDES permit schedule. When asked to provide documentation for completion of items A and B, Mr. Huff explained that he would need to check the administrative office for any records.

The inspection team proceeded with a tour of the Facility.

FACILITY WALKTHROUGH

Observations:

The inspection team first looked at the laboratory. Mr. Huff explained that the Facility does onsite sampling for pH, DO, temperature, and flow, but has an outside laboratory, Alloway, analyze other permitted parameters. Mr. Huff takes samples from an internal monitoring location and reuses containers to collect effluent for sampling (photo 3). The operator calibrates DO and pH samplers daily (photo 1), but inspectors observed that the pH buffer and storage solution were both expired. Additionally, the Facility was using distilled water, rather than deionized water.

Inspectors then viewed the treatment equipment. Inspectors first viewed areas including the influent pump area, influent chamber, grit removal area, sludge pumps, and sludge drying beds (photos 4-11). Mr. Huff noted that grit and sludge are sent to a landfill. Next, the inspection team viewed the primary clarifiers. One of the clarifiers was out of order and the other had a thick film on the water (photo 12). According to Mr. Huff, both clarifiers run during normal operation. From the primary clarifiers, water is pumped to the roughing filters (photos 15, 16). Water enters either filter through the filter tank diverter, which inspectors observed had weeds growing inside of it (photo 14). Finally, water is sent through a final clarifier (photo 21) then to a chlorine contact tank for disinfection (photos 17, 18). Inspectors observed algae and weeds growing in the first three cells.

After the final treatment step of disinfection, flow is measured at a weir (photo 19) and the operator collects samples from outfall 602 (photos 22, 23). The samples are all collected as grab samples. The effluent discharges west of the site into Plum creek. The outfall sign was visible but mostly obstructed by foliage (photos 27,28).

Photos and/or Videos: were taken during the inspection. Included as Attachment A

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

- Provided U.S. EPA point of contact to the facility
- Confirm CBI status at end of closing conference

Requested documents:

- Most recent mercury PMP report
- NPDES Permit, Part I, C documents:
 - Phosphorus evaluation
 - E. Coli schedule status report
 - Long term control plan post construction compliance monitoring plan
 - Long term control plan completion evaluation report
- Any Sanitary Sewer Overflow (SSO) reports or notifications
- Last 3 months of DMRs
- Last 3 months of Alloway’s lab reports
- Copy of NPDES permit

Mr. Huff was unable to find records of the Mercury PMP report, NPDES Permit Part I, C documents, or SSO reports and notifications.

Areas of Concern:

Area of Concern	Finding
Effluent Quality	NPDES Permit effluent limit exceedances
Sampling Procedures	All samples taken as grab samples; no composite samples taken
	All samples taken with reusable containers, instead of fresh containers
	Calibration using expired buffer solution and distilled water instead of deionized water
Reporting & Submissions	Failure to submit full DMRs in June and May 2022
	Missing reports required by NPDES permit (mercury PMP report; NPDES Permit Part I, C documents; SSO annual report)
Operation and Maintenance	Weeds growing in chlorine tank and filter diverter
	Primary clarifier out of operation
Other	Obstructed outfall signage

APPENDICES AND ATTACHMENTS

ATTACHMENT A: COLUMBUS GROVE WWTP PHOTO LOG