



July 16, 2026

Transmitted Electronically

Mr. Mike Caprella, Utilities Director
City of Lima
50 Town Square
Lima, Ohio 45804

**Re: Lima WWTP
Inspection
NPDES
Allen County
2PE00000**

Subject: Ohio Environmental Protection Agency NPDES Inspection

Dear Mr. Caprella:

Ohio EPA conducted an inspection of the Lima Wastewater Treatment Plant (WWTP) on July 7, 2026. Mr. Tom Poffenbarger and I conducted the inspection. Mr. Shawn Dershem, Plant Supervisor, Mr. Joe Welker, Assistant Plant Supervisor, Mr. Eric Bontrager, Utilities Operations Manager, Ms. Amy Staley, Utilities Industrial Monitoring Chief, and Mr. Larry Huber, Utility Field Services Supervisor, were also present during 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 inspection included the completion of the attached checklist and a tour of the WWTP.

Facility Description:

The Lima wastewater treatment has an average daily design flow of 18.5 MGD. Treatment components include mechanical screens, aerated grit removal, primary clarification, extended aeration, final clarification, denitrification, disinfection with sodium hypochlorite, and dechlorination. A side stream of primary clarifier effluent is sent to the nitrification towers to help seed the biology within. During peak wet weather, up to 30 MGD will go directly to the nitrification towers and blend with the secondary clarifier effluent prior to disinfection. This will enable the plant to treat up to 70 MGD in peak wet weather. Biosolids are treated in anaerobic digesters, then thickened in the thickening tanks and dewatered using a belt press. These class B biosolids are disposed of in a landfill. The City has the ability to further treat the biosolids with lime and fly ash to produce exceptional-quality (EQ) biosolids, but is not currently producing EQ biosolids.

Findings:

1. In the past year, the top two layers of media were replaced in the Nitrification towers. Regrowth of the bacteria on the media was slower than expected.
2. The City is in significant non-compliance (SNC) due to violations within the time period of January 2026 through July 2026. SNC is a programmatic definition used to prioritize enforcement. In this case, the facility is in SNC due to ammonia exceeding effluent limits by greater than 40% in at least two months out of a six-month period. A separate Notice of Violation will follow.
3. Lima is currently performing a pilot study of NeoWater for settling and phosphorus removal.
4. Lima has an Ohio Administrative Code 3745-7-02(D) exemption, which allows the Class III operator to act as the operator of record for up to 2 years. The exemption expires July 31, 2026.
5. Lima has approved reduced staffing hours dated July 26, 2021. There have been staffing changes since this was approved.
6. The Stormwater Pollution Prevention Plan (SWPPP) is dated December 12, 2019.

Recommendations:

The recommendation(s) set out below are not Orders. The recommendations are offered by Ohio EPA in an effort to provide compliance assistance to your facility.

1. Because the OAC 3745-7-02(D) exemption will soon expire, we recommend that you apply for an extension. The request should be sent to Anthony Nosko, anthony.nosko@epa.ohio.gov in our Central Office.
2. We recommend that the City requests a new approval for reduced staffing hours. The form can be found at our website at [MinStaffReductionRequestForm.doc.pdf](#). Until this is approved, you must meet the 40-hour-per-week staffing requirement.
3. We recommend that you update the Stormwater Pollution Prevention Plan. Ohio EPA has developed a template that may assist you. The template can be downloaded from our website at [OHR000007_Template_SWPPP.docx](#). Sample recordkeeping templates and the Annual Reporting Form can also be found on our website: [Industrial Stormwater - General Permit | Ohio Environmental Protection Agency](#). Click on the Permit Guidance, Compliance, and Support Tab.

Mr. Mike Caprella

July 15, 2026

Page 3

If you have any questions or comments concerning the enclosed inspection report, please contact me at 419.373.3006 or by email at peggy.christie@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink that reads "Peggy B. Christie". The signature is written in a cursive, flowing style.

Peggy B. Christie

Environmental Engineer II

Compliance and Enforcement

Ohio EPA Division of Surface Water

Northwest District Office

/cle

ec: Shawn Dershem, Plant Supervisor, City of Lima,
Eric Bontrager, Utilities Operations Manager, City of Lima
Amy Staley, Industrial Monitoring Chief, City of Lima
Larry Huber, Utility Field Services Supervisor, City of Lima

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING						
Permit #	NPDES #	Inspection Type	Sig. Non-Compliance	Inspection Date	Entry Time	Exit Time
OH0026069	2PE00000	CEI	Yes	7/7/2026	8:55 A.M.	12:49 P.M.

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Lima WWTP 1200 Fort Amanda Road Lima, OH	8/1/2023
	Permit Expiration Date
	6/30/2028
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Shawn Dershem, Plant Supervisor	419.221.5191
Joe Welker, Assistant Plant Supervisor	419.221.5198
Eric Bontrager, Utilities Operations Manager	419.221.5136
Amy Staley, Utilities Industrial Monitoring Chief	419.221.5196
Larry Huber, Utility Field Services Supervisor	419.221.5276
Name and Title of Responsible Official	Phone Number
Mike Caprella, Utilities Director	419.221.5108

SECTION C: AREAS EVALUATED DURING INSPECTION		
Evaluated? Y-Yes; N-No	Area Evaluated	Recommendations noted in report? Y – Yes; N – No; N/A – Not Applicable
Y	E. NPDES Compliance	N
Y	F. Operations & Maintenance	N
Y	G. Operator Certification	Y; see recommendations # 1 & 2.
Y	H. Collection System	N
Y	I. Sludge Management	N
Y	J. Stormwater	Y; see recommendation # 3.
Y	K. Self-Monitoring Program	N
Y	L. Laboratory	N
Y	M. Effluent / Receiving Water Observations	N

Signatures	
 07/14/2026	 7/15/2026
Peggy B. Christie Compliance and Enforcement Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office

Compliance Data for Lima WWTP between 7/1/2023 and 6/1/2026

Summary

Permit Effluent Limit Violations: 46
Permit Effluent Code Events: 10
Permit Effluent Frequency Violations: 0
Compliance Schedule Milestones Not Entered: 0
Reported SSO Events: 588

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2023	001	Mercury, Total (Low Level)	30D Conc	3.5	6.67	8/1/2023
October 2023	001	E. coli	30D Conc	126	140.378	10/1/2023
October 2023	001	E. coli	7D Conc	284	986.969	10/8/2023
October 2023	001	Nitrogen, Ammonia (NH3)	7D Conc	2.4	4.252	10/8/2023
October 2023	001	Nitrogen, Ammonia (NH3)	7D Qty	168	190.642	10/8/2023
January 2024	604	Total Suspended Solids	30D Conc	45	66.8	1/1/2024
January 2024	604	Total Suspended Solids	1D Conc	65	71.6	1/12/2024
February 2024	001	Nitrogen, Ammonia (NH3)	30D Conc	1.7	3.5658	2/1/2024
February 2024	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	3.67	2/1/2024
February 2024	001	Nitrogen, Ammonia (NH3)	30D Qty	119	146.032	2/1/2024
February 2024	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	4.0292	2/8/2024
February 2024	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	3.8114	2/15/2024
February 2024	001	Dissolved Oxygen	1D Conc	5.0	4.4	2/22/2024
February 2024	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	2.7526	2/22/2024
February 2024	001	Dissolved Oxygen	1D Conc	5.0	3.8	2/23/2024
February 2024	001	Dissolved Oxygen	1D Conc	5.0	3.9	2/24/2024
March 2024	001	Nitrogen, Ammonia (NH3)	30D Conc	1.7	2.15475	3/1/2024
March 2024	001	Nitrogen, Ammonia (NH3)	30D Qty	119	123.912	3/1/2024
March 2024	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	3.0678	3/8/2024
March 2024	001	Nitrogen, Ammonia (NH3)	7D Qty	182	212.597	3/8/2024
March 2024	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	3.0432	3/15/2024
August 2024	001	Chronic Tox., Ceriodaphnia	30D Conc	1.0	1.2	8/1/2024
January 2025	001	Nitrogen, Ammonia (NH3)	30D Conc	1.7	3.8	1/1/2025
January 2025	001	Nitrogen, Ammonia (NH3)	30D Qty	119	179.	1/1/2025
January 2025	001	Nitrogen, Ammonia (NH3)	7D Qty	182	218.	1/15/2025
January 2025	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	4.8	1/15/2025
January 2025	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	8.1	1/22/2025
January 2025	001	Nitrogen, Ammonia (NH3)	7D Qty	182	380.	1/22/2025
February 2025	001	Nitrogen, Ammonia (NH3)	30D Conc	1.7	1.8	2/1/2025

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2025	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	2.9	2/1/2025
September 2025	001	pH, Minimum	1D Conc	6.5	6.4	9/1/2025
October 2025	001	E. coli	7D Conc	284	865.	10/1/2025
January 2026	001	Nitrogen, Ammonia (NH3)	30D Conc	1.7	2.2	1/1/2026
January 2026	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	7.1	1/22/2026
February 2026	001	Nitrogen, Ammonia (NH3)	7D Qty	182	283.	2/1/2026
February 2026	001	Nitrogen, Ammonia (NH3)	30D Conc	1.7	4.	2/1/2026
February 2026	001	Nitrogen, Ammonia (NH3)	30D Qty	119	181.	2/1/2026
February 2026	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	7.5	2/1/2026
February 2026	001	Nitrogen, Ammonia (NH3)	7D Qty	182	270.	2/8/2026
February 2026	001	Nitrogen, Ammonia (NH3)	7D Conc	2.6	5.2	2/8/2026
March 2026	604	Total Suspended Solids	30D Conc	45	74.	3/1/2026
March 2026	604	CBOD 5-day	30D Conc	45	64.	3/1/2026
March 2026	001	Total Suspended Solids	7D Conc	20	24.	3/1/2026
March 2026	604	Total Suspended Solids	1D Conc	65	92.5	3/5/2026
March 2026	604	CBOD 5-day	1D Conc	65	79.	3/5/2026
March 2026	604	Total Suspended Solids	1D Conc	65	95.7	3/11/2026

Code Events				
Reporting Period	Station	Parameter	Reported Value	Event Date
June 2025	001	Acute Toxicity, Ceriodaphnia Dubia	AE	6/2/2025
June 2025	001	Chronic Toxicity, Ceriodaphnia Dubia	AE	6/2/2025
June 2025	801	48-Hr. Acute Toxicity	AE	6/3/2025
June 2025	801	7-Day Chronic Toxicity	AE	6/3/2025
September 2025	001	E. coli	AE	9/30/2025
October 2025	001	E. coli	AE	10/31/2025
May 2026	001	CBOD 5-day	AE	5/18/2026
May 2026	601	CBOD 5-day	AE	5/18/2026
May 2026	001	CBOD 5-day	AE	5/19/2026
May 2026	601	CBOD 5-day	AE	5/19/2026

Lima WWTP SSO Events			
Parameter	Units	Date	Reported Value
Overflow Occurrence	No./Month	7/1/2023	15
Overflow Occurrence	No./Month	8/1/2023	10
Overflow Occurrence	No./Month	10/1/2023	9
Overflow Occurrence	No./Month	11/1/2023	2
Overflow Occurrence	No./Month	1/1/2024	24
Overflow Occurrence	No./Month	2/1/2024	3
Overflow Occurrence	No./Month	3/1/2024	30
Overflow Occurrence	No./Month	4/1/2024	61
Overflow Occurrence	No./Month	5/1/2024	37
Overflow Occurrence	No./Month	6/1/2024	22
Overflow Occurrence	No./Month	7/1/2024	21
Overflow Occurrence	No./Month	8/1/2024	16
Overflow Occurrence	No./Month	9/1/2024	12
Overflow Occurrence	No./Month	11/1/2024	11
Overflow Occurrence	No./Month	12/1/2024	26
Overflow Occurrence	No./Month	2/1/2025	8
Overflow Occurrence	No./Month	3/1/2025	21
Overflow Occurrence	No./Month	4/1/2025	46
Overflow Occurrence	No./Month	5/1/2025	40
Overflow Occurrence	No./Month	6/1/2025	25
Overflow Occurrence	No./Month	7/1/2025	26
Overflow Occurrence	No./Month	9/1/2025	5
Overflow Occurrence	No./Month	10/1/2025	7
Overflow Occurrence	No./Month	11/1/2025	1
Overflow Occurrence	No./Month	12/1/2025	9
Overflow Occurrence	No./Month	2/1/2026	1
Overflow Occurrence	No./Month	3/1/2026	20
Overflow Occurrence	No./Month	4/1/2026	59
Overflow Occurrence	No./Month	5/1/2026	21

Facility Name	Station Code	Param Code	Parameter Name	Max % Exceed	# Months Signif Exceed (1)**	# Months Exceed (2)**	End Query Date
Lima WWTP	001	00610	Nitrogen, Ammonia (NH3-N)	188.5	2	2	6/1/2026

Comment: Ammonia violations were due to a project on the nitrification towers. The top two layers of media were replaced. The distribution mechanism on the towers was damaged and required replacement. Once complete, and due to the cold winter, it has been difficult to regrow the bacteria needed for treatment.

One additional process change allows a portion of wastewater to be introduced in the third pass of the aeration tank and appears to be helping with ammonia treatment.

High Flow Data for Lima WWTP between 7/1/2023 and 6/1/2026

Top 10 Flows	
Date	Flows (MGD)
12/31/2024	46.530
12/30/2024	38.720
12/29/2024	37.560
12/15/2024	29.100
12/9/2024	28.840
7/10/2023	27.525
10/30/2023	27.437
12/16/2024	27.190
8/25/2023	26.088
11/18/2023	24.763
Average	12.642

SECTION D: PERMIT VERIFICATION

	Yes	No	N/A
a. Correct name and mailing address of permittee	☒	☐	
b. Correct name and location of receiving waters	☒	☐	
c. Flows and loadings conform with NPDES permit	☒	☐	
d. Treatment processes are as described in permit application	☒	☐	
e. New treatment process added since last inspection	☐	☒	
f. Notification given to State of new, different or increased discharges	☐	☐	☒
g. All discharges are permitted	☒	☐	
h. Number and location of discharge points are as described in permit	☒	☐	☐
i. Are all stormwater discharges properly permitted?	☒	☐	
For Industrial Facilities Only			
j. Products and production rates conform with permit application?	☐	☐	☒
k. Do categorical standards apply? If yes, which ones?	N/A		

Comments:

•

SECTION E: COMPLIANCE

See previous page for more compliance information.

	Yes	No	N/A
a. NPDES renewal app submitted 180 days prior to expiration	☒	☐	☐
b. Permittee has a compliance schedule	☒	☐	☐
c. Document containing compliance schedule	NPDES		
d. Permittee is meeting compliance schedule	☒	☐	☐
e. Any bypasses since last inspection	☐	☒	
f. Regulatory agency notified of all bypasses	☐	☐	☒
g. Permittee or representative reporting all noncompliance per Part III of NPDES	☒	☐	☐

SECTION F: OPERATION AND MAINTENANCE

a. Standby power available	2-Generators		
b. Standby power provides power to which treatment components?	The whole plant.		
c. Which treatment components have alarm system available for power or equipment failures?	Everything - SCADA		
	Yes	No	
d. All treatment units in service other than backup units	☒	☐	
e. Routine and preventative maintenance scheduled and performed	☒	☐	
f. Any major equipment breakdown since last inspection	☒	☐	
g. Operation and maintenance manual provided and maintained	☒	☐	
h. Any operational problems due to influent quality or quantity since last inspection	☒	☐	
i. Are WWTP operations changed during high-flow events?	☒	☐	
j. Does your facility accept trucked in wastewater, and if so, from what sources?	Residential septage only. Every load required to leave a sample.		

Comments:

- e. City works program generates work orders and tracks maintenance.
- f. One WAS pump replaced; one RAS pump down and a new one has been ordered (currently a portable pump is being used); one blower was repaired; a screw pump at Baxter Street pump station was replaced; maintenance at the river structures included fine screens added at two structures and power upgrades at the other three.
- h. Occasionally, foaming issues due to excess surfactants in the influent from an industrial user.
- i. During high flows, a portion of the primary clarifier effluent is diverted to the towers for treatment.

SECTION G: OPERATOR CERTIFICATION

a. Wastewater Treatment Works Classification	IV		
	Yes	No	N/A
b. Operator of Record holds unexpired license of class required by Permit?	☐	☒	
c. Current Operator of Record form submitted?	☒	☐	
d. Copy certificate(s) and renewal card(s) of all professional operators displayed on-site?	☒	☐	
e. Minimum operator staffing requirements fulfilled (OAC 3745-7)	☒	☐	
f. If required (Class A or 1), are daily visits conducted by an owner's representative?	☐	☐	☒
g. If a Staffing Reduction plan has been approved, are the stipulations of the plan being met?	☐	☒	☐
h. Has the Operator of Record submitted written notifications 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?	☒	☐	☐
i. Professional Operator of Record logbook provided?	☒	☐	
j. Logbook location	Office		
k. Logbook Format	Hardbound		
l. Has the professional Operator of Record(s) completed their electronic time submission (DMR or other option)?	Yes		
m. Do the electronic time submissions match the logbook?	Yes		
Logbook contains the following:			
n. Identification of treatment works	☒	☐	
o. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	☒	☐	
p. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)	☒	☐	
q. Laboratory results (unless documented on bench sheets)	Bench Sheets		
r. Identification of person making entries	☒	☐	

Continued... SECTION G: OPERATOR CERTIFICATION

Comments:

- b. 3745-7-02(D) exemption requested expires 7/31/2026. Need to apply for an extension.
g. Reduced staffing hours were approved on 7/26/2021. Since that time, there have been many staffing changes. This will need to be renewed.
p. Operator on Duty logbook is used to track daily processes. The operator of record maintains his own book to log hours.

SECTION H: COLLECTION SYSTEM

Collection System Overview

a. Which department oversees collection system operation and maintenance	Pump Stations are maintained by WWTP. Collections is maintained by Field Services
b. Who is the certified operator serving as the professional Operator of Record for the collection system?	Larry Huber (for collection system)
c. Professional Operator(s) of Record holds unexpired license of class required by Permit?	Yes
d. Current Operator of Record form submitted?	Yes (6/7/2021 notification)
e. Copy of certificate(s) and renewal card(s) of all professional operators displayed on-site?	Kept in Field Services office. Not evaluated.
f. Minimum operator staffing requirements fulfilled (OAC 3745-7)	Yes
g. Is there a plan for collection system maintenance? If yes, to what extent is this plan being implemented?	The Consent Decree with USEPA requires biannual reporting documenting how many miles of sewer cleaned/repaired/upgraded. Hot spots (restaurant areas) are cleaned twice a year.
h. Were there any major repairs or improvements to collection system since last inspection?	High Street – new 54” sewer North McDonald – replace sewer and manhole following a manhole that collapsed.
i. Name the satellite communities that discharge into your collection system	Allen County

Continued... SECTION H: COLLECTION SYSTEM

Pumps and Force Mains

a. How many lift stations are within the collection system?	32, including Baxter Street (main lift station)
b. How many lift stations have alarms?	All
c. How many lift stations are equipped with permanent standby power or equivalent?	All have a generator connections; 6 have permanent (either generators or an engine).

Capacity / SSOs / I&I / WIB

	Yes	No
a. Are portable pumps used to relieve the system?	☐	☒
b. Any complaints received since last inspection of basement flooding?	☐	☒
c. Have there been any SSOs since the last inspection?	☒	☐
d. What progress has been made in SSO elimination if applicable?	This is part of the Consent Decree. Currently working on modeling and design for collection system upgrades (possibly 3 more EQ basins).	
e. Are any portions of the sewer system at or near dry weather capacity? If yes, describe plans.	No	
f. Is there an inflow and infiltration reduction plan being followed? If yes, describe plans.	Yes – part of the Consent Decree. Flow monitoring has identified areas with higher I & I.	

Combined Sewer System

	Yes	No
a. Does the collection system include combined sewers?	☒	☐
Skip following questions if there are no combined sewers		
b. Are all CSOs included in your NPDES permit? If not, explain.	Yes	
c. What is the status of the LTCP implementation?	On-going. Also included with the Consent Decree	
d. If there is no LTCP, what is the status of preparation of the LTCP?	N/A	

SECTION I: SLUDGE MANAGEMENT

a. Date of last sludge inspection	June 13, 2023		
b. Sludge disposal method	Haul to Mixed Sanitary Landfill		
c. Name of sludge disposal contractor	Republic hauls to either Wyandot County or Cherokee Run Landfills		
d. How many days of sludge storage are provided at plant?	30 days using the canopies, with a possible additional 30 days using the windrows in the sludge building.		
	Yes	No	
e. Has amount of sludge generated changed significantly since last inspection?	☐	☒	
f. Sludge records maintained for a minimum of 5 years?	☒	☐	
g. Any complaints received last year regarding sludge	☐	☒	
h. Is sludge adequately processed (digestion, pathogen control)	☒	☐	
i. Is inadequate sludge handling causing operational problems?	☐	☒	

Comments:

SECTION J: STORMWATER PROGRAM - POTW

POTW Part IV, V, VI

	Yes	No	N/A
a. Is design flow > 1 MGD or is facility required to have a pretreatment program?	☒	☐	
b. Are industrial materials and activities exposed to stormwater?	☒	☐	
If yes			
i. Does permit contain Parts IV, V and VI, or	☒	☐	☐
ii. Does facility have coverage under general NPDES permit for stormwater associated with industrial activity?	☐	☒	☐
If no			
i. NOE submitted within last 5 years?	☐	☐	☒
ii. Does facility meet NOE requirements? (See guidance)	☐	☐	☒

Stormwater Pollution Prevention Plan (SWP3)

	Yes	No	N/A
a. Certification statement signed & dated since most recent modification Yes, but needs updating	☐	☒	
b. List current Pollution Prevention team, w/ names & SWP3 responsibilities Needs updating	☐	☒	
c. Description of pollutant sources (including as applicable):	☒	☐	

Stormwater Pollution Prevention Plan (SWP3)	Yes	No	N/A
i. Grit, screenings, and other solids handling, storage, or disposal areas	☒	☐	
ii. Sludge drying beds	☒	☐	
iii. Dried sludge piles	☒	☐	
iv. Compost piles	☐	☒	
v. Septage or hauled waste receiving station	☒	☐	
vi. Access roads and rail lines	☐	☐	☒
d. Site map current with size of property, location and extent of significant structures and impervious surfaces, drainage patterns, storm sewers/catch basins/outfalls, receiving waters, BMPs, pollutant sources, locations of significant spills/leaks, material handling & storage areas, stormwater monitoring locations and location of non-stormwater discharges marked?	Needs updating – difficult to read.		
i. Stormwater outfalls should be numbered (001, 002, etc.).	Needs updating		
ii. Must show location of grit, screenings and other solids handling, storage or disposal areas; sludge drying beds; dried sludge piles; compost piles; septage or hauled waste receiving station; and storage areas for process chemicals, petroleum products, solvents, fertilizers, herbicides and pesticides			
e. Inventory of all exposed materials	☒	☐	
f. List of spills and leaks	☐	☒	
g. Description of control measures, schedules, and procedures	Needs updating		
i. Minimize Exposure	NE		
ii. Salt piles covered or enclosed	☐	☐	☒
iii. BMPs for material transfer areas minimize exposure	NE		
iv. Dumpsters/roll-offs covered and/or leak proof	NE		
v. Good Housekeeping	NE		
vi. Materials orderly and labeled	NE		
vii. Exposed areas clean	NE		
viii. Minimize dust & offsite tracking	NE		
ix. Controls for Waste, Garbage & Floatable Debris	NE		
x. Permanent (Post-Construction) stormwater Management Practices	NE		

Stormwater Pollution Prevention Plan (SWP3)		Yes	No	N/A
xi.	Sediment & Erosion Controls	NE		
	i. Any areas of bare soil or sparse vegetation	NE		
	ii. Flow dissipation devices at outfalls and along channels	NE		
xii.	Spill Prevention and Response	NE		
	i. Traffic barriers/Secondary containment/Emergency shutoff switch	NE		
	ii. Spill response supplies & ER Hotline Number (1-800-282-9378) readily accessible and available?	NE		
h.	All equipment and controls maintained and repaired (including catch basins & storm sewer)	NE		
i.	Runoff Management: Has BMPs to divert, infiltrate, reuse, or otherwise reduce runoff	NE		
j.	Annual Employee Training records includes	Annual training appears to be more for the MS4.		
	i. petroleum product management,			
	ii. process chemical management			
	iii. spill prevention and controls,			
	iv. fueling procedures			
	v. general good housekeeping practices			
	vi. proper procedures for using fertilizer, herbicides and pesticides			
vii.	Names	☒	☐	
k.	Non-stormwater discharge evaluation (Must include a description of how equipment and vehicle wash water is managed. Discharges of sanitary and industrial wastewater and equipment vehicle wash water from the stormwater conveyance system are prohibited.	☐	☒	

Comment: The plan is outdated and difficult to follow. I recommend updating the plan using Ohio EPA's template. The template can be accessed here:

[OHR000007_Template_SWPPP.docx](#)

We also have record-keeping templates available. These can be found here:

[OHR000007_Sample_Recordkeeping_Template.docx.](#)

POTW Stormwater Inspections

	Yes	No	N/A
a. Routine facility inspections conducted quarterly?	☒	☐	
b. Quarterly visual assessment of stormwater discharge conducted?	☐	☒	☐
i. Samples taken within first 30 minutes of discharge from storm event with 72-hour or greater antecedent dry period?	☐	☐	☒
ii. If claiming substantially identical outfalls, is that accurate?	☐	☐	☒
c. Comprehensive site inspection conducted annually?	☐	☒	☐
i. Annual report completed?	☐	☒	☐

Comment: The annual report form can be found here: [OHR000007_AR.docx](#). Please note that this form is for the general permit, but it can be edited for your permit. This does not need to be submitted to Ohio EPA, but should be kept available on-site.

SECTION K: SELF-MONITORING PROGRAM

Flow Measurement

	Yes	No
a. Actual flow discharged is measured?	☒	☐
b. Flow measurement equipment adequate to handle full range of flows	☒	☐
c. Is the primary flow measuring device calibrated at least annually or in accordance with manufacturers specifications	☒	☐
d. Date of last calibration	Magmeter	
e. Who calibrates the flow measuring device?	NA	
f. Frequency of calibration	NA	
g. How often is the flow measuring device checked for functionality?	Daily	
h. Secondary instruments operated and maintained	☒	☐

Comment: New meters installed this year.

Sampling, Monitoring, and Records

	Yes	No	N/A
a. Sampling location(s) are as specified by permit	☒	☐	
b. Sampling frequency agree with permit (look at compliance table for frequency violations or missing DMRs)	☒	☐	
c. Are proper sampling methods used (i.e. Oil & Grease collected in a glass container)	☒	☐	
d. Are the proper sampling types used (i.e., Grab, Composite, Flow proportionate, etc.)	☒	☐	
e. Are the field parameters (pH, DO, total residual chlorine, temperature) measured within 15 minutes of collection?	☒	☐	☐

Sampling, Monitoring, and Records

	Yes	No	N/A
f. 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)	☒	☐	

Comments: Continuous monitoring for pH and DO. Operators analyze for Chlorine Residual immediately. Recommend documenting the times samples were collected and analyzed.

SECTION L: LABORATORY

In-House Sampling:

Parameter	Analytical testing methods used
TSS	USGS I-3750-85
CBOD	SM 5210 B
Ammonium	ASTM D6919-09
Phosphorus	Hach 8190 approved equivalent to SM 4500 P
Nitrate + Nitrite	ASTM D4327-03
Total Filterable Residue	USGS I-1750-85
E. coli	SM 9223 B
pH	SM 4500-H+ B
Chlorine residual	SM 4500-Cl-E

	Yes	No	N/A
a. Quality assurance manual provided and maintained?	☒	☐	
b. Does quality assurance manual contain SOPs for all sampling and analyses conducted on site?	☒	☐	
c. If alternate procedures are used, are they U.S. EPA approved?	☒	☐	☐
d. Are permit required parameters analyzed more frequently than required by the permit?	☒	☐	
i. If yes, are results recorded in permittee's e-DMR report?	☒	☐	☐

Continued... SECTION L: LABORATORY

Commercial Laboratory Sampling:

Laboratory Name: Alloway

Parameter	Analytical testing methods used
Hexavalent Chromium	SM 3500 CRV
O & G	EPA 1664 A
TKN	EPA 351.2
Metals	EPA 200.8
Free Cyanide	ASTM D7237-10
Bis-2	EPA 625.1
Low-level Mercury	EPA 1631 E
Bioassay	EPA-2000, 1000, 2002, 1002
Nitrate + Nitrite	EPA 353.2 / SM 4500 NO3

Quality Assurance and Quality Control	Yes	No	N/A
a. Does the lab participate in DMRQA or other QC programs?	☒	☐	
b. Has corrective action been taken for any parameters found unsatisfactory in the last DMRQA or water Pollution Studies?	☒	☐	☐
i. Date of last study	October 2025		
ii. Parameters found unsatisfactory	Orthophosphate		
c. Has a Performance Audit Inspection (PAI) been conducted by Ohio EPA, Division of Environmental Services since the last inspection?	☐	☒	
i. If yes; have the recommendations from that PAI been implemented?	☐	☐	☒

The city contracts Orthophosphate to Alloway now.

SECTION M: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Odor
001	Yes	No	No	No	slight	No	No	No
101	Not evaluated							
102	Not evaluated							
103	Not evaluated							
104	Not evaluated							
105	Not evaluated							
106	Yes	Not discharging						

Comments: The effluent was observed at the outfall and following dechlorination.

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

OMB No. 158-R0035

RATING CODES: S = Satisfactory; **U** = Unsatisfactory; **M** = Marginal; **IN** = In Operation; **OUT** = Out of Operation; **NE**=Not evaluated

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	NE	Backflow preventers installed - will be inspected by the health department.
	Safety Features	S	Fence around the property.
	Bypasses	N/A	
	Storm Water Overflows	NE	
	Alternate Power Source	S	Two Diesel Generators. Tested 1/month; quarterly under load. Participates in ENELY. Auto switch after 7 seconds of lost power.
Preliminary	Maintenance of Collection Systems	S	Handled by Field Services.
	Pump Station	NE	
	Ventilation	NE	12 air exchanges when lights on; 6 when lights are off.
	Mechanical Bar Screen	IN	Four 1/4 inch chain and rake screens. 2 are currently in use. Each can treat 18 MGD
	Bar Screen	IN	On standby. Used when mechanical screens are out of service.
	Disposal of Screenings	S	Landfill
	Grit Removal	IN	Four tanks, aerated; 4 grit cyclones; one grit classifier. 2 cyclones are currently in service. Rotated
	Disposal of Grit	S	Landfill
	Grease Removal	S	Grease compactor. Hauled grease trap waste is unloaded to scum pit.
	Septage Receiving	IN	Septage receives full treatment. All trucks are weighed, manifested.
Primary	Settling Tanks	IN	4 large tanks, three small tanks (5, 6 & 7). Tanks 5, 6 & 7 used in low flows. Tanks 1-4 brought online during wet weather. Tanks 5 & 6 in service. Tanks 1-4 are currently draining back to the plant.
	Scum Removal	IN	Skimmer units. Goes to scum pit, then to scum concentrator.
	Sludge Removal	IN	Bottom collector units; 4 centrifugal pumps. Goes to thickeners
	Chemical Addition	IN	Ferrous Chloride and polymer are added before aeration. Conducting a trial of NeoWater added to RAS.
	Primary Clarifier Effluent	S	Gray
Secondary-Tertiary	Aeration Tanks	IN	Five tanks. Three passes each tank. Diffused air. Fine bubble.
	Blowers	IN	Four units. Two small and two large. One in use. Others on standby.
	Pre-aeration Chamber (Settled)	IN	Adds air to primary effluent before entering aeration tanks. (Ferrous added here)
	RAS Pumps/Channel	IN	RAS is pumped to the aeration tanks in an aerated channel. Three pumps; one out and portable being used.
	Final Clarifiers	IN	Four tanks. All in service. Ultrasonic on #1 to reduce algae.
	Final Clarifier Pump Station	IN	Three vertical turbine pumps; used during wet weather
	Final Clarifier Effluent	S	Clear
	Nitrification Towers	IN	Two units/plastic media. Will treat final clarifier effluent during dry weather, primary effluent during wet weather.
Other	Flow Meter and Recorder	IN	Magmeter
	Records	S	See inspection forms.
	Lab Controls	S	See lab inspection form.
	Automatic Samplers	IN	Three units. Raw, Final and station 604.
Sludge Disposal	Anaerobic Digesters	IN	Two primary, one secondary. Three used for gas storage.
	Temperature and pH	S	Currently running Class B and sending to landfill.
	Gas Production	IN	Used to power boiler and heat the building.
	Heating Equipment	IN	3 boilers and a heat exchanger.
	Sludge Pumps	IN	Two WAS pumps, 325,000 gpd.
	Gravity Thickeners	IN	Two tanks. North used as a thickener, South used for County's Sludge.
	Gravity Thickner pumps	IN	Two digester feeds, one piston (scum), two cyclone degritters.
	Sludge Storage Tanks	IN	Two tanks. Feeds belt press.
	Belt Presses	IN	Three units. One on standby. About 22-26 % solids off.
	Chemical Addition	OUT	N-Viro process. Lime (2 silos), fly ash (2 silos) and polymer (3 tanks) added. Not currently used.
	Windrow Building/Canopy	IN	Four bunkers for class A sludge storage. Canopy used for Class B storage
	Disposal of Sludge	S	Landfilled

CONDITION OR APPEARANCE		RATING	COMMENTS
Disinfection	Disinfection System	IN	Sodium hypochlorite disinfection. Two addition locations (603 and 604). Two Tanks.
	Chlorine contact tanks	S	4 tanks
	Effective Dose	S	Parasaltic pumps, 4 units on chlorine feed and 4 units on dechlorination
	Dechlorination	IN	Sodium Bisulfate. Two feed points to ensure full dechlorination. One tank.
	Final Effluent Pumps	IN	Four pumps; pump to towers.
	Final Effluent	S	Clear and colorless with no noticeable odor.

SWPPP Notes:

Comprehensive annual Report for the MS4, not the plant.

Don't need to include off-site pump stations

The map shows areas (grid, screening, septage receiving, sludge storage), but it is not easy to read. Perhaps include the county's unloading area.

Include a brief description of pollutant sources (sludge, chemicals, septage/hauling unloading areas)

Page 79-105; pages 106-110 appear to be notes from an MS4 inspection.