

Strategies for Compliance Assistance

- Why is assistance needed?
- Strategies: Administrative and Hands-on.
- Package Plant Process Control
- Hands-on case study



Why is Assistance Needed?

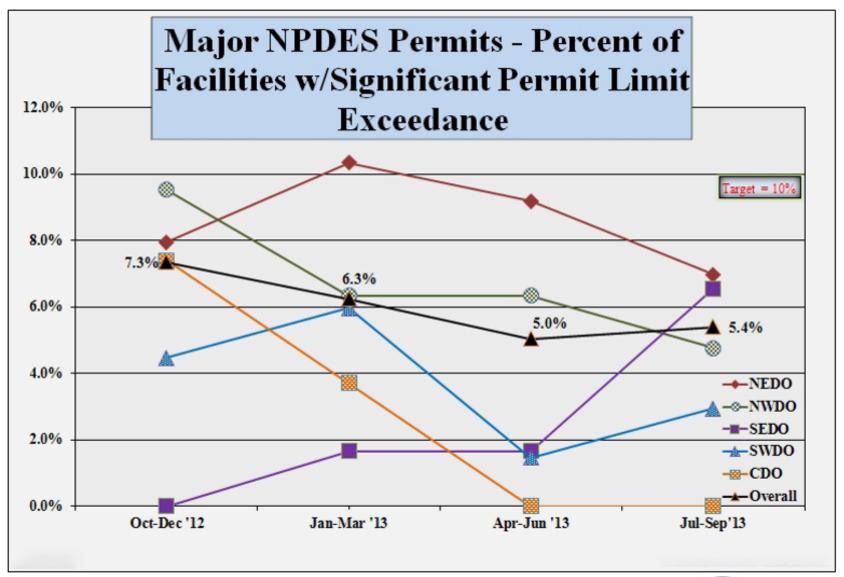
- In 2012
 - Seven to eight percent non-compliance rate for major facilities.
 - Half of the national average.
 - 22 percent non-compliance rate for minor facilities.
 - More than 300 facilities not compliant with effluent limits.



Significant Non-Compliance (SNC)

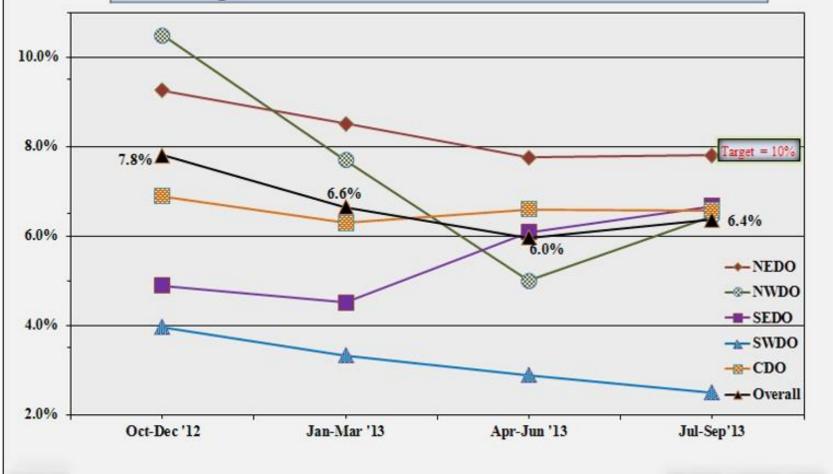
- 40 percent exceedance of conventional pollutant for two or more months during six-month review period.
- 20 percent exceedance of toxic pollutants for two or more months during six-month review period.
- Violation of the same parameter for four or more months during six-month review period.







Minor NPDES Permits- Percent of Facilities w/Significant Permit Limit Exceedance





Compliance Rates

	October -December 2012			January - March 2013			April - June 2013			July - September 2013		
	# in SNC	Total permits	%	# in SNC	Total permits	%	# in SNC	Total permits	%	# in SNC	Total permits	%
Major	18	245	7.30%	19	304	6.30%	14	278	5.00%	15	278	5.40%
Minor	248	3180	7.80%	211	3176	6.60%	190	3178	6.00%	203	3190	6.40%
All	266	3425	7.80%	230	3480	6.60%	204	3465	5.90%	218	3468	6.30%



Administrative Strategy: Preliminary Compliance Review (PCR)

- Screening of all DMRs submitted within 24 hours.
- PCRs are sent to email address attached to eDMR account.
- NPDES permit requires response to Ohio EPA.



Administrative Strategy: Notice of Violation (NOV)

- NOVs are issued based off DMRs that are submitted to Ohio EPA.
- Include a list of violations, language regarding possible penalty, description of steps to return to compliance.



Administrative Strategy: NOV Response

- If the violation was intermittent, explain why.
- If the WWTP has already taken steps to address the violation, provide details of actions.
- If the violation still needs to be addressed, provide a timeline with specific actions that you will complete to come back into compliance.

Protection Agency

Administrative Strategy: Significant Non-Compliance (SNC) List

- SNC list generated and reviewed quarterly.
- Facilities in SNC are contacted by district staff.
- Ohio EPA staff must complete a Compliance and Enforcement plan.



Administrative Strategy: Compliance and Enforcement Plans (CEPs)

- CEPs are drafted by the district office to document a facility's return to compliance approach.
- Reviewed by enforcement supervisor and Central Office staff.
- Used as a basis for enforcement cases.



Hands-on Strategy:

- Ohio EPA staff work with the operator to determine the causes for non-compliance.
- Onsite visit with Ohio EPA staff, utilizing tools to evaluate the plant performance.



Ohio EPA Compliance Assistance Unit





NWDO Hands-on Strategy

 NWDO staff received training and guidance from the Ohio EPA Compliance Assistance Unit. Presentations and hands-on days in the field.

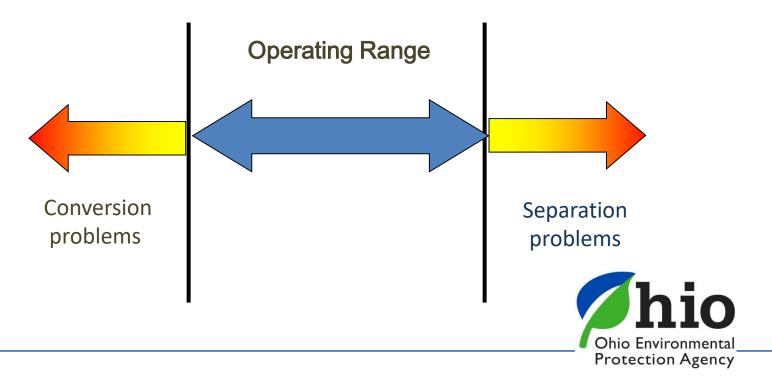
 NWDO-DSW manager approves purchase of compliance assistance tools and inspectors start using it while inspecting package plants.



Controlling the Activated Sludge System

Two Key concepts:

- 1. Convert organic waste into bugs
- 2. **Separate** bugs from treated water

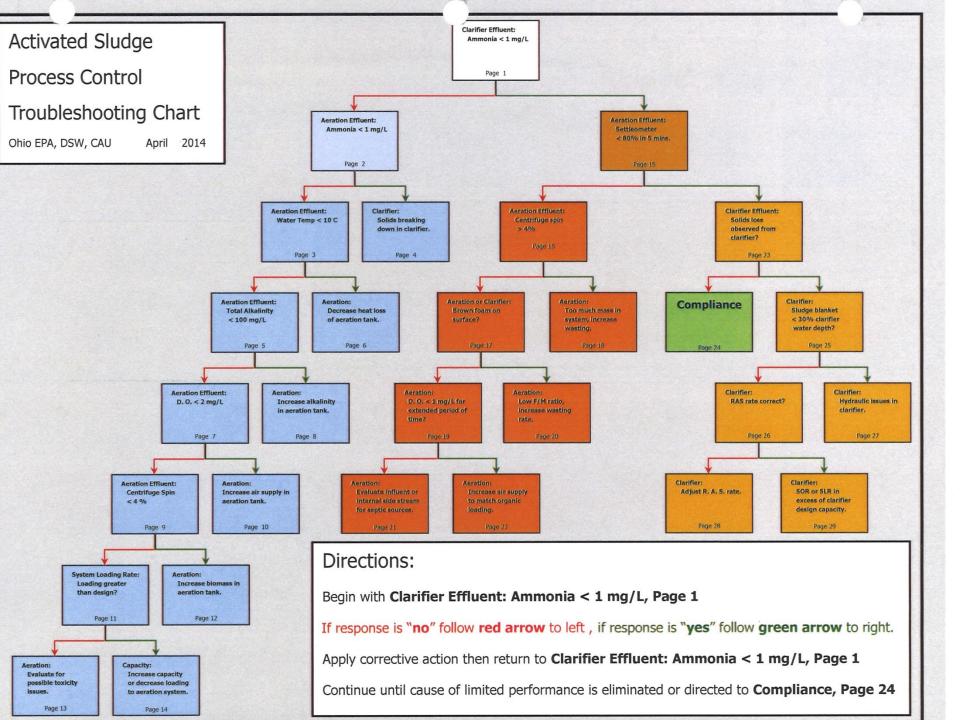


Approach to Evaluating a Plant

- Conversion
 - Ammonia to Nitrate-Nitrite
 - Alkalinity

- Separation
 - Keeping solids in the WWTP





Ammonia Test Kit



- Check clarifier effluent
 Ammonia to verify
 conversion is complete.
- Goal is < 1.0 mg/l
- Five-minute test
- 130 tests for less than \$10
- Non-reportable method



Alkalinity Test Kit



 Ammonia > 1 mg/l indicates conversion problem.

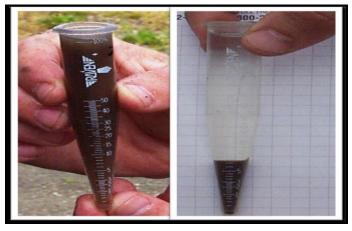
Troubleshoot

- Alkalinity (7.14 parts per 1 mg/l NH3)
- Dissolved Oxygen
- Temperature
- Clarifier Solids



Centrifuge





- 15 minutes
- Spin samples from aeration tank, clarifier, sludge returns to evaluate solids concentration



Settleometer



Guideline Parameters:

- < 800 mL in five minutes
- < 400 mL in 30 minutes



Sludge Judge





Recommend maximum clarifier blanket of 20 percent of water depth



Process Control Reporting sheet										
Date Facility Design Flow										
<u>Conversion</u>										
Clarifier effluent Ammoniamg/l Aeration tank effluent ammoniamg/l										
Alkalinity mg/l Temperature Aeration tank Dissolved Oxygenmg/l										
<u>Separation</u>										
Settlometer										
(5mins)ml (10mins)ml (15mins)ml (20mins)ml (25 mins)ml										
(30mins)ml										
Core Sampler										
sludge depthft										
% of side water depth										
Centrifuge Spin 15 min										
RAS % (target double the aeration basin%)										
Aeration tank % (range 2% to 4%)										



NWDO Success

- NWDO staff and operators work together to evaluate plant and let results guide the conclusion.
- Improved plant operations and better understanding of issues help facilities return to compliance sooner.
- Facilities can purchase low-cost equipment and use strategies to remain in compliance.



NWDO Success

- Fosters collaborative relationship between NWDO staff and plant operators and facility owners.
- Helps improves skills of NWDO inspectors.

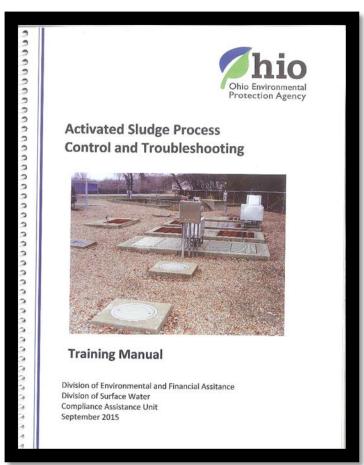


 In 2015, Ohio EPA partnered with the Ohio Water Development Authority (OWDA) to create a structured program to offer this assistance to small wastewater treatment plants across the state free of cost.



 A training session (five contact hours: in-class and onsite)

 An Activated Sludge Process Control and Troubleshooting Manual





Process Control Tool Kit

- Ammonia Test Kit
- Orthophosphate Test Kit
- Settleometer
- Alkalinity Test Kit
- Core Sampler









District Office Tool Library

- 10 Centrifuges
- 10 Dissolved Oxygen Meters
- Operators that attend training can borrow this higher cost equipment for use at their plant







- November 2015 NWDO Training in Fremont
 - Morning session Presentation of Concepts
 - Afternoon hands-on session using tools

- 74 facilities on SNC list invited to NWDO training
- 43 facilities attended



Positive Feedback

"The tools and training have been a big help and I have seen an improvement in both of my plants since implementing them. Thank you for the learning opportunity and for providing me with some helpful tools".

- A plant operator



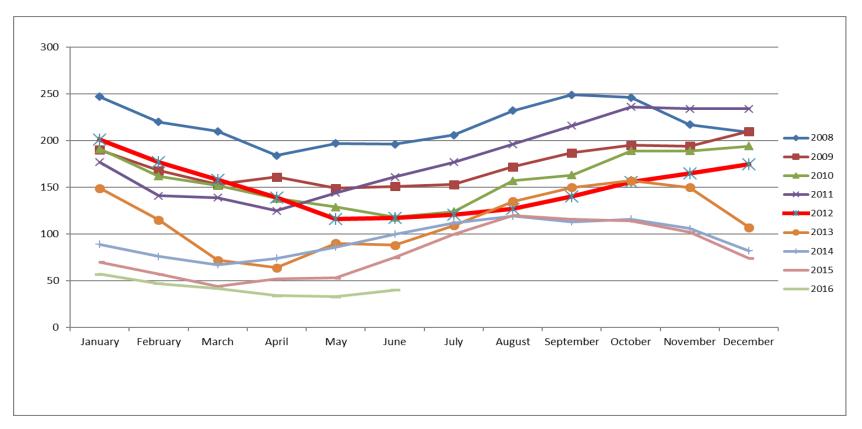
Positive Feedback

Thank you and your team for hosting this workshop and also for the operational tools. This collaboration between treatment operators and the EPA is a must to secure the future of our valuable resources. Thank you again.

- A Village Wastewater Director



How are we doing? NWDO Stations in SNC 2008 - 2016





How are we doing after one year?

- As of October 2016:
 - 37 of 43 NWDO systems have returned to compliance following the training
 - NWDO continues to work with the six facilities in SNC
 - –D.O. Meters and centrifuges from the Tool Library are now available to all facilities within NWDO

Protection Agency

Summer 2016 Case Study

NWDO Staff and CAU use tools to evaluate a WWTP upset and help the facility return to compliance.



Background







Background

- Facility notifies NWDO that they experienced an upset event in late May, early June, 2016.
- Effluent sample results indicated high ammonia, high BOD, high Total Suspended Solids and high E.coli.
- Facility tries several things to aid in plant recovery but has minimal success.



Background

- Facility contacts DEFA and requests helps from compliance assistance unit.
- Jon VanDommelen and NWDO staff visit the plant and use the tools and "work the chart" to evaluate plant conditions.
- Facility consists of oxidation ditch, two final clarifiers, aerobic digestion and UV disinfection and has a design flow of 1MGD.



The NWDO Compliance Unit





Five-Minute Settleometer



Sample of oxidation ditch effluent.

 Five-minute Settleometer reading of 910.

 Remember — should be less than 800.



Two-Minute Diluted Settlometer



 Half oxidation ditch effluent and half clarifier effluent.

Two-minute reading of 800.



Dissolved Oxygen Meter



 Raw Influent D.O. reading was – 4.99 mg/l.

 Across 3 rings of oxidation ditch average D.O. was 0.30 mg/l.



Conversion Tools: Centrifuge





- Spun samples from each ring of oxidation ditch to evaluate solids concentration.
- Readings across the ditch of approximately 5.0.



Ammonia Readings



- Readings across the oxidation ditch were high.
- Outer Ring 22.0 mg/l
- Inner Ring 8.0 mg/l
- Goal of less than 1.0 at end of aeration



What to do?

 Need to increase dissolved oxygen levels in oxidation ditch.

Raised weir on ditch to increase the depth of

rotors in the water.





Step 1 – Increase Wasting



- Need to waste sludge from the system.
 - Increased sludge wasting pump rate.
 - Use centrifuge spin to monitor progress.
 - Target spin of 2.5.



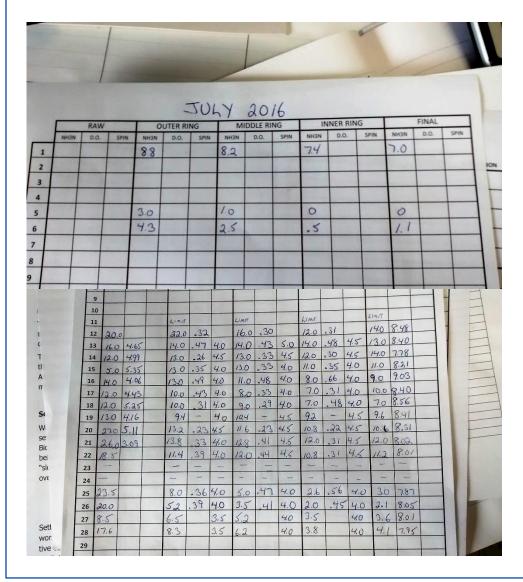
Step 2 - Increase D.O.



- Need to increase dissolved oxygen levels in oxidation ditch.
 - Raised weir on ditch to increase the amount of rotors in the water, which helped increase D.O.



Is it working???



Record the results and let them guide you!!



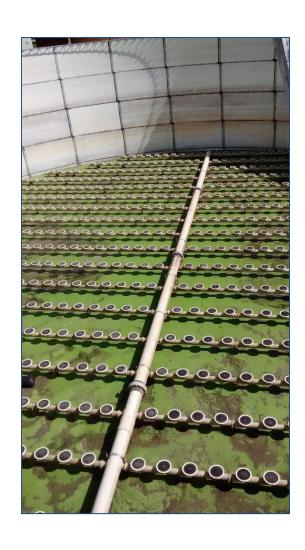
Too Many Solids



- Facility digesters and sludge holding tanks are full.
- Need room to waste sludge from plant.
- Starts wasting to old drying beds with polymer and contracts with a hauler to haul liquid.



Sludge has been hauled







Results

 With slow and steady effort by the facility operators, as the solids in the system went down the D.O. increased, the ammonia values went down and settling improved and effluent was back into compliance.



Results

- The operators ran process control tests daily all summer and determined their operational window.
- Operators no longer pull effluent samples and worry until results are back. The process control tests give them confidence that the plant is operating in compliance.
- Facility has purchased their own equipment so that operators can do process control testing and make adjustments based on results.

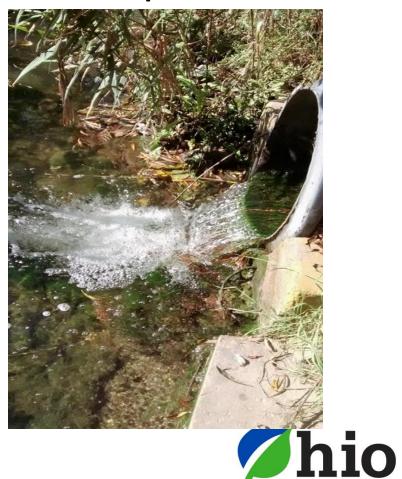


Results

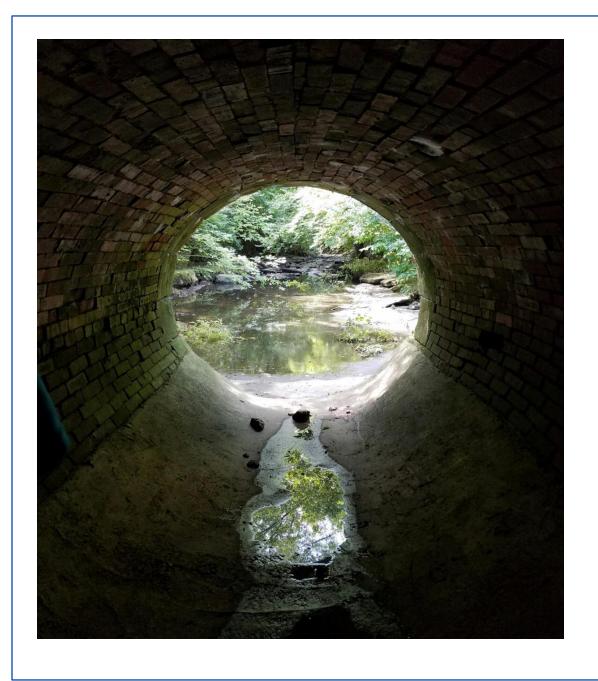
Effluent June 2016



Effluent September 2016



Ohio Environmental Protection Agency



Questions



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