

City of Upper Sandusky, Ohio CSO Public Notification Plan

US EPA NPDES Permit No. OH0020001

Ohio EPA NPDES Permit No. 2PD000039

Submittal Date: August 1, 2018

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1. INTRODUCTION

US EPA has finalized a new rule, *Public Notification Requirements for Combined Sewer Overflows to the Great Lakes (83 FR 712)* (CSO Public Notice Rule), published January 8, 2018 effective February 7, 2018 to establish public notification requirements for combined sewer discharges to the Great Lakes Basin. The rule applies to all permitted NPDES discharges in the Great Lakes Basin that have combined sewer overflows (CSOs).

The City of Upper Sandusky, Ohio (City) is located in Wyandot County which is in the Great Lakes Basin. The City operates a wastewater treatment plant (WWTP) located at 155 Indian Mill Drive, Upper Sandusky, Ohio. The WWTP is permitted under the NPDES Program as US EPA permit number OH0020001 and Ohio EPA permit number 2PD000039. The WWTP discharges to the Sandusky River. There are eight (8) combined sewer overflows in the collection system that discharge to the Sandusky River and unnamed tributaries of the Sandusky River. The City has developed the following CSO Notification Plan in accordance with the requirements of the Combined Sewer Overflow Public Notification Requirements for the Great Lakes.

2. EXISTING COMBINED SEWER OVERFLOWS

2.1 CSO Outfall Locations

The City is authorized to discharge from the combined sewer overflows designated as NPDES Permit stations 052-058 during wet weather periods when the flow in the sewer system exceeds the capacity of the sewer system. The location and receiving stream for each CSO is shown in **Table 2-1**.

Table 2-1 : CSO Discharge Locations

Ohio EPA NPDES Permit Station Number	Description	Receiving Stream
2PD00039052	W. bank, behind 777 N. Sandusky St. (Lat: 40N 50' 24"; Long: 83W 16' 43") Regulators 1425 and 1429	Unnamed Tributary of Sandusky River
2PD00039053	E. bank, SW corner of 800 Mission Dr. (Lat: 40N 50' 20"; Long: 83W 16' 43") Regulators 1451, 5818, and 5860	Unnamed Tributary of Sandusky River
2PD00039054	W. bank, 633 N. 5th St. (Lat: 40N 50' 17"; Long: 83W 16' 47") Regulators 1330, 1333, 1466, and 1472	Unnamed Tributary of Sandusky River
2PD00039055	W. bank, East edge of golf course (Lat: 40N 49' 40"; Long: 83W 16' 15") Regulator 5934	Sandusky River
2PD00039056	W. bank, rear of 333 S. 4th St. (Lat: 40N 49' 25"; Long: 83W 16' 34") Regulator 5963	Sandusky River
2PD00039057	W. bank, south of 333 S. 4th St. (Lat: 40N 49' 24"; Long: 83W 16' 39") Regulator 1117	Sandusky River
2PD00039058	W. bank, rear of 513 S. Sandusky Ave. (Lat: 40N 49' 11"; Long: 83W 16' 46") Regulator 1525	Sandusky River
2PD00039059	W. bank, north side of High St. (Lat: 40N 48' 51"; Long: 83W 16' 31") Regulator 6082	Sandusky River

2.2 CSO Signage Language

The Upper Sandusky Wastewater Department has primary responsibility for determining when to post notices of polluted surface water bodies or ground surfaces that result from uncontrolled wastewater discharges from its facilities. The postings do not necessarily prohibit use of recreational areas, unless posted otherwise, but provide a warning of potential public health risks due to sewage contamination. Generally, signs are posted where sewage enters a water body, where an overflow area cannot be cleaned, or when directed by regulatory agencies. Signage is required at NPDES designated CSO discharge points. An example of an existing sign at a City CSO outfall is shown in **Figure 2-1**. The

existing CSO signs name the City of Upper Sandusky as the Great Lakes Basin CSO Permittee, include a description of the discharge, the NPDES permit number, the CSO discharge point number, and the City's telephone number. Signs are regularly inspected in late spring to ensure no flooding or ice flows have caused damage. The signs are also inspected in late July or early August, when it is dry, to cut any brush and trim weeds to ensure they are not obstructed such that persons in boats or someone walking along the shore cannot read the sign. The signs will be replaced, if missing, and only removed under the direction of the WWTP Superintendent.

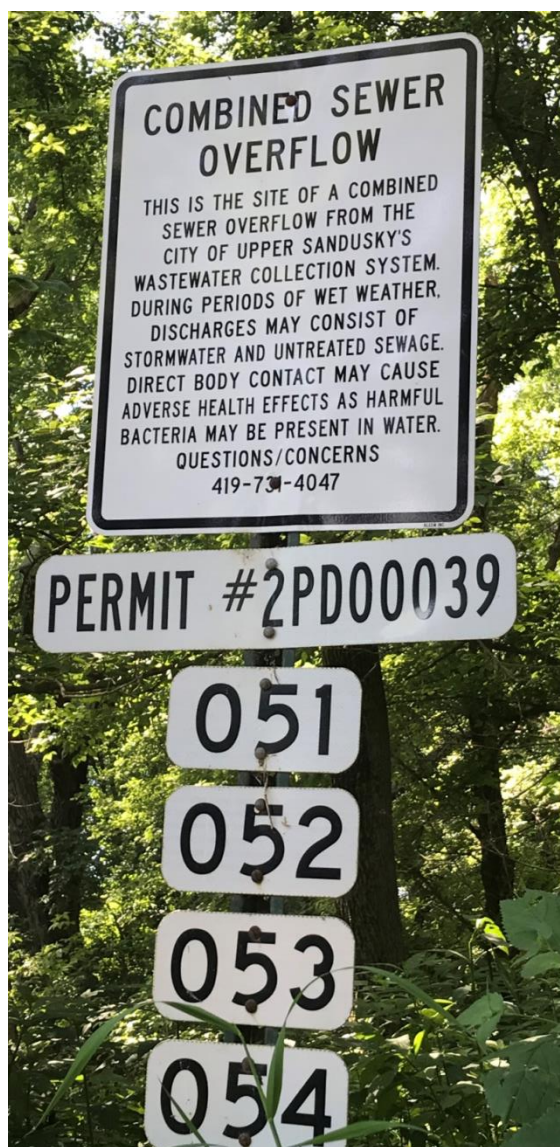


Figure 2-1 : Existing CSO Sign

2.3 CSO Monitoring Procedure

The City's NPDES monthly reporting parameters for the CSO stations include TSS (mg/L), CBOD (mg/l), Overflow Occurrence (No./Month), and Overflow Volume (Million Gallons). Currently, two (2) methods of monitoring are used at different CSO discharge locations to collect and report monthly NPDES Permit data.

CSO stations 052-057 are equipped with flow monitoring instruments that capture data that can be used for volume and duration reporting. Currently, the City checks the flow meters when the WWTP flow reaches 3.0 MGD. The flow meters collect data at five (5) minute intervals and the City staff is able to access the data through the Hach flow meter website at <https://fsdata.hach.com/>. Typically, the data is available in near real-time, however, equipment malfunction or other unforeseen circumstances can interfere with the equipment functionality.

CSO stations 058 and 059 are lift station overflows that are passively monitored using the block method. A wooden block is tied to a rope and suspended in the overflow pipe and the overflows are observed weekly to see if wood has moved down stream indicating flow went into pipe. These stations are typically not active while the pumps are operating normally. CSO occurrences, volume and duration are estimated at stations 058 and 059.

3. INITIAL FOUR HOUR PUBLIC NOTICE

The City monitors the existing CSO locations as described in **Section 2.3**. Within four (4) hours of becoming aware that a CSO discharge has occurred, the local health department, the public, and any other potentially affected public entities are required to be informed. The four hour window begins when the City becomes aware of the overflow, so occurrences that happen during regularly unstaffed hours (e.g. Sunday) can be reported within four hours of employees reporting to work (e.g. within four hours of 7am on Monday morning).

The Upper Sandusky Water Treatment Plant draws water from reservoirs that are fed from the Sandusky River upstream of all City CSO locations and therefore is not required to be notified of CSO discharges. The City Parks & Recreation Department does not promote river access points at any of the City parks. The City has identified Wyandot County Public Health as the sole public entity that requires four-hour notification of CSO discharges under the CSO Public Notice Rule. In addition, the City will provide four-hour notice to the general public via the City public access page at: <https://uppersanduskyoh.com/wastewater/>. The City Auditor's Assistant is the City's webmaster and will be responsible for updating the City's web page with CSO discharge information. The contact information for Wyandot County Public Health and the Auditor's Assistant are shown in **Table 3-1**.

3.1 CSO Four Hour Public Notification Form

The City has developed a standard CSO Four Hour Public Notification Form for CSO Public Notice Rule reporting. The form is included in Appendix A. The form includes the following information required to be made available to the public:

- Water body receiving the discharge; (Sandusky River or Unnamed Tributary of Sandusky River)
- The location of the discharge and identification of the potentially impacted public access areas
- The date and time the discharge started;
- If the discharge is continuing or ended at the time of the notification; and
- A point of contact for the CSO Permittee.

3.2 CSO Four Hour Public Notice Procedure

City staff is regularly available to review CSO activity data Monday – Friday 7am-3pm. The following CSO Four Hour Public Notice Procedure should be followed when a precipitation event occurs during staffed hours and at the beginning of Monday morning shifts:

- 1) When the WWTP influent flow reaches 3.0 MGD check CSO flow monitors for activity.
 - a) Check flow monitors Monday mornings for activity during unstaffed weekend hours.
- 2) If flow monitors show activity, complete a CSO Four-Hour Public Notice form.
- 3) Send the completed form to the following email addresses with the subject line *"Upper Sandusky WWTP 4-hour CSO Notification"*.
 - DKeller@uppersanduskyoh.com
 - envhealth@co.wyandot.oh.us
 - Cmattimoe@uppersanduskyoh.com

- 4) Make the form available on the City Wastewater Website at <https://uppersanduskyoh.com/wastewater/> within four hours of the time of discovery of a discharge.

Table 3-1 : Points of Contact for CSO Four-Hour Notification

Agency / Entity	Name, Title & Email
Wyandot County Public Health	Jeff Ritchey Director of Environmental Health envhealth@co.wyandot.oh.us
Upper Sandusky Webmaster	Carrie Mattimoe Auditor's Assistant Cmattimoe@uppersanduskyoh.com

4. SUPPLEMENTAL SEVEN DAY NOTICE

Beginning on or before November 7, 2018, the City must provide additional information for CSO discharge events within 7 days of becoming aware the discharge has ended. The end of the CSO discharge and the volume discharged during the event will be estimated at the time the plant flow drops back below the 3.0 MGD threshold. CSO flow meters will be used to verify when a discharge has completely ended. CSO volume and duration will be generated using flow meter data for CSO station 052-057 and estimated for CSO station 058 & 059.

Seven day supplemental public notice will be made available to the general public on the City's public access website at: <https://uppersanduskyoh.com/wastewater/>. Wyandot County Public Health and the City of Upper Sandusky Webmaster will be contacted directly via email for the supplemental seven day notice. Contact information is provided in **Table 4-1**.

4.1 CSO Seven Day Public Notification Form

The City has developed a standard CSO Seven Day Public Notification Form for CSO Public Notice Rule reporting. The form is included in Appendix B. The form includes the following information required to be made available to the public:

- The measured volume of discharge in millions of gallons (if there were multiple discharges in an event, the total volume from all outfalls may be estimated)
- The approximate time the discharge ended

4.2 CSO Seven Day Public Notice Procedure

Following the four hour notification procedure, seven day supplemental public notice is also required. The following CSO Seven Day Public Notice Procedure should be followed within seven days of becoming aware that a CSO discharge has ended:

- 1) When plant flow drops to 3.0 MGD check CSO flow monitors for activity.
 - a) Check flow monitors Monday mornings for activity during unstaffed weekend hours.
- 2) If flow monitors indicate a discharge has ended, fill out the CSO Seven-Day Notification Form.
 - a) Data in the form for CSO Stations 052-057 should be completed using data from flow monitors
 - b) Data in the form for CSO Stations 058-059 should be estimated
- 3) Send the completed form to the following email addresses with the subject line "*Upper Sandusky WWTP 7-day CSO Notification*".
 - DKeller@uppersanduskyoh.com
 - envhealth@co.wyandot.oh.us
 - Cmattimoe@uppersanduskyoh.com
- 4) Make the form available on the City Wastewater Website at <https://uppersanduskyoh.com/wastewater/> within seven days of the time of discovery of the end of a discharge.

Table 4-1 : Points of Contact for Supplemental Seven Day Public Notification

Agency / Entity	Name, Title & Email
Wyandot County Public Health	Jeff Ritchey Director of Environmental Health envhealth@co.wyandot.oh.us
Upper Sandusky Webmaster	Carrie Mattimoe Auditor's Assistant Cmattimoe@uppersanduskyoh.com

5. ANNUAL NOTICE

Starting February 7, 2019, an annual notification will be submitted to the US EPA and Ohio EPA NPDES Director by May 1 of each calendar year.

The Annual Notice will be emailed to the US EPA at NPDES_CS0@epa.gov and to the Ohio EPA NPDES Director. The City will provide the annual notice to the public via the City's public access website at: <https://uppersanduskyoh.com/wastewater/>. The annual notification will include the contact information for the person responsible for maintaining the website including name, title, phone number and email. The City Auditor's Assistant, is currently responsible for maintaining the website.

At a minimum, the annual notice will include:

- A description of the location and receiving water for each CSO discharge point, and, if applicable, any treatment provided. If a CSO previously mentioned has been eliminated, this shall be noted;
- The date, location, approximate duration, measured or estimated volume, and cause of each wet weather CSO discharge that occurred during the past calendar year;
- The date, location, duration, volume and cause of each dry weather CSO discharge that occurred during the past calendar year;
- A summary of available monitoring data and discharge monitoring reports (DMRs) for CSO discharges from the past calendar year;
- A description of any public access areas potentially impacted by each CSO discharge;
- If precipitation was the cause of a discharge, the representative precipitation data in total inches, to the nearest tenth of an inch (0.1") that resulted in a CSO discharge;
- A concise summary of the implementation of the nine minimum controls and the status of the implementation of the LTCP or other plans to reduce or prevent CSO discharge. This summary must include a description of key milestones remaining in the LTCP schedule and a description of the average annual number of CSO discharges anticipated upon completion of the LTCP.

6. PUBLIC ENTITY INPUT SUMMARY

In accordance with the CSO Public Notice Rule, this public notification plan was sent to Wyandot County Public Health for review and comment. The Director of Environmental Health has been identified as the point of contact for this public entity.

The comments received were all related to contact information provided in this plan. The public entity name, the point of contact's title, and the contact email address were all updated as result of the public entity input.

Appendix A
CSO Four-Hour Public Notification Form

City of Upper Sandusky

CSO Four-Hour Public Notification Form

Point of Contact: City of Upper Sandusky, Wastewater Treatment, Doug Keller, 419-310-3083

Date/Time of CSO Discovery: _____

NPDES Permit Number: 2PD000390

CSO Discharge (Check All that Apply)	☐	☐	☐	☐	☐	☐	☐	☐
CSO Station Number	052	053	054	055	056	057	058	059
CSO Location	W. Bank, Behind 777 N. Sandusky St.	E. Bank, SW Corner of 800 Mission Dr.	W. Bank, 633 N. 5th St.	W. Bank, East Edge of Golf Course	W. Bank, Rear of 333 S. 4th St.	W. Bank, South of 333 S. 4th St.	W. Bank, Rear of 513 S. Sandusky Ave.	W. Bank, North Side of High St.
Receiving Water Body	Unnamed Tributary of Sandusky River	Unnamed Tributary of Sandusky River	Unnamed Tributary of Sandusky River	Sandusky River	Sandusky River	Sandusky River	Sandusky River	Sandusky River
Date CSO Started								
Time CSO Started								
Date CSO Ended*								
Time CSO Ended*								

Notes:

* - Enter "CD" if the CSO is still currently discharging at the time this notification is completed.

Comments: _____

Completed forms should immediately be sent to the following email addresses with the subject line: *Upper Sandusky WWTP 4-hour CSO Notification*
DKeller@uppersanduskyoh.com; envhealth@co.wyandot.oh.us; Cmattimoe@uppersanduskyoh.com

This form must be made available on the City Wastewater Website at: <https://uppersanduskyoh.com/wastewater/> within four hours of the time of discovery listed above.

Appendix B
CSO Seven-Day Public Notification Form

Two thin, parallel blue lines originate from the bottom right corner and extend diagonally upwards and to the left, crossing the text area.

City of Upper Sandusky

CSO Seven-Day Public Notification Form

Point of Contact: City of Upper Sandusky, Wastewater Treatment, Doug Keller, 419-310-3083

Date: _____

NPDES Permit Number: 2PD000390

CSO Discharge (Check All that Apply)	☐	☐	☐	☐	☐	☐	☐	☐
CSO Station Number	052	053	054	055	056	057	058	059
CSO Location	W. Bank, behind 777 N. Sandusky St.	E. Bank, SW Corner of 800 Mission Dr.	W. Bank, 633 N. 5th St.	W. Bank, East Edge of Golf Course	W. Bank, Rear of 333 S. 4th St.	W. Bank, South of 333 S. 4th St.	W. Bank, Rear of 513 S. Sandusky Ave.	W. Bank, North Side of High St.
Receiving Water Body	Unnamed Tributary of Sandusky River	Unnamed Tributary of Sandusky River	Unnamed Tributary of Sandusky River	Sandusky River	Sandusky River	Sandusky River	Sandusky River	Sandusky River
Date CSO Ended								
Time CSO Ended								
Volume of Discharge* (Million Gallons)								

Notes:

* If multiple discharges occurred in this event, include the total volume from all outfalls

Comments:

Completed forms should immediately be sent to the following email addresses with the subject line: *Upper Sandusky WWTP 7-Day CSO Notification*
DKeller@uppersanduskyoh.com; envhealth@co.wyandot.oh.us; Cmattimoe@uppersanduskyoh.com

This form must be made available on the City Wastewater Website at: <https://uppersanduskyoh.com/wastewater/> within seven days of the time of becoming aware the discharge has ended.