

Ministry of the
Environment,
Conservation and Parks
Drinking Water and
Environmental
Compliance Division
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Ministère de l'Environnement
de la Protection de la nature et
des Parcs
Division de la conformité en
d'eau potable et
d'environnement Direction
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****Sent via email****

April 22, 2022

Township of North Wellington
7480 Sideroad 7 W, PO Box 125
Kenilworth, Ontario
N0G 2E0

Attention: Matthew Aston, Director of Operations

Re: Arthur Wastewater Treatment Plant Inspection Report

On March 11, 2022, the Arthur Wastewater Treatment Plant was inspected by the Ministry of the Environment, Conservation and Parks.

Please find attached a copy of the Inspection Report #1-1RVMQ9.

If you wish to discuss the results of the inspection in more detail, please feel free to contact me at (519) 837-7457.

Yours truly,

Signature: (Provincial Officer)
A handwritten signature in black ink, appearing to be "CS", written over a faint, larger signature.

Carola Serwotka
Provincial Officer
Drinking Water and Environmental Compliance Division
Guelph District Office
West Central Region

c.c.

Don Irvine, Senior Operations Manager, OCWA (email)
Melissa Cortes, PCT, OCWA (email)
Mark Anderson, Water Quality Engineer, GRCA (email)
Guelph District Office File: SI WE WN PR
Electronic binder



Arthur Water Pollution Control Plant
160 PRESTON ST S, WELLINGTON NORTH, ON, N0G 1A0

Inspection Report

System Number: 110000882

Entity: ONTARIO CLEAN WATER
AGENCY
THE CORPORATION OF THE
TOWNSHIP OF WELLINGTON
NORTH

Inspection Start Date: 03/11/2022

Inspection End Date: 04/22/2022

Inspected By: Carola Serwotka

Badge #: 808

Signature: (Provincial Officer)



NON-COMPLIANCE/NON-CONFORMANCE ITEMS

The following item(s) have been identified as non-compliance/non-conformance, based on a "No" response captured for a legislative or best management practice (BMP) question (s), respectively.

Question Group: Effluent Quality and Quantity

Question ID	942800	Question Type	BMP
Question: Do the sewage works effluent sample results meet the effluent objectives stated in the Environmental Compliance Approval?			
Legislative Requirement	Not Applicable		
Observation/Corrective Action(s)			
The sewage works effluent sample results did not meet the effluent objectives stated in the Environmental Compliance Approval. Objectives were not in effect until the end of Phase 1 construction, which was December 2020. According to Annual reports objectives were exceeded on: cBOD - Feb 2021 TSS - Mar, April and Nov 2021 TP - Feb and Mar 2021 TAN - Feb, Mar and April 2021			

Question ID	942200	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with total phosphorus limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation/Corrective Action(s)			
The sewage works effluent sample results did not demonstrate compliance with total phosphorous limits prescribed by the Environmental Compliance Approval. In February and March 2021 - TP was exceeded where the limit was 0.25 mg/L for the monthly average. In February and March, 2021, the TP loading limit of 0.47 kg/d was exceeded. During the upgrade construction, a new chemical addition tank was installed outside the WPCP, this tank did not have sufficient insulation for the winter months. The tank was later replaced.			

Question ID	942400	Question Type	Legislative
Question:			

Do sewage works effluent sample results show compliance with total ammonia/total ammonia nitrogen/unionized ammonia limits prescribed by the Environmental Compliance Approval?	
Legislative Requirement	OWRA 53 (1);
Observation/Corrective Action(s)	
The sewage works effluent sample results did not demonstrate compliance with total ammonia/total ammonia nitrogen/unionized ammonia limits prescribed by the Environmental Compliance Approval. In March, April, May, September, November and December 2019 the monthly TAN limit of 2.3 mg/L was exceeded. In January, February, March and April 2020 the TAN limit of 2.3 mg/L was exceeded. The monthly TAN limit increased to 3.5 mg/L for the above months after completion of Phase I, after December 2020. The 2020 annual average limit of 1.5 mg/L for TAN was exceeded. There were issues with discharges from a commercial business for several years that caused high concentrations of total ammonia nitrogen during this inspection period. These discharges are now monitored bi-weekly by the Township and the operators.	

Question ID	942500	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with microbiological parameter limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation/Corrective Action(s)			
The sewage works effluent sample results did not demonstrate compliance with microbiological parameter limits prescribed by the Environmental Compliance Approval. In December 2019, February and March 2020 the monthly geometric mean density limit of 200 CFU/100mL was exceeded.			

Question ID	942100	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with total suspended solids limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation/Corrective Action(s)			
The sewage works effluent sample results did not demonstrate compliance with total suspended solids limits prescribed by the Environmental Compliance Approval. In April 2020, the TSS monthly average concentration was exceeded where the limit was 15 mg/L.			

In March and April, 2021 the loading limit of 18.6 kg/d was exceeded. These exceedances occurred during drawdown of the holding ponds.

INSPECTION DETAILS

This section includes all questions that were assessed during the inspection.

Ministry Program: SEWAGE | **Regulated Activity:**

Question ID	940100	Question Type	Legislative
Question: Does a valid Environmental Compliance Approval(s) exist for the facility?			
Legislative Requirement	OWRA 53 (1); OWRA 53 (2);		
Observation			
The owner had a valid Environmental Compliance Approval for the sewage works. The Arthur WPCP began construction in 2019 to expand the rated capacity from 1,495 m3/d to 2,300 m3/d. Phase I - 1,465 m3/d to 1,860 m3/d. Phase II - 1,860 m3/d to 2,300 m3/d. Phase I was complete at the time of this inspection. The previous ECA #3773-ABJKXX was issued November 28, 2016. An amended ECA was issued September 19, 2019, #7654-BEMKVD, and was reviewed for this inspection.			

Question ID	940202	Question Type	Information
Question: Does the facility's Environmental Compliance Approval contain conditions consistent with a modern Environmental Compliance Approval?			
Legislative Requirement	Not Applicable		
Observation			
The facility's Environmental Compliance Approval contains conditions consistent with a modern Environmental Compliance Approval.			

Question ID	940401	Question Type	Information
Question: Was the annual average daily flow below 80% of the rated capacity of the sewage works?			
Legislative Requirement	Not Applicable		
Observation			
The annual average daily flow was not approaching the rated capacity of the sewage works. Currently, the Arthur WPCP is in between Phase I and II of an expansion of the			

treatment plant. Phase I design capacity is 1,860 m3/d and at the end of Phase II, the design capacity will be 2,300 m3/d.

Question ID	940500	Question Type	Legislative
Question:			
Is the owner in compliance with the conditions associated with maximum flow rate or the rated capacity prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The owner was in compliance with the conditions associated with maximum flow rate or the rated capacity prescribed by the Environmental Compliance Approval. The maximum flow is 6,500 m3/d through sand filtration and UV disinfection before entering the Conestogo River based on the level in the river and ammonia levels.			

Question ID	940600	Question Type	BMP
Question:			
Is the owner in conformance with the designed rated capacity for average daily flow into the sewage works?			
Legislative Requirement	Not Applicable		
Observation			
The owner was in conformance with the designed rated capacity for average daily flow into the sewage works.			

Question ID	940800	Question Type	Legislative
Question:			
Are the flow measuring devices installed, calibrated and maintained in accordance with the requirements of the Environmental Compliance Approval?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		
Observation			
Flow measuring devices were installed, calibrated and maintained in accordance with the requirements of the Environmental Compliance Approval.			

Question ID	940900	Question Type	Legislative
Question: Were flow rates recorded at a frequency prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
Flow rates were recorded at a frequency prescribed by the Environmental Compliance Approval.			

Question ID	941100	Question Type	Legislative
Question: Are all monitoring equipment other than flow monitoring devices installed, calibrated and maintained in accordance with any Environmental Compliance Approval?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		
Observation			
All monitoring equipment other than flow monitoring devices were installed, calibrated and maintained in accordance with any Environmental Compliance Approval.			

Question ID	941700	Question Type	Information
Question: On the day of the inspection, was the sewage works effluent essentially free of foreign substances?			
Legislative Requirement	Not Applicable		
Observation			
The sewage works effluent was essentially free of foreign substances on the day of the inspection.			

Question ID	941800	Question Type	Information
Question: On the day of inspection, was there no obvious evidence of groundwater/surface water impact?			
Legislative Requirement	Not Applicable		

Observation
There was no obvious evidence of groundwater or surface water impact from the sewage works on the day of inspection.

Question ID	941201	Question Type	Legislative
Question:			
Has the owner ensured that all equipment/components associated with the works have been installed in accordance with the Environmental Compliance Approval?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		
Observation			
The owner had ensured that all equipment/components associated with the works was installed in accordance with the Environmental Compliance Approval.			

Question ID	941500	Question Type	Legislative
Question:			
Does the operator-in-charge ensure that all equipment used in the treatment processes is monitored, maintained, inspected, tested and evaluated?			
Legislative Requirement	OWRA O. Reg. 129/04 18 (2);		
Observation			
The operator-in-charge had ensured that all equipment used in the processes was monitored, maintained, inspected, tested and evaluated.			

Question ID	941301	Question Type	Legislative
Question:			
Are the works, related equipment and appurtenances being operated and maintained to achieve compliance prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The works, related equipment and appurtenances were being operated and maintained to achieve compliance prescribed by the Environmental Compliance Approval.			

Question ID	941900	Question Type	Information
Question: Are the sewage works effluent limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	Not Applicable		
Observation			
The sewage works effluent limits were prescribed by the Environmental Compliance Approval.			

Question ID	942800	Question Type	BMP
Question: Do the sewage works effluent sample results meet the effluent objectives stated in the Environmental Compliance Approval?			
Legislative Requirement	Not Applicable		
Observation			
The sewage works effluent sample results did not meet the effluent objectives stated in the Environmental Compliance Approval. Objectives were not in effect until the end of Phase 1 construction, which was December 2020. According to Annual reports objectives were exceeded on: cBOD - Feb 2021 TSS - Mar, April and Nov 2021 TP - Feb and Mar 2021 TAN - Feb, Mar and April 2021			

Question ID	941600	Question Type	Legislative
Question: Where prescribed by the Environmental Compliance Approval, can the owner/operating authority demonstrate that best efforts were used to achieve the objectives listed in the Approval conditions?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The owner/operating authority was able to demonstrate that best efforts were used to achieve the objectives listed in the Environmental Compliance Approval conditions. The Arthur WPCP is in between Phase I and II of an expansion of the treatment plant. Phase I design capacity is 1,860 m3/d and at the end of Phase II, the design capacity will be 2,300 m3/d. The current expansion also includes upgrades to increase aeration capacity, pump capacity and new headworks. These upgrades allow better operation given changing influent conditions from industries that direct their high strength effluent to the WPCP.			

Question ID	943200	Question Type	Information
Question: Did the inspector collect audit samples during the inspection?			
Legislative Requirement	Not Applicable		
Observation			

Question ID	943400	Question Type	Information
Question: Are the sampling requirements prescribed by the Environmental Compliance Approval?			
Legislative Requirement	Not Applicable		
Observation			
The sampling requirements were prescribed by the Environmental Compliance Approval.			

Question ID	943500	Question Type	Legislative
Question: Were all sewage works effluent sampling requirements prescribed by the Environmental Compliance Approval being met?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		
Observation			
All sewage works effluent sampling requirements prescribed by the Environmental Compliance Approval were met.			

Question ID	944100	Question Type	Legislative
Question: Has the owner maintained the monitoring records for the period prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The owner had maintained the monitoring records for the period prescribed by the			

Environmental Compliance Approval.

Question ID	943600	Question Type	Legislative
Question: Are all sewage works influent sampling (raw sewage) requirements prescribed by the Environmental Compliance Approval being met?			
Legislative Requirement	OWRA 53 (1);		
Observation All sewage works influent (raw sewage) sampling requirements prescribed by the Environmental Compliance Approval were met.			

Question ID	944200	Question Type	BMP
Question: Has the owner maintained the monitoring records since the date of the last inspection?			
Legislative Requirement	Not Applicable		
Observation The owner had maintained the monitoring records since the date of the last inspection.			

Question ID	944400	Question Type	Information
Question: Are the reporting requirements prescribed by an Environmental Compliance Approval?			
Legislative Requirement	Not Applicable		
Observation The reporting requirements were prescribed by an Environmental Compliance Approval.			

Question ID	944301	Question Type	Legislative
Question: Were all exceedances of any prescribed parameters reported in accordance with the Environmental Compliance Approval?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		

Observation
All exceedances of any prescribed parameters were reported in accordance with the Environmental Compliance Approval.

Question ID	944500	Question Type	Legislative
Question:			
Do the annual performance reports meet the submission and contents requirements of the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The annual performance reports met the submission and contents requirements of the Environmental Compliance Approval.			

Question ID	944601	Question Type	Legislative
Question:			
Have all other reporting requirements prescribed by the Environmental Compliance Approval been met?			
Legislative Requirement	OWRA 53 (1);		
Observation			
All other reporting requirements prescribed by the Environmental Compliance Approval were met.			

Question ID	944850	Question Type	Information
Question:			
Have any bypasses/overflows occurred at the sewage works during the inspection period?			
Legislative Requirement	Not Applicable		
Observation			
Bypasses/overflows had occurred at the sewage works during the inspection period.			

Question ID	944800	Question Type	Legislative
Question:			

For all bypasses/overflows which occurred from any portion of the sewage works, did the owner/operator maintain a logbook and/or records in accordance with the Environmental Compliance Approval?	
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);
Observation	
The owner/operator maintained a logbook and/or records of all bypasses/overflows which occurred from any portion of the sewage works in accordance with the Environmental Compliance Approval. There were four bypasses/overflows during the inspection period: January 11, 2020, March 10, 2020, January 8, 2021 and May 2, 2021.	

Question ID	944900	Question Type	Legislative
Question:			
For all bypasses/overflows which occurred from the sewage treatment plant, were samples collected and analyzed in accordance with the Environmental Compliance Approval?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		
Observation			
For all bypasses/overflows which occurred from the sewage treatment plant, samples were collected and analyzed in accordance with the Environmental Compliance Approval.			

Question ID	945000	Question Type	Legislative
Question:			
For all bypasses/overflows which occurred from any portion of the sewage works, was disinfection provided in accordance with the Environmental Compliance Approval?			
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);		
Observation			
Disinfection was provided in accordance with the Environmental Compliance Approval for all bypasses/overflows which occurred from any portion of the sewage works.			

Question ID	945100	Question Type	Legislative
Question:			
Were notices and written reports provided to the Ministry for all bypasses/overflows which occurred from any portion of the sewage works in accordance with the Environmental			

Compliance Approval?	
Legislative Requirement	OWRA 16; OWRA 16.1; OWRA 16.2; OWRA 53 (1); OWRA 53 (2);
Observation	
Notices and written reports of all bypasses/overflows were provided to the Ministry in accordance with the Environmental Compliance Approval.	

Question ID	945300	Question Type	Legislative
Question: Were all required verbal notifications of discharges and/or spills provided forthwith as per O. Reg. 675/98 section 13?			
Legislative Requirement	OWRA 53 (1); OWRA 53 (2);		
Observation			
All required verbal notifications of spills were provided forthwith as per O. Reg. 675/98 section 13.			

Question ID	945500	Question Type	Information
Question: Does this plant receive sewage from a combined sewer collection system?			
Legislative Requirement	Not Applicable		
Observation			

Question ID	945700	Question Type	BMP
Question: Has a characterization study been undertaken and implemented for the system?			
Legislative Requirement	Not Applicable		
Observation			
A characterization study had been undertaken.			

Question ID	945780	Question Type	Information
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Question: Does the facility receive sludge or biosolids from another location?	
Legislative Requirement	Not Applicable
Observation	
The facility did not receive sludge or biosolids from another location.	

Question ID	945825	Question Type	BMP
Question: For lagoon treatment systems, does the owner have a program for the routine removal of sludge from the system?			
Legislative Requirement	Not Applicable		
Observation			
The owner had a program for the routine removal of sludge from the lagoon system. The holding ponds are drained and inspected each year. As the holding ponds are used to hold treated wastewater, there is minimal sediment accumulation according to the operators.			

Question ID	945850	Question Type	Legislative
Question: Do the records confirm that biosolids were transferred to a Ministry approved facility for disposal or utilization?			
Legislative Requirement	EPA 40;		
Observation			
Records confirm that biosolids were transferred to a Ministry approved facility for disposal or utilization.			

Question ID	945875	Question Type	Legislative
Question: Do records confirm that biosolids were transported for disposal or utilization by Ministry approved haulers?			
Legislative Requirement	EPA 41;		
Observation			
Records confirm that biosolids were transported for disposal or utilization by Ministry			

approved haulers.

Question ID	945900	Question Type	BMP
Question: Does the facility have a written contingency, or other management methods in place to be used in the event that the facility sludge storage capacity is not sufficient?			
Legislative Requirement	Not Applicable		
Observation			
The owner of the facility had written contingency plans or other management methods in place to be used in the event that the facility's sludge storage capacity was not sufficient. The Arthur WPCP has on-site biosolids treatment and has those treated biosolids either land applied by a third party or taken for further processing at the Lystek facility in Durham, Ontario.			

Question ID	946250	Question Type	BMP
Question: If the facility sends biosolids for land application under the NMA, is there a process in place to ensure biosolids sample results are reviewed and interpreted by the Municipality?			
Legislative Requirement	Not Applicable		
Observation			
There was a process in place to ensure biosolids sample results are reviewed and interpreted by the Municipality.			

Question ID	946300	Question Type	Legislative
Question: Is the testing for biosolids required by the Nutrient Management Act conducted by accredited laboratories?			
Legislative Requirement	NMA O. Reg. 267/03 93 (1);		
Observation			
Testing for biosolids required by legislation was conducted by accredited laboratories.			

Question ID	947100	Question Type	Legislative
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Question: Are the classification certificates of the subsystems conspicuously displayed at the workplace or at premises from which the subsystem is managed?	
Legislative Requirement	OWRA O. Reg. 129/04 4 (5);
Observation The classification certificates of the subsystems were conspicuously displayed at the workplace or at premises from which the subsystem was managed. Certificates are posted on the wall at the Arthur WPCP.	

Question ID	947600	Question Type	Legislative
Question: Do only licenced operators make adjustments to the treatment equipment?			
Legislative Requirement	OWRA O. Reg. 129/04 14-1 (1);		
Observation Only licenced operators made adjustments to the treatment equipment.			

Question ID	947700	Question Type	Legislative
Question: Have operators-in-charge been designated for the wastewater treatment plant and all associated collection facilities?			
Legislative Requirement	OWRA O. Reg. 129/04 17 (1);		
Observation Operators-in-charge were designated for the wastewater treatment plant and all associated collection works.			

Question ID	947800	Question Type	Legislative
Question: Did the operator-in-charge ensure that records were maintained of all adjustments made to the processes within his or her responsibility?			
Legislative Requirement	OWRA O. Reg. 129/04 18 (2);		
Observation The operator-in-charge ensured that records were maintained of all adjustments made to			

the processes within his or her responsibility.

Question ID	947200	Question Type	Legislative
Question: Are operator licences displayed in a conspicuous location at the workplace or at the premises from which the subsystem is managed?			
Legislative Requirement	OWRA O. Reg. 129/04 13;		
Observation			
Operator licences were displayed in a conspicuous location at the workplace or at the premises from which the subsystem was managed.			

Question ID	947300	Question Type	Legislative
Question: Has the overall responsible operator been designated for the wastewater treatment facility?			
Legislative Requirement	OWRA O. Reg. 129/04 15 (1);		
Observation			
The overall responsible operator had been designated for the wastewater treatment facility.			

Question ID	947400	Question Type	Legislative
Question: In instances where the overall responsible operator was unable to act, was an adequately licensed operator designated to act in place of the overall responsible operator?			
Legislative Requirement	OWRA O. Reg. 129/04 15 (2);		
Observation			
An adequately licensed operator was designated to act in place of the overall responsible operator when the overall responsible operator was unable to act.			

Question ID	947500	Question Type	Legislative
Question: Do all operators have the appropriate level of licences for the wastewater treatment and collection facilities?			

Legislative Requirement	OWRA O. Reg. 129/04 14-1 (1);
Observation	
All operators had the appropriate level of licences for the wastewater treatment and collection works.	

Question ID	947550	Question Type	Legislative
Question:			
Do all operators have the appropriate level of training and or experience for the wastewater treatment and collection facilities in accordance with the requirements of the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
All operators have the appropriate level of training and or experience for the wastewater treatment and collection facilities in accordance with the requirements of the Environmental Compliance Approval.			

Question ID	948000	Question Type	Legislative
Question:			
Do logs or other record keeping mechanisms for sewage works comply with the record keeping requirements?			
Legislative Requirement	OWRA O. Reg. 129/04 19 (1);		
Observation			
The logs and other record keeping mechanisms complied with the record keeping requirements. The operators use both written logsheets and electronic logsheets.			

Question ID	948100	Question Type	Legislative
Question:			
Are logs and other record keeping mechanisms available for at least two (2) years?			
Legislative Requirement	OWRA O. Reg. 129/04 19 (6);		
Observation			
Logs and other record keeping mechanisms were available for at least two (2) years.			

Question ID	948200	Question Type	Legislative
Question: Do the operations and maintenance manuals meet the requirements of the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The operations and maintenance manuals met the requirements of the Environmental Compliance Approval.			

Question ID	948300	Question Type	Legislative
Question: Do operators and maintenance personnel have ready access to operations and maintenance manuals?			
Legislative Requirement	OWRA O. Reg. 129/04 20 (1);		
Observation			
Operators and maintenance personnel had ready access to operations and maintenance manuals.			

Question ID	948400	Question Type	Legislative
Question: Do the operations and maintenance manuals contain up-to-date plans, drawings and process descriptions sufficient for the safe and efficient operation of the sewage works?			
Legislative Requirement	OWRA O. Reg. 129/04 20 (2);		
Observation			
The operations and maintenance manuals contained up-to-date plans, drawings and process descriptions sufficient for the safe and efficient operation of the system.			

Question ID	948575	Question Type	BMP
Question: For Lagoon Systems, is the owner in conformance with the freeboard and berm conditions in the MOE Design Guidelines for Sewage Works?			
Legislative Requirement	Not Applicable		

Observation
The owner is in conformance with the freeboard and berm conditions in the MECP Design Guidelines for Sewage Works. Holding ponds appear to have 4:1 (horizontal:vertical) slope on inside of pond and 3:1 for outside of pond walls as per MOE Design Document and top of berms are wide enough for a truck to drive on. Depth of ponds should be no deeper than 3 to 4 m or 10 to 13 feet.

Question ID	948600	Question Type	BMP
Question: Is spill containment provided for the process chemicals and/or standby power generator fuel?			
Legislative Requirement	Not Applicable		
Observation			
Spill containment was provided for the process chemicals and/or standby power generator fuel.			

Question ID	948700	Question Type	Information
Question: Has the owner provided security measures for the facility?			
Legislative Requirement	Not Applicable		
Observation			
The owner had provided security measures for the facility.			

Question ID	948870	Question Type	Legislative
Question: Are source protection requirements prescribed by the Environmental Compliance Approval being met?			
Legislative Requirement	OWRA 53 (1);		
Observation			
All source protection requirements prescribed by the Environmental Compliance Approval were met.			

Question ID	942001	Question Type	Legislative
Question: Do the sewage works effluent sample results show compliance with BOD5 or CBOD5 limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The sewage works effluent sample results demonstrated compliance with BOD5 or CBOD5 limits prescribed by the Environmental Compliance Approval.			

Question ID	942200	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with total phosphorus limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The sewage works effluent sample results did not demonstrate compliance with total phosphorous limits prescribed by the Environmental Compliance Approval. In February and March 2021 - TP was exceeded where the limit was 0.25 mg/L for the monthly average. In February and March, 2021, the TP loading limit of 0.47 kg/d was exceeded. During the upgrade construction, a new chemical addition tank was installed outside the WPCP, this tank did not have sufficient insulation for the winter months. The tank was later replaced.			

Question ID	942400	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with total ammonia/total ammonia nitrogen/ionized ammonia limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The sewage works effluent sample results did not demonstrate compliance with total ammonia/total ammonia nitrogen/ionized ammonia limits prescribed by the Environmental Compliance Approval. In March, April, May, September, November and December 2019 the monthly TAN limit of 2.3 mg/L was exceeded. In January, February, March and April 2020 the TAN limit of 2.3 mg/L was exceeded. The monthly TAN limit increased to 3.5 mg/L for the above months after completion of Phase I, after December			

2020. The 2020 annual average limit of 1.5 mg/L for TAN was exceeded. There were issues with discharges from a commercial business for several years that caused high concentrations of total ammonia nitrogen during this inspection period. These discharges are now monitored bi-weekly by the Township and the operators.

Question ID	942500	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with microbiological parameter limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The sewage works effluent sample results did not demonstrate compliance with microbiological parameter limits prescribed by the Environmental Compliance Approval. In December 2019, February and March 2020 the monthly geometric mean density limit of 200 CFU/100mL was exceeded.			

Question ID	942550	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with the pH limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The sewage works effluent sample results demonstrated compliance with pH limits prescribed by the Environmental Compliance Approval.			

Question ID	942100	Question Type	Legislative
Question: Do sewage works effluent sample results show compliance with total suspended solids limits prescribed by the Environmental Compliance Approval?			
Legislative Requirement	OWRA 53 (1);		
Observation			
The sewage works effluent sample results did not demonstrate compliance with total suspended solids limits prescribed by the Environmental Compliance Approval. In April 2020, the TSS monthly average concentration was exceeded where the limit was 15 mg/L.			

In March and April, 2021 the loading limit of 18.6 kg/d was exceeded. These exceedances occurred during drawdown of the holding ponds.