



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Notice of Violation  
Putnam County  
Columbus Grove  
NPDES Permit

March 18, 2011

Mr. Jeff Vance  
Columbus Grove WWTP  
113 East Sycamore Street  
Columbus Grove, Ohio 45830

Dear Mr. Vance:

On March 3, 2011, an inspection was conducted at the Village of Columbus Grove's Wastewater Treatment Plant. Mr. Bob Huff was present and provided operation and maintenance information on the plant. The final effluent observed leaving the chlorine contact tank was turbid with no noticeable odor.

A review of the Discharge Monitoring Reports (DMR) for September 2010 to February 2011 shows that there have been several permit limit violations. The specific instances of noncompliance are enclosed on a separate sheet. Further review of your self-monitoring reports for the previous six months, ending January 2011, indicates that you are in significant non-compliance (SNC) with several effluent limits contained in your NPDES permit. The specific instance of SNC is enclosed on a separate sheet.

Please inform this office in writing as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

It was noted during the inspection that the facility is not performing composite sampling as required in the NPDES permit 001 table. The parameters that require composite sampling should be sampled according to the following procedure:

**Composite samples shall be comprised of at least three grab samples proportionate in volume to the sewage flow rate at the time of sampling and collected at intervals of at least 30 minutes, but not more than 2 hours, during the period that the plant is staffed on each day for sampling. Such samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's overall performance.**

Mr. Jeff Vance  
March 18, 2011  
Page Two

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in your Part III-General conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

The completed inspection report is enclosed. If you have any questions, please contact me at (419) 373-3053.

Sincerely,



Ryan Gierhart  
Division of Surface Water

/cs

Enclosures

pc w/encl: Mayor and Council  
Bob Huff, Columbus Grove WWTP  
NWDO\DSW\File

Get New  
Data

Get Detail  
for Selected  
Permit

### Facilities in Significant Non-Compliance \*\*

Period: Aug-10 Jan-11

| County | Permit # | Facility Name       | Major | Station Code | Param. Code | Parameter Name          | Max. % Exceed | # Months Signif. Exceed (1) | # Months Exceed (2) |
|--------|----------|---------------------|-------|--------------|-------------|-------------------------|---------------|-----------------------------|---------------------|
| Putnam | 2PC00004 | Columbus Grove WWTP |       | 1            | 00610       | Nitrogen, Ammonia (NH3) | 1166.4        | 3                           | 3                   |
| Putnam | 2PC00004 | Columbus Grove WWTP |       | 1            | 31616       | Fecal Coliform          | 9900          | 2                           | 2                   |

Get New Data

| Permit No.  | Reporting Period | Station | Reporting Code | Parameter              | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|---------|----------------|------------------------|------------|-------|----------------|----------------|
| 2PC00004*HD | September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3 | 30D Conc   | 2     | 25.3275        | 9/1/2010       |
| 2PC00004*HD | September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 25.4           | 9/1/2010       |
| 2PC00004*HD | September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 24.55          | 9/8/2010       |
| 2PC00004*HD | September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 34.            | 9/15/2010      |
| 2PC00004*HD | September 2010   | 001     | 31616          | Fecal Coliform         | 7D Conc    | 2000  | 4472.13        | 9/15/2010      |
| 2PC00004*HD | September 2010   | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 17.36          | 9/22/2010      |
| 2PC00004*HD | October 2010     | 001     | 00610          | Nitrogen, Ammonia (NH3 | 30D Conc   | 2     | 18.25          | 10/1/2010      |
| 2PC00004*HD | October 2010     | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 11.9           | 10/1/2010      |
| 2PC00004*HD | October 2010     | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 17.            | 10/8/2010      |
| 2PC00004*HD | October 2010     | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 22.45          | 10/15/2010     |
| 2PC00004*HD | October 2010     | 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 3     | 21.65          | 10/22/2010     |

State of Ohio Environmental Protection Agency  
Southwest District Office

**NPDES Compliance Inspection Report**

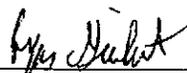
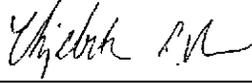
| Section A: National Data System Coding |           |                |                 |           |               |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit #                               | NPDES#    | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 2PC00004*ID                            | OH0020281 | 3/3/2011       | C               | S         | 1             |

| Section B: Facility Data  |  |                        |
|---|--|------------------------|
| Name and Location of Facility Inspected   | Entry Time   | Permit Effective Date  |
| Village of Columbus Grove WWTP<br>1371 N. Defiance Street<br>Ottawa OH 45875              | 9:00 a.m.  | 8/1/2008               |
|   | Exit Time  | Permit Expiration Date |
|   | 10:30 a.m.   | 7/31/2013              |
| Name(s) and Title(s) of On-Site Representatives   | Phone Number(s)                                      |                        |
| Bobb Huff, Operator<br>Jeff Vance, Village Administrator                                  | 419-659-5740<br>419-233-3825(Cell)<br>(419) 659-2982 |                        |
| Name, Address and Title of Responsible Official   | Phone Number   |                        |
| Jeff Vance, Village Administrator<br>113 E. Sycamore Street<br>Columbus Grove, Ohio 45830 | (419) 659-2982                                       |                        |

| Section C: Areas Evaluated During Inspection                            |                          |   |                           |   |                         |
|---|--------------------------|---|---------------------------|---|-------------------------|
| (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated) |                          |   |                           |   |                         |
| S   | Permit                   | S | Flow Measurement          | S | Pretreatment            |
| S   | Records/Reports          | S | Laboratory                | S | Compliance Schedule     |
| S   | Operations & Maintenance | S | Effluent/Receiving Waters | S | Self-Monitoring Program |
| S   | Facility Site Review     | S | Sludge Storage/Disposal   | S | Other                   |
| S   | Collection System        |   |                           |   |                         |

**Section D: Summary of Findings (Attach additional sheets if necessary)**

High flows from heavy rains have caused combine sewer overflows and high flows into the plant. A primary clarifier was down due to a broken sludge arm. The secondary trickling filter distribution arms are not rotating due to a motor failure noted in the 9/22/2010 inspection.

| Inspector  |         | Reviewer  |         |
|--|---------|---|---------|
|                     | 3/17/11 |                         | 3/16/11 |
| Ryan Gierhart<br>Environmental Specialist II<br>Division of Surface Water<br>Northwest District Office | Date    | Elizabeth A. Wick, P.E.<br>Water Quality Engineer<br>Division of Surface Water<br>Northwest District Office | Date    |

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described  
in permit..... Y
- (f) Storm water discharges properly permitted..... N/A

Comments/Status:

[Empty box for comments]

**Section F: Compliance**

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... N
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES Permit Compliance Schedule
- (f) Permittee is in compliance with schedule..... N
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

The facility has not met the milestone dates for phase I of the CSO separation located in the NPDES permit, page 16, schedule of compliance item 1. C.

**Section G: Operation & Maintenance**

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed  ..... N
  - i. What does the back-up power source operate.....  
A portable generator is available for the Water plant. Unsure if the generator can be hooked up to the wastewater plant.
  - ii. How often is the generator tested under load.....  
2/ year

(b) Which components have an alarm system available for power or equipment failures.....

Influent pumps to clarifiers and power to plant.

- (c) All treatment units in service other than backup units..... N
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... N
- (e) Any major equipment breakdown since last inspection..... Y
- (f) Operation and maintenance manual provided and maintained..... N
- (g) Any plant bypasses since last inspection..... N/A
- (h) Any plant upsets since last inspection..... N

**Comments/Status:**

1 of 2 Primary clarifiers was taken off line because of broken sludge arm. Clarifier was going to be put back online for high flows to allow the plant to bring more wastewater in. It is recommend that a schedule for routine and preventative maintenance be developed.

**Section G: Operation & Maintenance** con't

**Record Keeping/Operator of Record:**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... Y
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)  

Hard bound book
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
  - I. Identification of treatment works..... N
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
  - iii. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
  - iv. Laboratory results (unless documented on bench sheets)... N/A
  - v. Identification of person making entries..... Y
- (k) 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..... N

Comments/Status:

Written notification should be sent for effluent limit violations.

**Section G: Operation & Maintenance con't**

**Collection System:**

- (a) Are there pump stations in the collection system..... Y
  - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....0
  - ii. How many pump stations have telemetered alarms.....0
  - iii. How many pump stations have operable alarms.....5
  
- (b) Any chronic collection system overflows since last inspection..... Y
- (c) Regulatory agency notified of all overflows..... Y
- (d) CSOs in the collection system....if so, what is the LCTP status..... Y  

Facility behind schedule with phase I of the separation.
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... Y
- (f) Portable pumps available for collection system maintenance..... N
- (g) RDII Program established and active..... N
- (h) Any WIB complaint received since last inspection..... Y
- (i) Is there a WIB response plan..... N
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

Comments/Status:

CSOs are monitored by visual observation.

**Section H: Sludge Management**

- (a) Method of Sludge Disposal...
  - Land Application
  - Haul to Another NPDES Permittee
  - Haul to a Mixed Solid Waste Landfill

\*if one of the selected methods is land application, complete applicable charts.

- (b) Has amount of sludge generated changed significantly since the last inspection..... Y
- (c) How much sludge storage is provided at the plant.....  

120 days
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y

- (e) Any complaints received in last year regarding sludge..... N/E
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A

**Comments/Status:**

Facility's anaerobic digester's boiler is broken. The facility is not planning to repair the boiler but is going to use the digester as a sludge holding tank and landfill the sludge placed on the drying beds.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
- (b) Flow meter calibrated annually ..... Y  
(Date of last calibration: 7/2010)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

**Comments/Status:**

**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... N  
(see GLC page)
- (d) 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)..... Y

**Comments/Status:**

The facility is not collecting composite samples using grab samples for all parameters. Composite samples are needed for the parameters indicated in the NPDES permit 001 table.

**Section I: Self-Monitoring Program (con't)**

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N
- (b) Do SOP's include the following if applicable:
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and Preservation
  - Interferences
  - Apparatus and Materials
  - Reagents
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y (see score from GLC page)
- (h) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: Metals, oils/grease, low level mercury

Lab name: Alloway

*Discharge Monitoring Report Quality Assurance (DMRQA)*

- (a) Participation in latest USEPA quality assurance performance sampling..... N  
Date:
- (b) Were any parameters "Unsatisfactory" ..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

**Comments/Status:**

Written Standard Operating Procedures (SOPs) need to be developed.

**Section J: Effluent/Receiving Water Observations**

**Outfall # 001**

Outfall Description: Effluent pipe discharge was not observed. Observed effluent leaving chlorine contact tank. Effluent was turbid with a lot of surface water coming into the plant.

Receiving Stream: Plum Creek

Receiving Stream Description: Stream at discharge was not observed due to flooding. Upstream of discharge the stream was turbid with very high flow.

**Comments/Status:**

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

Form Approved  
OMB No.

158-R0035

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

| CONDITION OR APPEARANCE                            |                                   | RATING | COMMENTS  |
|--|-----------------------------------|--------|---|
| General  | Grounds                           | S      |   |
|  | Buildings                         | S      |   |
|  | Potable Water Supply Protection   | S      |   |
|  | Safety Features                   | S      |   |
|  | Bypasses                          |        |   |
|  | Stormwater Overflows              |        |   |
|  | Alternate Power Source            | U      | No alternate Power source at the facility                 |
|  |                                   |        |   |
| Preliminary  | Maintenance of Collection Systems |        |   |
|  | Pump Station                      |        |   |
|  | Ventilation                       |        |   |
|  | Bar Screen                        | IN     | 1 in  |
|  | Disposal of Screenings            | S      | To land fill  |
|  | Comminutor                        |        |   |
|  | Grit Chamber                      | IN     |   |
|  | Disposal of Grit                  | S      | To dumpster to landfill                                   |
|  |                                   |        |   |
| Primary  | Settling Tanks                    | IN     | 1 of 2  |
|  | Scum Removal                      | IN     |   |
|  | Sludge Removal                    | IN     | 1-Sludge Return Pump 1 Sludge Waste Pump                  |
|  | Effluent                          | M      | Turbid  |
|  |                                   |        |   |
| Sludge Disposal                                    | Digesters                         | IN     | 1 anaerobic digester converted to sludge holding tank     |
|  | Temperature and pH                |        |   |
|  | Gas Production                    |        |   |
|  | Heating Equipment                 |        |   |
|  | Sludge Pumps                      |        |   |
|  | Drying Beds                       | IN     | 2 beds in 1 bed used for storage 1 bed used for drying    |
|  | Filter Press                      |        |   |
|  | Disposal of Sludge                | S      | Landfill  |
| Other  | Flow Meter and Recorder           | In     | Ultrasonic weir   |
|  | Records                           |        |   |
|  | Lab Controls                      |        |   |
|  | Chemical Treatment                |        |   |
|  |                                   |        |   |
| Secondary-Tertiary<br><small>List items as</small> | Trickling Filters                 | IN     | Secondary filter IN/arms not rotating,, Primary Filter IN |
|  |                                   |        |   |
|  | Final Clarifier                   | IN     | Turbid  |
| Disinfection                                       | Effluent                          | M      | Turbid  |
|  | Disinfection System               | OUT    |   |
|  | Effective Dosage                  |        |   |
|  | Contact Time                      |        |   |
|  | Contact Tank                      |        |   |
|  | Dechlorination                    |        |   |