



State of Ohio Environmental Protection Agency

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OHIO E.P.A.  
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September 27, 2007

Putnam County  
2PB00029\*GD

Mayor and Council  
Village of Pandora  
P.O. Box 193  
Pandora, OH 45877

Re: Notice of Violation – Nine Minimum Control Implementation/ Collection System Inspection

Dear Mayor and Council:

On September 12, 2007, I met with Superintendent Marvin Steiner and Wastewater Treatment Plant Operator Rick Morrison to conduct an inspection of the Village of Pandora's wastewater collection system and the degree of implementation of the Nine Minimum Controls (NMC) for reducing combined sewer overflow impacts. The Nine Minimum Controls are included in Part II, Item F of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 2PB00029\*GD).

Discussion during the inspection, review of records, and review of information submitted to this office indicates that the Village is in violation of permit requirements calling for implementation of the Nine Minimum Controls. Specifically, the Village is not sufficiently implementing the following minimum controls: Proper operation and regular maintenance programs for the sewer system and Combined Sewer Overflow (CSO) outfalls (NMC 1), Public notification (NMC 8), and Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls (NMC 9). Details regarding the Village's efforts for each of the Nine Minimum Controls and additional efforts that should be implemented are discussed below and in Attachment A.

The current status of Long-Term Control Plan project implementation was also discussed during the inspection. The Village is currently working toward complete separation of the collection system by installing new sanitary lines. Completion of the separation projects is required by December 31, 2010, and is to result in complete separation of the collection system and elimination of all overflows from the collection system. The permittee indicated that they are on schedule with the separation work.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

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Our comments and recommendations are as follows:

- 1) The Village should develop a Collection System Operation and Maintenance Plan, and implement a proper operation and regular maintenance program for the collection system.

At a minimum, the contents of the program should include:

- Documentation of organizations and individuals responsible for aspects of the Operation and Maintenance (O&M) program,
  - A list of resources (*i.e.*, people and money) allocated to O&M activities,
  - Planning and budgeting procedures for O&M of the collection system,
  - A list of critical facilities (*e.g.*, backflow prevention devices, overflow weirs, CSO treatment facilities, pump stations, grease interceptors, *etc.*),
  - Written procedures and schedules for routine maintenance of equipment, sewers, pump stations, and catch basins,
  - Written procedures to ensure that regular maintenance is provided,
  - Written procedures for responding to emergency situations,
  - Establishment of a centralized, written log of maintenance and repair activities,
  - Policies and procedures for training O&M personnel, and
  - A process for periodic reviews and adjustments of the O&M program
- 2) The permittee should install signs at all CSO outfalls. These signs should be visible from any direction of approach (often two-sided signs are necessary) and located directly next to the associated outfall. An example sign has been included below (please note that contact information must be provided on these signs). It is also recommended that the permittee periodically distribute (during recreational season, when new projects are being implemented, *etc.*) informational brochures detailing CSO information (such as location, health concerns, and contact information to receive further details).
  - 3) CSO outfalls should be monitored in accordance with Part II, Item E of the Village's NPDES permit (2PB00029\*GD). As stated in the permit, the permittee shall set up a rotating schedule to sample at least five (5) stations during each storm event. Samples should be collected during the first 30 minutes of discharge. Data for the number of occurrence(s) per day, the daily duration, and the total daily flow may be estimated. Monitoring data shall be submitted for each month when discharge occurs. When discharge occurs, the monthly monitoring report shall be attached to the normal monthly report form (EPA-4500).

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**Attachment A**  
**Village of Pandora Combined Sewer Overflow Reconnaissance Inspection**

Part II, Other Requirements, Item F., in the permittee's NPDES permit (Ohio EPA No. 2PB00029), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls. Part II.B. of the National CSO Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

1. Proper operation and regular maintenance programs for the sewer system and CSOs.

Village of Pandora staff operates and maintains the WWTP and collection system. The permittee inspects the seven CSO outfalls on a monthly basis and during wet weather. CSO inspections are documented. The permittee maintains an up-to-date sewer collection system map for use in planning and inspections.

**The permittee should develop and implement a proper operation and regular, preventative maintenance program for the collection system. The body of this letter contains minimum program characteristics that should be included (see comment 1).**

2. Maximum use of the collection system for storage.

The permittee indicated that overflow pipes connect to the interceptors at the highest elevations allowable without negatively impacting users.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.

There are two industrial users in the Village of Pandora. The waste streams from these facilities originate from the restrooms.

4. Maximize flow at the WWTP for treatment.

Village staff indicated that the average daily design flow for the WWTP (a stabilization pond followed by a rock filter) is approximately 0.4 million gallons per day (MGD). Peak treatment capacity of the plant is estimated at approximately 0.55 MGD. Village staff operates the treatment facility at peak levels during wet weather.

5. Prohibition of CSOs during dry weather.

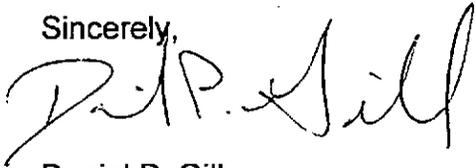
Village staff indicated that one of the CSOs is subject to dry weather overflows due to

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Please note that proper implementation of the Nine Minimum Controls is critical to your achieving compliance with your NPDES permit. Failure to comply with the Nine Minimum Control implementation requirements in your NPDES permit may result in enforcement actions from Ohio EPA.

Please provide a written response to this letter by October 31, 2007. If you have questions/concerns regarding this report, I can be reached by telephone at (614) 644-2118 or email at [dan.gill@epa.state.oh.us](mailto:dan.gill@epa.state.oh.us).

Sincerely,

A handwritten signature in black ink, appearing to read "D.P. Gill". The signature is written in a cursive style with a large, sweeping initial "D".

Daniel P. Gill  
Environmental Specialist  
Division of Surface Water, Ohio EPA  
Central Office

Attachments

cc: Dana Martin-Hayden, DSW, NWDO  
DSW-CO File

an improperly working flapgate. The completion of the current phase of sewer separation, which is expected by the end of 2007, should allow for elimination of this CSO.

6. Control of Solid and Floatable Materials in CSOs.

The permittee cleans catch basins on an annual basis and in response to complaints. The collection sewer lines are cleaned on an as needed basis.

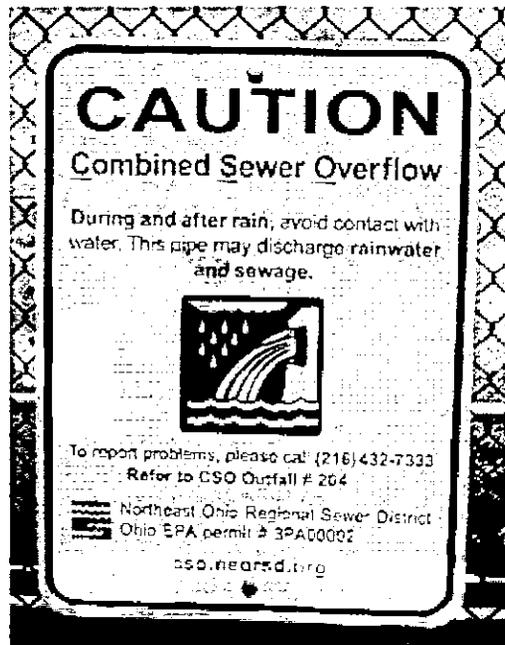
7. Pollution prevention.

The Village hires a street cleaning operation three times per year. The Village also operates a leaf and brush removal program.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.

The permittee does not engage in any public notification measures. **The body of this letter contains minimum program characteristics that should be implemented (see comment 2).**

Example CSO sign for public notification:



9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

The permittee does not engage in any monitoring of their CSOs. **The body of this letter contains minimum program characteristics that should be implemented (see comment 3).**