



State of Ohio Environmental Protection Agency

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May 17, 2010

Putnam County
2PB00029*GD

Mayor and Council
Village of Pandora
PO Box 193
Pandora, OH 45877

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

Dear Mayor and Council:

On April 20, 2010, Ohio EPA staff members Ryan Gierhart and I met with Village Administrator Stanley Schneck and Wastewater Superintendent Marvin Steiner to conduct an inspection of the Village of Pandora's wastewater collection and treatment system. This letter focuses on the degree of implementation of the Nine Minimum Controls (NMC) for reducing Combined Sewer Overflows (CSOs) and the status of Long-Term Control Plan projects. The Nine Minimum Controls are included in Part II, Item F of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 2PB00040*ND). The Village's 2003 Consent Decree requires complete separation and CSO elimination by December 31, 2010.

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. While this office recognizes that Pandora has made considerable progress in addressing its CSOs, documentation of inspections, maintenance and repair work for the collection system, lift stations and CSOs continues to be neglected. Details regarding the Village's efforts and additional measures the Village should implement to achieve compliance are contained in Attachment A below.

The current status of the Village's Long-Term Control Plan projects was also discussed during the inspection: Village staff reported that all public sewers have been completely separated and efforts are now focused on connecting the remaining residential users to the new system.

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



Page 2
May 17, 2010

If you have questions/concerns regarding this letter, I can be reached by telephone at (614) 644-2118 or email at dan.gill@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink, appearing to read "D. P. Gill". The signature is fluid and cursive, with the first name "D." and last name "Gill" clearly distinguishable.

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

Attachments:

pc: Stanley Schneck, Pandora
DSW/CO – File

ec: Ryan Gierhart, DSW/NWDO

Attachment A

Village of Pandora Combined Sewer Overflow (CSO) Compliance 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 & regular maintenance programs for the sewer system and CSOs.

Village of Pandora staff operates and maintains the wastewater treatment plant (WWTP) and collection system. The collection system currently has three CSOs and one bypass at the WWTP – all of which are to be eliminated by the end of 2010.

The Village does not have a defined collection system operation and maintenance program. **To enhance and document the operation and maintenance efforts for the collection system, the Village should develop a structured O&M program and manual. The O&M program should be periodically (e.g., annually) reviewed by Village staff and updated accordingly. It is critical to keep this document updated in order to catalogue the knowledge of existing staff as it pertains to effective operation & maintenance and system layout. At a minimum, this program should include the following:**

- Documentation of organizations and individuals responsible for all 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 and their capacities (*e.g.*, overflow weirs, CSO treatment facilities, pump stations, interceptors, grease interceptors, *etc.*),
- Documentation of system layout and problem areas,
- Written procedures and schedules for routine maintenance of equipment, sewers, pump stations, catch basins, street sweeping, *etc.*,
- Written procedures to ensure that regular maintenance is provided,
- Written procedures and phone numbers for responding to emergency situations,
- Policies and procedures for training O&M personnel, and
- A process for periodic reviews and revisions of the O&M program

Also, records of inspections, maintenance and repair activities should be maintained in a centralized log keeping note of date, time, crew member performing work, items requiring attention and corrective measures taken.

2. Maximum use of the collection system for storage.

Pandora has eliminated all but three CSOs through sewer separation and is expecting

to eliminate these remaining overflows and the WWTP bypass by the end of 2010.

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

Village staff reported that all wastewater flows from industrial users are from toilet flushing and hand washing.

4. Maximize flow at the WWTP for treatment.

The Pandora WWTP is a continuous discharge treatment lagoon that is in the process of being converted into a controlled discharge facility. The current average design flow is 0.4 MGD, but the Village is evaluating re-rating the facility following conversion. WWTP improvements are expected to be complete by the end of July 2010.

5. Prohibition of CSOs during dry weather.

It was reported that separation work has resulted in the remaining CSOs becoming largely inactive. **Until such time that overflows are permanently closed, CSOs should still be visited on a weekly basis to ensure that dry weather overflows are not occurring.**

6. Control of Solid and Floatable Materials in CSOs.

Catch basins are cleaned on an annual basis. The Village contracts street sweeping activities with the Village of Columbus Grove. It was stated during the inspection that the collection system is cleaned on an as needed basis through contracts with Columbus Grove. **The Village should identify problem areas in the collection system that are prone to grit deposition or other flow restrictions and provide routine inspections/cleanings for these sewers.**

7. Pollution prevention.

The Village implements leaf pick-up and brush pick-up programs.

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

The Village includes articles relating to CSO activities in the local newspaper. Also, residents were notified of separation activities and requirements to separate their laterals through direct mailings.

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

It was reported that separation work has resulted in the remaining CSOs becoming largely inactive. **Until such time that overflows are permanently closed, CSOs should still be monitored in accordance with requirements contained in your NPDES permit (Ohio EPA No. 2PB00029).**