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September 11, 2007

Darke County
1PB00005*JD

Mayor and Council
Village of Ansonia
P.O. Box 607
Ansonia, OH 45303

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

Dear Mayor and Council:

On August 9, 2007, Ohio EPA staff members Joe Miller, Laura Pohlman and I met with Village Administrator Brian Wilcox to conduct an inspection of the Village of Ansonia'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 G of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 1PB00005*JD).

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), Maximizing use of the collection system for storage (NMC2), and Prohibition of dry weather overflows (NMC5). Details regarding the Village's efforts for each of the Nine Minimum Controls are contained 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 either new storm or new sanitary lines where appropriate. Completion of the separation projects is required by July 31, 2009, 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 were expecting to complete construction by summer of 2008.

Our comments and recommendations are as follows:

1) The Village should review and update the Collection system Operation and Maintenance Plan (received by Ohio EPA on 2/31/2002) as needed, 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,
   - Policies and procedures for training O&M personnel, and
   - A process for periodic reviews and adjustments of the O&M program

2) The Village should investigate the potential to raise the adjustable plates associated with the fixed-weir CSO regulators. These plates should be raised to the highest elevations allowable that will not increase the incidence of basement flooding. Raising these plates will help maximize use of the collection system for storage helping to reduce the amount of untreated sewage leaving the collection system through CSO outfalls.

3) At a minimum, the CSO outfalls should be inspected on a weekly basis (regardless of the occurrence of precipitation) and during wet weather. Dry weather overflows, which are not permitted, can occur for various reasons including pipe breaks/collapses and sewer blockages. Inspecting the CSOs during dry weather will determine if dry weather overflows are occurring, and allow the Village to implement corrective measures.

4) Ohio EPA staff members visited several of the CSOs on the day of the inspection (outfalls 1PB00005005, 1PB00005011, and 1PB00005012). It was observed that the CSO outfall pipe and manhole associated with the water treatment plant (CSO 012) was stained orange – possibly a result of filter backwashing. To alleviate environmental impacts from this CSO Village staff should investigate the potential to raise the fixed-weir regulator associated with this outfall, as well as, the ability to eliminate the CSO altogether.

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 September 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.

Sincerely,

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

Attachments

cc: Joe Miller, DSW, SWDO
DSW-CO File

Attachment A
Village of Ansonia Combined Sewer Overflow Reconnaissance Inspection

Part II, Other Requirements, Item G., in the permittee's NPDES permit (Ohio EPA No. 1PB00005), 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 Ansonia staff operates and maintains the WWTP and collection system. The permittee inspects the ten CSO outfalls during wet weather and in response to complaints. CSO inspections are documented. The permittee maintains a detailed and up-to-date sewer collection system map for use in planning and inspections. A centralized log book of maintenance and repair activities is maintained by the Village's Public Works Department.

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.
All of the CSOs have fixed-weir regulators with adjustable plates. **The body of this letter addresses measures that should be taken to properly implement this minimum control (see comment 2)**. None of the CSOs have backflow prevention devices (duckbills, flapgates, etc.) installed on them. It was stated that several of the CSOs are prone to river intrusion when the receiving water level is elevated. It was indicated by the permittee that during these events the receiving water flows into the collection system (as opposed to the untreated water flowing out to the receiving stream). This situation still raises several concerns: (1) additional inputs of water (*i.e.*, the receiving stream) into the collection system may cause other CSOs to activate elsewhere in the collection system that would otherwise not have activated, and (2) the WWTP may have to run at peak capacity for longer durations in order to treat the additional water inputs resulting in increased costs and wear on treatment facilities.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.
There are no significant industrial users in the Village of Ansonia.

4. Maximize flow at the WWTP for treatment.
Village staff indicated that the average daily design flow for the WWTP (a continuous

discharge aerated lagoon system) is approximately 0.36 million gallons per day (MGD). Peak treatment capacity of the plant is unknown; however, Village staff is able to treat greater than 1.2 MGD during wet weather without negatively impacting the treatment facility.

5. Prohibition of CSOs during dry weather.
Village staff indicated that they were unable to determine whether dry weather overflows have occurred as the CSOs are only inspected during rain events. **The body of this letter indicates measures that should be taken to ensure that dry weather overflows are not taking place (see comment 3).**

6. Control of Solid and Floatable Materials in CSOs.
The permittee cleans catch basins and collection sewer lines on an as needed basis. Approximately 60-70% of the catch basins are sumped-style (which are cleaned annually) with the remaining being replaced in association with ongoing street improvement projects. **During the inspection, sludge solids and trash were noted at several CSO outfalls. The Village should review and consider increasing the frequency of catch basin cleaning.**

7. Pollution prevention.
The Village operates street sweeping equipment on a weekly basis. The Village also operates a leaf removal program.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.
Signs are posted at CSO locations to inform the public that contact with discharges from these structures should be avoided. The Village also includes CSO-related information in their quarterly newsletter.

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.
The permittee is continuing to monitor its system in accordance with their NPDES permit requirements. This information should be used to evaluate the effectiveness of sewerage system improvements.