



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

April 9, 2010

RE: WAYNE COUNTY
VILLAGE OF APPLE CREEK
NPDES# 3PB00004

Mayor Ray Carter
Village of Apple Creek
PO Box 208
Apple Creek, OH 44606

Dear Mayor Carter:

On March 19, 2010, this writer met with you and Mr. Andy Catanzarite to review the operations and maintenance of the wastewater treatment plant and conduct an inspection of the north wastewater treatment plant for the Village of Apple Creek (Village). The intent of the inspection was to evaluate the compliance, operations and maintenance of the treatment system.

The wastewater treatment system consists of raw pumping, comminutor/wet well, pre aeration tanks, primary clarifiers, trickling filters, secondary clarifiers, tertiary rapid sand filters and ultra violet disinfection.

During the inspection, the condition of the rapid sand filters was discussed. As it was noted during the inspection, the Village has planned to repair and rehabilitate the filters. The work is to be completed in approximately one week with all units being taken out of service for that time period. The mud well and clear well will be taken down at the same time. Please be advised, this office cannot approve of any work on the treatment system that may inhibit the plant's ability to meet the final effluent limits of the NPDES permit. It is the Village's responsibility to meet the final effluent limits of the NPDES permit at all times.

The ultraviolet disinfection is located in the clearwell of the filters and will be taken out of service while the filters are repaired. Mr. Catanzarite indicated the Village is interested in initiating chlorination and dechlorination during the filter repair work. The NPDES permit requires the wastewater treatment to meet effluent limits for fecal coliform bacteria. As such, the Village can initiate chlorination and dechlorination during periods when the UV disinfection system is taken down.

A review of plant performance data from the discharge monitoring reports (DMR) showed significant non compliance between January 1, 2008 and March 1, 2010. The Village has been in non compliance 15 of the past 22 months and failed to report

Mayor Ray Carter
Village of Apple Creek
April 9, 2010
Page 2

samples and analysis required by the NPDES permit. A violation summary has been attached to this letter for your records. Please review the violation summary for accuracy and report any errors to Mr. Jamie Roberts of this Agency's Central Office at (614) 644-2054.

Please note, the Village must report non-compliance that is the result of any violation of a **daily maximum discharge limit** for any of the pollutants listed by the Director in your NPDES permit (see Part III, Section 12 of your NPDES permit for details). The required form is located at <http://www.epa.ohio.gov/dsw/permits/permits.aspx#noncompliance>. The form should be completed and e-mailed to this writer or the appropriate Ohio EPA inspector.

At the time of the inspection, the treatment plant was producing a satisfactory quality effluent. The trickling filters were in operation and appeared to be in good condition. The Village placed a barrier wall structure on one filter in an attempt to prevent drifting snow from inhibiting the function of the distribution arms. The rapid sand filters were in operation and appeared to be in need of some rehabilitation work. It was mentioned the filters backwash 2 to 4 times a day, depending on flow and the amount of grease balls in the media. It was indicated the filter underdrains may be clogged due to a lack of air getting through the media and an inadequate distribution of the air.

Currently, the Village is utilizing the 300,000 gpd north plant for primary wastewater treatment. The south plant is currently in disrepair and not functional on short notice. The wastewater is pumped from the south plant to the north plant via a forcemain.

It is understood the Village is working with a consulting engineer to design an upgrade to the wastewater treatment plant. During the inspection, it was indicated the Village may be interested in expanding the wastewater treatment plant capacity at the north plant. Under Section B.2.b of the Antidegradation Rule (Ohio Administrative Code 3745-1-05), an expansion within the previously authorized limit of the permit (discharge capacity of south plant) would not be subject to the rule. At the time of expansion, we would require verification that the stream could adequately assimilate the proposed discharge without causing a water quality violation.

The wastewater treatment plant is currently classified by the Ohio EPA as a Class III wastewater treatment facility. This classification is located in the NPDES permit which had an effective date of September 1, 2007. New operator and plant certification rules have gone in effect and are found in OAC 3745-7-04. The new regulations revise the plant classification rankings and would change the classification of the Apple Creek Wastewater Treatment Plant to a Class II facility. This new classification would be effective upon the NPDES permit renewal (current NPDES permit expires August 31,

Mayor Ray Carter
Village of Apple Creek
April 9, 2010
Page 3

2012). The Village has the opportunity to submit an NPDES permit modification to revise the plant classification earlier than the next permit renewal in 2012. To proceed with a permit modification, a modification application must be submitted to this office, along with the application fee of \$200. These documents can be found on our Web site at <http://www.epa.state.oh.us/dsw/permits/npdesform.html>.

Our records indicate the Village has approximately 10 industrial users that discharge wastewater to the treatment plant. An industrial user survey has not been completed by the Village so the data on any industries is limited. Please be aware, should the Village decide to accept additional industrial users to the system, we recommend you contact this office first. Due to the non compliance issues that exist at the wastewater treatment plant, we recommend the Village complete a thorough industrial user survey within the next 90 days.

To avoid possible referral for enforcement, the Village must respond in writing within 30 days and address the non compliance issues noted in this letter and propose corrective action. If you feel this timeframe is unacceptable, please notify this office in writing of your intentions no later than two weeks from receipt of this letter. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

Enclosure: Violation Summary
24 Hr. NPDES Non Compliance Notification Fact Sheet

pc: Wayne County Health Dept.
Mr. Andy Catanzarite, Apple Creek

File: Public/Apple Creek/PC

Discharge Violations:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	3.542	1/1/2008
January 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	5.56032	1/22/2008
January 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	9.215	1/22/2008
February 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	3.66875	2/1/2008
February 2008	001	Nitrogen, Ammonia (NH3	30D Qty	2.4	4.32275	2/1/2008
February 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	6.34406	2/1/2008
February 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.01	2/1/2008
February 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	5.835	2/8/2008
February 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	5.27048	2/8/2008
February 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	3.46751	2/15/2008
February 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.19	2/15/2008
March 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.21363	3/1/2008
March 2008	001	Nitrogen, Ammonia (NH3	30D Qty	2.4	3.67748	3/1/2008
March 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	4.19796	3/1/2008
March 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	5.68882	3/15/2008
April 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.38	4/1/2008
April 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.36	4/8/2008
December 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	3.7869	12/1/2008
December 2008	001	Nitrogen, Ammonia (NH3	30D Qty	2.4	2.58111	12/1/2008
December 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	5.73	12/8/2008
December 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	10.27	12/22/2008
December 2008	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	6.72984	12/22/2008
January 2009	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	6.93125	1/1/2009
January 2009	001	Nitrogen, Ammonia (NH3	30D Qty	2.4	3.2682	1/1/2009
January 2009	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	5.39	1/8/2009
January 2009	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	11.3	1/15/2009
January 2009	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	4.41861	1/15/2009
January 2009	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	4.33998	1/22/2009
January 2009	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	8.825	1/22/2009
February 2009	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.35375	2/1/2009
February 2009	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.185	2/22/2009
March 2009	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	4.565	3/1/2009
August 2009	001	Nitrogen, Ammonia (NH3	7D Conc	1.5	1.92	8/22/2009
January 2010	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.1945	1/1/2010
January 2010	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	4.77	1/8/2010
February 2010	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	7.99	2/1/2010
February 2010	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.685	2/1/2010
February 2010	001	Nitrogen, Ammonia (NH3	30D Qty	2.4	4.18335	2/1/2010
February 2010	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	4.635	2/8/2010
February 2010	001	Nitrogen, Ammonia (NH3	7D Qty	3.4	7.51341	2/15/2010
February 2010	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	15.65	2/15/2010
February 2008	001	Total Suspended Solids	7D Qty	20.4	36.5877	2/1/2008

Frequency Violations:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/01/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/05/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/06/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/12/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/13/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/19/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/20/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/26/2008
January 2008	001	00300	Dissolved Oxygen	1/Day	1	0	01/27/2008
June 2008	001	00719	Cyanide, Free	2/Year	1	0	06/01/2008
August 2008	801	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	08/01/2008
August 2008	801	31616	Fecal Coliform	1/Quarter	1	0	08/01/2008
August 2008	901	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	08/01/2008
August 2008	901	31616	Fecal Coliform	1/Quarter	1	0	08/01/2008
December 2008	001	01074	Nickel, Total Recovera	2/Year	1	0	12/01/2008
December 2008	001	01094	Zinc, Total Recoverabl	2/Year	1	0	12/01/2008
December 2008	001	01113	Cadmium, Total Recover	2/Year	1	0	12/01/2008
December 2008	001	01114	Lead, Total Recoverabl	2/Year	1	0	12/01/2008
December 2008	001	01118	Chromium, Total Recove	2/Year	1	0	12/01/2008
December 2008	001	01119	Copper, Total Recovers	2/Year	1	0	12/01/2008
December 2008	001	01220	Chromium, Dissolved He	2/Year	1	0	12/01/2008
December 2008	001	00719	Cyanide, Free	2/Year	1	0	12/01/2008
December 2008	001	50092	Mercury, Total (Low Le	2/Year	1	0	12/01/2008
December 2008	801	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	12/01/2008
December 2008	901	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	12/01/2008
June 2009	801	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	06/01/2009
June 2009	901	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	06/01/2009
November 2009	001	00400	pH	1/Day	1	0	11/27/2009
November 2009	001	00300	Dissolved Oxygen	1/Day	1	0	11/27/2009