OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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

November 5, 2008

RE: WAYNE COUNTY
VILLAGE OF CRESTON
3PB00012

Mr. Mark Allen, Supervisor
Village of Creston
179 Bunker Street
Creston, OH 44217

Dear Mr. Allen:

On October 30, 2008, this writer accompanied by Chris Moody of this office met with you to conduct an inspection of the sewage treatment plant and a sludge inspection for the Village of Creston. The intent of the inspection was to evaluate operations and maintenance of the system in response to a complaint received by this office from a nearby resident.

The complaint received by this office was for odors produced at the plant and from the land application of the sludge. In addition, the complaint also stated there is potential open dumping of construction and demolition debris (C&DD) waste at the wastewater treatment plant, frequent sanitary sewer overflows occurred on private residences in the collection system, and sewer rehabilitation projects that need to be finished.

Our inspection of the wastewater treatment facility and the above noted complaint revealed the following:

1) It is our understanding the two aerobic digesters are operated anaerobically with oxygen supply cycled anywhere from 15 minutes a day to three days out of the month. When the oxygen supply to the digesters was turned up, a strong sewage odor was detectable. In addition, the digesters appeared to have overflowed recently. Because the odors present at the plant appeared to be originating from the condition of the aerobic digesters, we recommend you supply oxygen as the system was originally designed. If you prefer, you may rehabilitate the digesters as anaerobic digesters which would require a permit-to-install application.

   The condition of the wastewater system is in violation of Part II, Item E of your National Pollutant Discharge Elimination System (NPDES) Permit for failure to maintain in good working order and operate as efficiently as possible the treatment works and sewerage system as defined in Ohio Revised Code (ORC) 6111.01 to achieve compliance with the terms and conditions of this permit and to prevent discharges to waters of the state, surface of the ground, basements, homes, buildings, etc.

2) Sludge is being land applied on the property located in front of the wastewater treatment plant, south of Burbank Road, East of Gearhart Road. It is our understanding that clean fill has been added to the site as well. You indicated the clean fill was added prior to the application of the sludge. You also indicated the Village of Creston obtained a permit from the Wayne County Health Department to dump clean fill on this property and land apply sludge over the top of the clean fill with the intention of stabilizing with seeding/mulch. You stated the Wayne County Health Department had been out to inspect the clean fill operation numerous times and had not had an issue with the materials being dumped.

   We have some concerns whether some of the materials being disposed of are considered C&DD materials. It has been brought to this office's knowledge that the debris from the burned down Golden Veal slaughter house was disposed of at this site. It is our interpretation that this material would be considered C&DD waste and would not be allowed to be disposed of at a clean fill site. If this waste was in fact disposed of at this site, we need to know the exact material disposed of, when it was disposed of and how much material was disposed. It should also be mentioned that this entire site is located in what appears to be a wetland. If C&DD waste disposal is confirmed at this site, this will pose a significant risk to the groundwater and surface water. In addition, the land application of sludge in a wetland area is prohibited.

3) During our inspection of a sanitary sewer overflow (SSO) complaint on Mr. Lee Kinder's property, we found evidence that sanitary sewer manhole overflows had occurred. It is our understanding the sewer rehabilitation project that took place on Mr. Kinder's property replaced a smaller diameter pipe with a larger diameter sewer but failed to increase the size of the sewer carrying the sewage from the manhole to the wastewater treatment plant. This has created a bottleneck situation on Mr. Kinder's property and has forced the manhole on his property to overflow on occasion. The manholes located on Mr. Kinder's property are also causing an odor problem which was noted during our inspection.

4) The overflows which have occurred in the collection system have not been reported to Ohio EPA, as is required per your NPDES permit Part II, Item D. As such you are ordered to meet the requirements set forth as follows:

   a) As soon as possible, but not later than December 31, 2008, you must submit an Annual Report to this office summarizing all SSO's in your collection system, including those that do not enter waters of the state.
   b) The time period for collecting the data to be included in this report should be from the effective date of your current NPDES permit cycle (February 1, 2006).

c) The Annual Report must be in an acceptable format (see Part II, Item D, 2(b) for guidelines).
d) You must also provide adequate notice to the public of the availability of the report.

5) The plant inspection revealed the mixed liquor in the aeration tank to be a chocolate brown color. The clarifier had some foam buildup on the intake weir that was somewhat excessive and you indicated it was due to a recent power outage. The clarifiers were recently rehabilitated with the elevations leveled out so the flow is evenly distributed between the two units. The mixed media rapid sand filters were in operation and appeared to be in good condition. The final effluent appeared to be in good condition with no visible solids present in the outfall.

6) A list of the wastewater treatment plant discharge violations for the period of February 2006 through September 2008 has been attached to this letter. A copy of this violation summary was provided to you during the inspection. Please review this summary and provide our office with a response regarding the causes for the noncompliance as soon as possible but no later than December 31, 2008.

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

cc: Ken Eng, Wayne County Health Dept.

ec: Rich Blasick, P.E., Ohio EPA, DSW, NEDO
Chris Moody, Ohio EPA, DSW, NEDO

File: Public/Wayne/Village of Creston

Violation Summary

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2006	001	CBOD 5 day	7D Qty	17.0	23.5894	6/22/2006
February 2008	001	CBOD 5 day	7D Qty	17.0	23.5252	2/1/2008
March 2008	001	CBOD 5 day	30D Qty	11.4	11.7401	3/1/2008
August 2008	001	CBOD 5 day	7D Conc	15	106.025	8/1/2008
August 2008	001	CBOD 5 day	7D Qty	17.0	102.657	8/1/2008
August 2008	001	CBOD 5 day	30D Qty	11.4	27.4176	8/1/2008
August 2008	001	CBOD 5 day	30DConc	10	28.3625	8/1/2008
May 2007	001	Dissolved Oxygen	1D Conc	5.0	3.4	5/9/2007
September2007	001	Dissolved Oxygen	1D Conc	5.0	4.	9/14/2007
April 2008	001	Dissolved Oxygen	1D Conc	5.0	2.6	4/7/2008
May 2006	001	Nitrogen, Ammonia (NH3	30D Qty	1.7	2.02997	5/1/2006
May 2006	001	Nitrogen, Ammonia (NH3	7D Qty	2.6	4.14634	5/15/2006
May 2007	001	Nitrogen, Ammonia (NH3	7D Conc	2.3	4.4	5/1/2007
July 2007	001	Nitrogen, Ammonia (NH3	7D Conc	2.3	2.465	7/8/2007
August 2007	001	Nitrogen, Ammonia (NH3	7D Conc	2.3	3.00533	8/1/2007
August 2007	001	Nitrogen, Ammonia (NH3	7D Qty	2.6	19.4986	8/1/2007
August 2007	001	Nitrogen, Ammonia (NH3	30D Qty	1.7	9.18639	8/1/2007
August 2007	001	Nitrogen, Ammonia (NH3	30DConc	1.5	4.286	8/1/2007
August 2007	001	Nitrogen, Ammonia (NH3	7D Conc	2.3	6.3575	8/8/2007
August 2007	001	Nitrogen, Ammonia (NH3	7D Qty	2.6	9.79074	8/8/2007
August 2007	001	Nitrogen, Ammonia (NH3	7D Conc	2.3	4.35	8/15/2007
March 2008	001	Nitrogen, Ammonia (NH3	7D Qty	14.7	16.3417	3/22/2008
April 2008	001	Nitrogen, Ammonia (NH3	30D Qty	9.9	10.0056	4/1/2008
April 2008	001	Nitrogen, Ammonia (NH3	7D Qty	14.7	16.3143	4/15/2008
July 2008	001	Nitrogen, Ammonia (NH3	30DConc	1.5	1.635	7/1/2008
July 2008	001	Nitrogen, Ammonia (NH3	30D Qty	1.7	2.3371	7/1/2008
July 2008	001	Nitrogen, Ammonia (NH3	7D Qty	2.6	3.99343	7/8/2008
June 2006	001	Total Suspended Solids	30D Qty	13.6	33.2815	6/1/2006
June 2006	001	Total Suspended Solids	7D Qty	20.4	75.2049	6/22/2006
December 2006	001	Total Suspended Solids	30D Qty	13.6	13.8748	12/1/2006
December 2006	001	Total Suspended Solids	7D Qty	20.4	36.6009	12/22/2006
December 2006	001	Total Suspended Solids	7D Conc	18	27.5	12/22/2006
June 2007	001	Total Suspended Solids	30DConc	12	12.5555	6/1/2007
June 2007	001	Total Suspended Solids	7D Conc	18	20.5	6/8/2007
August 2007	001	Total Suspended Solids	30DConc	12	16.2307	8/1/2007
August 2007	001	Total Suspended Solids	7D Conc	18	45.3333	8/15/2007
December 2007	001	Total Suspended Solids	7D Qty	20.4	22.0419	12/8/2007
February 2008	001	Total Suspended Solids	7D Conc	18	18.5	2/1/2008
February 2008	001	Total Suspended Solids	30D Qty	13.6	20.1962	2/1/2008
February 2008	001	Total Suspended Solids	7D Qty	20.4	63.0278	2/1/2008
March 2008	001	Total Suspended Solids	7D Qty	20.4	34.1350	3/1/2008
March 2008	001	Total Suspended Solids	30D Qty	13.6	17.2903	3/1/2008
April 2008	001	Total Suspended Solids	7D Conc	18	18.5	4/15/2008