



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

June 27, 2008

RE: WAYNE COUNTY
VILLAGE OF DOYLESTOWN
NPDES# 3Pb00014

Mayor Terry Lindeman
Village of Doylestown
24 South Portage Street
Doylestown, OH 44230

Dear Mayor Lindeman:

On June 10, 2008, this writer, accompanied by Chris Moody of this office, met with Mr. Denny White to conduct an inspection of the sewage treatment plant for the Village of Doylestown (Village). The intent of the inspection was to evaluate operations and maintenance of the treatment system prior to drafting the next NPDES permit.

The wastewater treatment system consists of a raw influent flume, muffin monster comminutor, bar screening, two flow equalization tanks, primary clarifier/digester unit, aerated digester, trickling filter, contact aeration tank, upflow clarifier, RBC units, chlorination/dechlorination and lagoon. Our inspection of the wastewater treatment plant revealed the following:

- 1) At the time of the inspection, the treatment plant was producing what appeared to be a satisfactory quality effluent. Overall, the plant appeared to be in good operation. The weirs of the clarifier/digester unit had solids accumulation and some slime was noticed on the surface of the clarifier.
- 2) The wastewater treatment plant was using gas chlorine for disinfection. A permit-to-install (PTI) for a liquid feed disinfection system was recently approved by our office. The construction and addition of this disinfection and upgraded dechlorination unit is expected to begin soon.
- 3) During the inspection, the phosphorus effluent limit was discussed with Mr. White. Phosphorus limits will be added to the upcoming renewal NPDES permit. The phosphorus limits will be a monthly average of 1.0 mg/L and a weekly average of 1.5 mg/L. Mr. White indicated the wastewater treatment plant may not be able to meet these effluent limits. As such, the renewed permit will include a compliance schedule to upgrade the wastewater treatment plant so it is in compliance with the phosphorus effluent limits. The compliance schedule will give the Village approximately 18 months to complete the upgrade. An interim table will be provided that will include phosphorus monitoring with no limits.

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- 4) A wasteload allocation and environmental assessment were performed by this office in preparation for the drafting of the renewal NPDES permit for your facility. The wasteload allocation and environmental assessment have suggested effluent limits for zinc and mercury be included in the NPDES renewal permit. The zinc and mercury limits were obtained by the reasonable potential calculations completed by this office. These limits are appropriate for maintaining and restoring the designated uses of the stream. The limits that will be added are:

	Average	Maximum
Zinc, TR	-	258 ug/L
Mercury	.012ug/L	1.7 ug/L

It is believed your treatment plant may not be able to meet the mercury limit. As such, your facility may need a mercury variance pursuant to the procedures described below.

A mercury variance is offered if the permittee determines it is eligible and submits an application for coverage under the mercury variance. Section D(10)(a) of rule 3745-33-07 includes information on eligibility for coverage and lists the information that must be included in the application. We encourage the Village to obtain the services of an engineer to complete the application. Two copies of the variance request report must be submitted to Northeast District Office. At the same time you submit the variance request report, you must also submit an NPDES modification request along with the \$200 application fee and a completed Anti Degradation Form.

Once this office determines the Village qualifies for the variance, public notification pursuant to the antidegradation review will be initiated. Dependent upon public comment, it is anticipated that the renewal NPDES permit will be modified to include a mercury limit in accordance with the variance.

This office will include a compliance schedule to submit a mercury variance application and permit modification application.

- 5) A summary of the wastewater treatment plant discharge violations for the period of January 2006 through May 2008 has been attached to this letter. During the inspection, Mr. White reviewed these violations and it was indicated some of the violations were in error. Mr. White has contacted our Central Office staff regarding these incorrectly reported values. Any reporting errors or eDMR errors must be reported to this office so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

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- 6) While reviewing data submitted by the Village, our office noticed some data inconsistencies which we would like to bring to your attention. It was revealed that numerous data points were incorrect and may be due to a reporting or lab error. We urge the Village to review all data reported for the last two years. Please check for inconsistencies between data present on your bench sheet and the information located in the Ohio EPA database. For metals, ensure all values are reported in correct units (ug/L versus ng/L) on the DMR and report with code "AA" only if the value is below detection.

If any inconsistencies are noticed, please contact this office as soon as possible. As a reminder, all data reported on your DMR must be checked for accuracy with your bench sheets. Self monitoring is used by our office to generate waste load allocations which dictate what or if any limits for certain parameters are required. Reporting errors affect the accuracy of our calculations and can result in more work for the Village in regards to permit limit determinations

The renewal NPDES permit for this facility is being drafted and will be public noticed in the near future. You will have 30 days from the date of the public notice to submit comments to Ohio EPA regarding the draft permit. 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: Wayne County Health Dept.

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

File: Public/Doylestown/PC

Effluent Limit Violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2007	001	00610	Nitrogen, Ammonia (NH3	30D Conc	6.0	6.07143	2/1/2007
June 2007	001	80082	CBOD 5 day	7D Conc	23	33.1	6/15/2007
August 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	2.3	2.62333	8/1/2007
October 2007	001	00530	Total Suspended Solids	7D Qty	56.7	92.1950	10/8/2007
October 2007	001	31616	Fecal Coliform	7D Conc	2000	3741.65	10/22/2007
October 2007	001	00610	Nitrogen, Ammonia (NH3	7D Conc	2.3	2.645	10/22/2007
October 2007	001	00610	Nitrogen, Ammonia (NH3	7D Qty	4.2	4.82461	10/22/2007
February 2008	001	80082	CBOD 5 day	7D Qty	75.7	99.6883	2/1/2008
February 2008	001	00610	Nitrogen, Ammonia (NH3	7D Qty	17.0	19.3855	2/1/2008
February 2008	001	00530	Total Suspended Solids	7D Qty	56.7	65.0584	2/1/2008

Frequency/Reporting Violations:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2006	001	00550	Oil and Grease, Total	1/Month	1	0	01/01/2006
February 2006	001	00550	Oil and Grease, Total	1/Month	1	0	02/01/2006
February 2006	001	00530	Total Suspended Solids	2/Week	2	1	02/22/2006
February 2006	001	00610	Nitrogen, Ammonia (NH3	2/Week	2	1	02/22/2006
February 2006	001	80082	CBOD 5 day	2/Week	2	1	02/22/2006
February 2006	601	00530	Total Suspended Solids	2/Week	2	1	02/22/2006
February 2006	601	80082	CBOD 5 day	2/Week	2	1	02/22/2006
March 2006	001	01074	Nickel, Total Recovera	1/Quarter	1	0	03/01/2006
March 2006	001	01094	Zinc, Total Recoverabl	1/Quarter	1	0	03/01/2006
March 2006	001	01113	Cadmium, Total Recover	1/Quarter	1	0	03/01/2006
March 2006	001	01114	Lead, Total Recoverabl	1/Quarter	1	0	03/01/2006
March 2006	001	01118	Chromium, Total Recove	1/Quarter	1	0	03/01/2006
March 2006	001	01119	Copper, Total Recovers	1/Quarter	1	0	03/01/2006
March 2006	001	01220	Chromium, Dissolved He	1/Quarter	1	0	03/01/2006
March 2006	001	00550	Oil and Grease, Total	1/Month	1	0	03/01/2006
March 2006	001	50092	Mercury, Total (Low Le	1/Quarter	1	0	03/01/2006
April 2006	001	00550	Oil and Grease, Total	1/Month	1	0	04/01/2006
May 2006	001	00550	Oil and Grease, Total	1/Month	1	0	05/01/2006
June 2006	001	00665	Phosphorus, Total (P)	1/Month	1	0	06/01/2006
June 2006	001	01074	Nickel, Total Recovera	1/Quarter	1	0	06/01/2006
June 2006	001	01113	Cadmium, Total Recover	1/Quarter	1	0	06/01/2006
June 2006	001	01114	Lead, Total Recoverabl	1/Quarter	1	0	06/01/2006
June 2006	001	01119	Copper, Total Recovers	1/Quarter	1	0	06/01/2006
June 2006	001	00550	Oil and Grease, Total	1/Month	1	0	06/01/2006
July 2006	001	00550	Oil and Grease, Total	1/Month	1	0	07/01/2006
July 2006	001	00530	Total Suspended Solids	2/Week	2	1	07/15/2006
July 2006	001	00610	Nitrogen, Ammonia (NH3	2/Week	2	1	07/15/2006
July 2006	001	80082	CBOD 5 day	2/Week	2	1	07/15/2006

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August 2006	001	50092	Mercury, Total (Low Le	1/Quarter	1	0	08/01/2006
August 2006	801	00610	Nitrogen, Ammonia (NH3	1/Quarter	1	0	08/01/2006
August 2006	801	31616	Fecal Coliform	1/Quarter	1	0	08/01/2006
August 2006	901	00610	Nitrogen, Ammonia (NH3	1/Quarter	1	0	08/01/2006
August 2006	901	31616	Fecal Coliform	1/Quarter	1	0	08/01/2006
September 2006	001	00550	Oil and Grease, Total	1/Month	1	0	09/01/2006
September 2006	581	00400	pH	1/Month	1	0	09/01/2006
September 2006	581	00627	Nitrogen Kjeldahl, Tot	1/Year	1	0	09/01/2006
September 2006	581	00668	Phosphorus, Total In S	1/Year	1	0	09/01/2006
September 2006	581	01003	Arsenic, Total In Slud	1/Year	1	0	09/01/2006
September 2006	581	01028	Cadmium, Total In Slud	1/Year	1	0	09/01/2006
September 2006	581	01029	Chromium, Total In Slu	1/Year	1	0	09/01/2006
September 2006	581	01043	Copper, Total In Sludg	1/Year	1	0	09/01/2006
September 2006	581	01052	Lead, Total In Sludge	1/Year	1	0	09/01/2006
September 2006	581	01068	Nickel, Total In Sludg	1/Year	1	0	09/01/2006
September 2006	581	01093	Zinc, Total In Sludge	1/Year	1	0	09/01/2006
September 2006	581	01148	Selenium, Total In Slu	1/Year	1	0	09/01/2006
September 2006	581	71921	Mercury, Total In Slud	1/Year	1	0	09/01/2006
September 2006	581	78465	Molybdenum In Sludge	1/Year	1	0	09/01/2006
September 2006	581	99991	Nitrogen, Ammonia In S	1/Year	1	0	09/01/2006
October 2006	001	00550	Oil and Grease, Total	1/Month	1	0	10/01/2006
November 2006	001	00550	Oil and Grease, Total	1/Month	1	0	11/01/2006
November 2006	001	00530	Total Suspended Solids	2/Week	2	1	11/22/2006
November 2006	001	00610	Nitrogen, Ammonia (NH3	2/Week	2	1	11/22/2006
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