



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

FILE COPY

April 21, 2011

Mr. Gerald Fruth
Water Treatment Plant Supervisor
141 East Broadway
P.O. Box 514
Village of Granville
Granville, OH 43023

Re: Notice of Violation - Village of Granville Water Treatment Plant National Pollutant Discharge Elimination System (NPDES) Ohio EPA Facility 4GW00001*AG

Dear Mr. Fruth:

This letter is written to continue discussion regarding how to prevent discolored water discharge from the Village of Granville water treatment plant lime sludge lagoon. As you may recall, my inspection report to you dated January 20, 2011, mentioned that I had noticed discolored discharge from the lagoon into the creek in April and November 2010. This letter also serves as a **Notice of Violation** regarding discolored wastewater discharge from the lagoon. Photographs of those two events are included in Figures 1 and 2 in this letter.

Part IV. Special Conditions in the water treatment plant wastewater discharge permit (OEPA Facility No.: 4GW00001*AG) read as follows:

Item C. - During a discharge, all iron/manganese removal and lime softening plants are required to routinely observe and report to the agency any change in color or turbidity noticed in the receiving stream downstream of the discharge point.

Item J.3. - The effluent from water plants shall, at all times, be free of substances in amounts that will alter the natural color or odor of the receiving water to such a degree as to create a nuisance.

On February 4, 2011, you and I spoke by telephone regarding your January 31, 2011, letter to me which contained a proposal to relocate the lime sludge lagoon discharge pipe outlet away from Raccoon Creek and into a drainage ditch. The drainage ditch would eventually discharge into Raccoon Creek.

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Your proposal was intended as a solution to the problem of discolored discharge from the lagoon into the creek. During our telephone discussion I advised you to not proceed with your proposal until this office could perform additional review of this matter.

Your proposal for relocating the lagoon discharge from the creek to a drainage ditch may, as you said, virtually eliminate discharge to Raccoon Creek. However, there would be times of inclement weather and saturated and/or frozen soil conditions during which discolored lagoon discharge could again flow to the creek. Your proposal would have simply moved the point of discolored discharge from one location to another and the problem would not yet have been permanently resolved. **With this in mind, this office cannot support your proposal.**

This office requires that the Ten States Standards for Water Works be used in evaluating the lime sludge lagoons. These standards can be viewed at this website: <http://10statesstandards.com/waterstandards.html#9.3> . Please use the Ten States Standards as you continue evaluation and selection of an option necessary to prevent discolored wastewater discharge.

During review of an aerial photograph of the lime sludge lagoon another problem was noted involving lime sludge stockpiling next to Raccoon Creek. Lime sludge stockpiling of this nature must be greatly minimized and must be managed so as to prevent runoff and to be protected from flooding. An aerial photograph of lime sludge storage next to the lagoon is included as Figure 3 in this letter.

I understand the Village of Granville is currently covered under Ohio EPA's MS4 (Municipal Separate Storm Sewer System) NPDES Permit. The MS4 permit requires the implementation of Best Management Practices (BMP's) to minimize storm water pollution associated with your municipal operations. The location of the lime sludge storage piles and the lack of any apparent BMP is contrary to the conditions of the MS4 permit.

At this time, I am formally requesting you contact Harry Kallipolitis, Storm Water Coordinator for Ohio EPA, to address corrective actions necessary to ensure compliance. Mr. Kallipolitis can be reached directly at 614-728-3844 or via email at harry.kallipolitis@epa.ohio.gov.

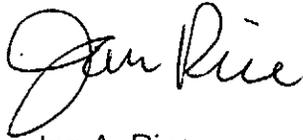
Please advise me in writing by May 9, 2011, regarding a time-line you intend using to address concerns noted in this letter. If problems noted in this letter are not resolved this office will proceed with expedited enforcement action which includes a monetary penalty and issuance of Director's Final Findings and Orders.

Depending on outcome of your review, a Permit to Install (PTI) from this office may be required for necessary improvements. Any PTIs submitted to this office must be signed by a Professional Engineer. If you have questions regarding this office's PTI program please contact Suzanne Matz by e-mail at Suzanne.matz@epa.ohio.gov or by telephone at 614-728-3853.

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I can be reached by e-mail at jan.rice@epa.ohio.gov or by telephone at 614-728-3850.

Sincerely,



Jan A. Rice
Environmental Specialist
Compliance/Enforcement Group
Division of Surface Water
Ohio EPA/CDO

c: Allison Terry, Acting Village Manager
Melissa Hartfield, Village of Granville Mayor

JAR/nsm Granville WTP hak