



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

December 21, 2007

RE: CARROLL COUNTY  
MINERVA WWTP  
NPDES PERMIT NO: OH0021849  
OHIO EPA PERMIT NO. 3PC00023  
COMPLIANCE EVALUATION INSPECTOIN

**NOTICE OF VIOLATION**

Mayor and Council  
Village of Minerva  
209 North Market Street  
Minerva, OH 44657

Dear Mayor and Council:

On December 12, 2007, this writer conducted a compliance evaluation inspection at the Village of Minerva WWTP. The facility was represented by Mr. Don Luedtke, Superintendent, and is located on the south side of State Route 183 and discharges to Sandy Creek.

At the time of the inspection the following observations and comments were noted:

- 1) The plant was producing a typical secondary effluent. Rain from the day before was producing some high flows and some solids were going over the final clarifiers. The sludge blanket in the clarifiers was just below the weir troughs. The aeration tanks had a good brown color with some foam on top. The foam may be indicative of a high sludge age. The plant was in the process of wasting sludge from the system. The sludge volume index (SVI), food to microorganism ratio (F/M ratio), and mixed liquor suspended solids (MLSS) should be run on a regular basis, minimally by-weekly. The program of "cannibalizing" requires a great deal of process control. These process controls will change with flow and temperature. Without running process control parameters on a regular basis, maintaining the proper sludge levels within the wastewater treatment system will be almost impossible.
- 2) The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. A visual observation of the plant effluent was not possible since the outfall was submerged in the creek as a result of the storm conditions. Waste sludge from the facility is sent to American Landfill. At the time of the inspection the sludge press was being rehabbed and should be back on line within a week.
- 3) The by-pass in a manhole on the influent line to the wastewater treatment plant has been closed off. The temporary measures should be replaced by a blind flange bolted down. This would seal it off and still allow for maintenance when necessary.
- 4) A review of the operating data from March 2005 through October 2007 revealed only a few violations. These violations have been attached for your review.
- 5) The Village submitted a Sanitary Sewer System Report on September 21, 2005. The report identifies areas that are causing extraneous flows; however, further work was necessary to identify the cause of the water entering the system. The Village needs to follow up this study and complete the Infiltration/Inflow study required in the NPDES

Mayor and Council  
Village of Minerva WWTP  
December 21, 2007  
Page 2

permit. The permit required fixed date schedule of milestone dates for the implementation of improvements. The superintendent has indicated some rehabilitation on the sewers has been completed, but an on-going effort to maintain the system must be established.

- 6) Detail plans for the Emergency Stand-By Power was to have been submitted by July 2005. Construction and installation of the Stand-by Power was to have been completed by March 2006. To date this office has no record of this being completed. **This is a violation of the Village's NPDES permit.**

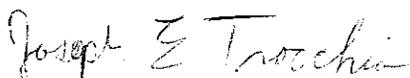
**Action Items:**

- 1) The Village must establish a program to run all appropriate process control parameters necessary to maintain the "cannibalization" process, i.e., SVI, MLSS, MLVSS, F/M ratio, etc. The current operation plan that is being utilized to manage the system should be submitted to this office.
- 2) Provide this office a schedule to complete the Infiltration/Inflow studies. Also, a date specific schedule to complete all sewer improvements necessary to eliminate infiltration/inflow. This work could be accomplished over several years.
- 3) Provide a schedule to construct the Emergency Stand-By Power.
- 4) Provide a schedule to install the blind flange to eliminate the overflow at the head of the plant.

Within approximately fourteen days I expect to complete the draft permit renewal. Any comments or input you may have during this period will be appreciated.

Should you have any comments or questions regarding this letter, please feel free to me at (330) 963-1193.

Sincerely



Joseph E. Trocchio, P.E.  
Environmental Engineer  
Division of Surface Water

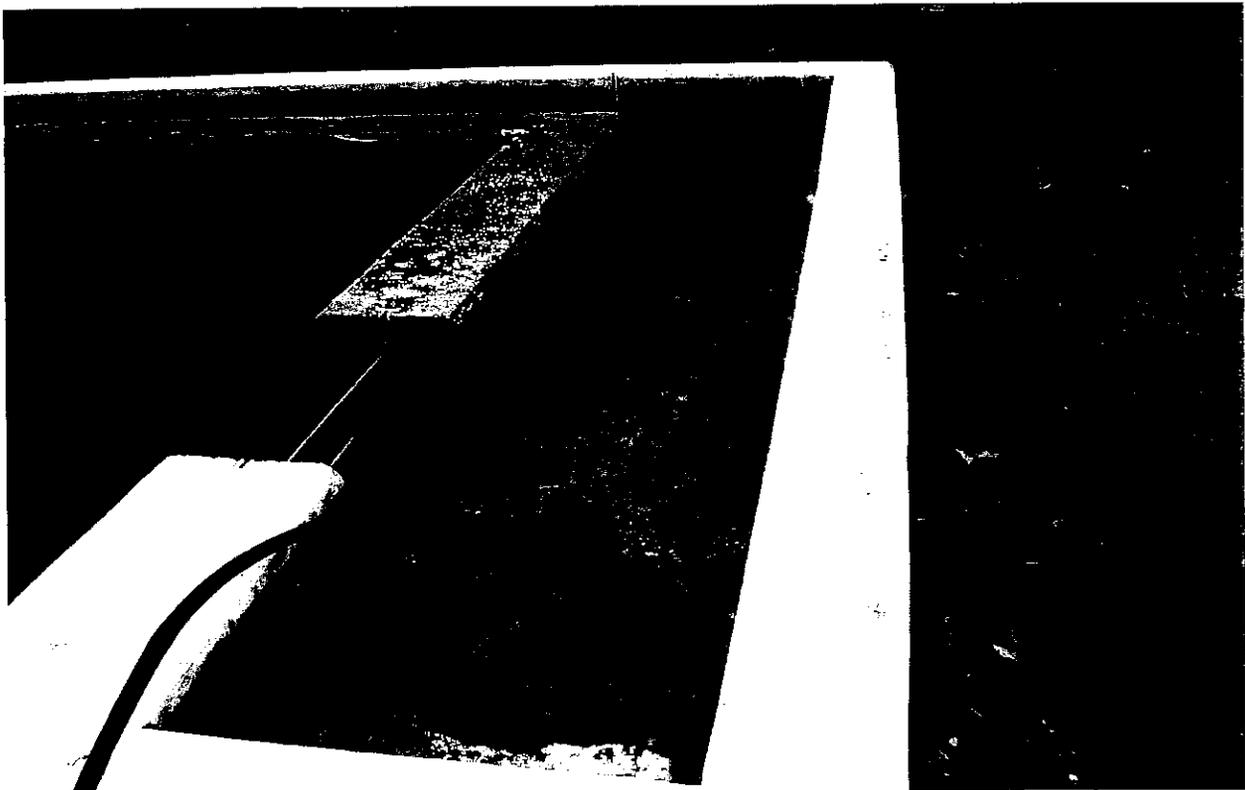
JET/mt

cc: Don Luedtke, Superintendent, Minerva  
ec: Ronald A. Bell, Ohio EPA, DSW, NEDO  
File: Public/Permit Compliance

**INSPECTION PHOTOS**



**HIGH SLUDGE BLANKET WITH SOLIDS GOING OVER THE WIERS.**



**PLANT EFFLUENT WITH SOLIDS DISCHARGING TO SANDY CREEK.**

**CITY OF MINERVA VIOLATIONS: JULY 2005 - OCTOBER 2007**

Permit No	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PC00023*HD	Fecal Coliform	7D Conc	2000	2921.84	6/8/2005
3PC00023*HD	Oil and Grease, Total	1D Conc	10	16.6	10/26/2006
3PC00023*HD	Copper, Total Recoverable	1D Conc	52	157.	12/5/2006
3PC00023*HD	Copper, Total Recoverable	1D Qty	0.183	.43142	12/5/2006
3PC00023*HD	Dissolved Oxygen	1D Conc	6.0	.	12/11/2006
3PC00023*HD	Mercury, Total (Low Level)	30D Conc	150	949.	12/1/2006
3PC00023*HD	Mercury, Total (Low Level)	30D Qty	0.0005	.00308	12/1/2006