



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

January 18, 2008

RE: LAKE COUNTY  
VILLAGE OF MADISON WWTP  
COMPLIANCE EVALUATION INSPECTION  
NPDES PERMIT #OH0023515  
OEPA PERMIT # 3PB00030

Mayor, Council & Administrator  
Village of Madison  
126 West Main Street  
P.O. Box 7  
Madison, OH 44057

Ladies/Gentlemen:

On January 8, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant serving the Village of Madison. The purpose of the inspection was to evaluate the treatment facility's compliance with the terms and conditions of the NPDES permit. The village's temporary plant operator, Mr. Mark Lewis, accompanied this writer during the inspection.

At the time of inspection, the plant was discharging an effluent of satisfactory visual quality. Maintenance of the plant grounds was satisfactory. All treatment units were operating.

Several observations were made during the inspection that require addressing:

- The village's temporary plant operator was not using the current, finalized NPDES permit for the treatment plant. The current NPDES permit has different sampling and monitoring requirements from the previous NPDES permit. *The current, finalized NPDES permit must be kept at the plant site and must be used by the operator at all times.* Another copy of the current NPDES permit is enclosed with this letter for your convenience. The current NPDES for the Village of Madison can also be found on the Ohio EPA Web site at [www.epa.state.oh.us/dsw/permits](http://www.epa.state.oh.us/dsw/permits).
- The effluent composite sampler did not contain a thermometer immersed in water to verify that the temperature of the sampler is kept at 4 degrees Celsius. A thermometer that is immersed in water must be kept in the refrigeration compartment of the sampler at all times.
- Erosion is occurring around the bulkhead of the final outfall. The village should take steps to curtail the erosion.
- The village's current NPDES permit required the construction of signage at the plant's effluent Outfall 001 by August 1, 2008. No signage has been erected at Outfall 001.

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During the inspection, the question of proximity of the downstream sampling location to the effluent discharge pipe location arose. The water quality group of this division recommends as a rule of thumb, that the sampling location downstream of the plant effluent discharge pipe must be a distance equal to five times the width of the receiving stream. This distance should be sufficient to keep the downstream sampling location out of the effluent/stream mixing zone.

A review of the self-monitoring reports covering the period of November 2006 through November 2007 revealed the following effluent frequency violations:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50092	Mercury, Total-Low Level	1/Quarter	1	0	08/01/2007
601	50092	Mercury, Total-Low Level	1/Quarter	1	0	08/01/2007

Also, the village has failed to submit Monthly Operating Reports (MORs) for June 2007, October 2007, and November 2007. Monthly Operating Reports that are submitted electronically must be received by the 20<sup>th</sup> day of the month following the month-of-interest. MORs using Form 4500 must be received by the 15<sup>th</sup> day of the month following the month-of-interest.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring, reporting, or compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111.

Several upcoming submittals, as required by the village's NPDES permit will be due this year. On January 31, 2008, the sludge disposal summary is required. On March 1, 2008, the sanitary sewer overflow annual report is required. On November 1, 2008, a letter addressing the village's ability to comply with the water quality based effluent limits for mercury must be submitted to this office. Please carefully review the NPDES permit for additional information and requirements.

The Division of Surface Water (DSW) is incorporating a new reporting system. What is now referred to as SWIMware and Monthly Operating Reports (MORs) will be called e-DMR's (Electronic Discharge Monitoring Reports). DSW contracted with enfoTech & Consulting, Inc ([www.enfotech.com](http://www.enfotech.com)) to assist with replacing the current SWIMware version. The new reporting system will be entirely Web based and accessible via any Internet connection. Training on this system is currently available this year. All current and new users will eventually be urged to start using the new version. A few features include: import, copy and paste, multiple PINS for multiple people involved, submit "online", user friendly interface, and secure. e-DMR's are being developed first followed by NPDES applications and it is envisioned that many other DSW forms will be

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accessible through this online application in the future. For further information, please refer to the DSW Web site <http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>.

In a letter dated November 14, 2007, Mr. Matthew Zapp, Village Administrator, stated that the village will continue negotiations with the Lake County Department of Utilities regarding a full system transfer. If the transfer occurs, he states that Lake County will assume control of the plant and provide a full-time operator. If negotiations fail, Madison Village will repost the position for a Class III wastewater treatment operator in an attempt to locate a full-time, in-house operator. Mr. Zapp states that the decision should be determined by July 2008.

*No later than August 1, 2008, this office requires a letter stating what steps the village has taken to meet the NPDES requirement for a full-time, Class III wastewater treatment plant operator. Be advised that the village's current use of a part-time Class III operator is a temporary measure only.*

*Please inform this office, in writing, within ten days of the date of this letter, the reasons for the referenced violations and deficiencies, as well as a description of the actions taken to prevent any further violations. Your response should include proposed dates for completion of the actions.*

Sincerely,



Marie Underwood, P.E.  
Environmental Engineer  
Division of Surface Water

MU/mt

enclosure: Copy of NPDES Permit