



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 9, 2009

RE: WAYNE COUNTY
CITY OF WOOSTER
NPDES# 3PD00013

NOTICE OF VIOLATION

CERTIFIED MAIL

Mayor Robert Breneman
City of Wooster
1020 Old Columbus Road
Wooster, Ohio 44691-4618

Dear Mayor Breneman:

A summary of the City of Wooster's wastewater treatment plant discharge violations for outfall 001 for the months of September 2009 are shown below:

September 2009

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2009	001	Fecal Coliform	1D Conc	2000	3500.	9/14/2009
September 2009	001	Fecal Coliform	1D Conc	2000	4000.	9/21/2009
September 2009	001	pH, Minimum	1D Conc	6.5	6.3	9/21/2009
September 2009	001	pH, Minimum	1D Conc	6.5	6.	9/22/2009
September 2009	001	pH, Minimum	1D Conc	6.5	6.3	9/23/2009
September 2009	001	Dissolved Oxygen	1D Conc	7.0	6.9	9/26/2009
September 2009	001	Fecal Coliform	1D Conc	2000	46000.	9/28/2009
September 2009	001	Dissolved Oxygen	1D Conc	7.0	5.8	9/28/2009

Our office is in receipt of the City's October 26, 2009, letter addressing the above noted violations. The letter stated that the wet weather events were less severe for the month of September. However, during wet weather events, the plant experiences increased flows to the plant. It is understood during wet weather events, the plant is operated in contact stabilization mode. The poor sludge settleability that occurs in the final clarifiers results in solids bulking during the heavy rain events and attributes to the Fecal Coliform, DO and pH violations.

MAYOR ROBERT BRENNEMAN
NOVEMBER 9, 2009
PAGE 2

The Fecal Coliform violations were attributable to the decreased UV efficiency caused by the increased turbidity in the plant effluent. It is understood the contact stabilization mode does not provide as clear an effluent as would be desired. In addition, it was discovered UV unit #2 was not performing accordingly and was repaired with the bulbs and sleeves replaced. It is understood the September 26th pH violation was impacted by a mode change to accommodate the higher flows and only lasted one hour. Therefore, in accordance with the NPDES permit, the pH event on September 26th constituted a Permitted High Flow Caused Excursion (PHFCE).

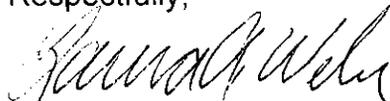
The City discontinued the use of the Archea from Arkea Solutions. It is understood the batch in use expired on August 24, 2009. The City has not ordered a replacement batch of the product. The City may reorder more of the treatment should noncompliance increase after ceasing the additives. To date, there does not appear to be any negative impacts from the discontinuation of the Archea.

The City continues to feed polymer at the headworks of the wastewater treatment plant. The polymer addition has increased the DAF unit efficiency and it appears the primary clarifier efficiency has improved. The City has begun feeding a second polymer at the secondary clarifier distribution chamber. It is understood this polymer feed combination has provided some assistance with the organic overloading and poor sludge settling issues.

The PTI for the City's biotower project has been submitted and reviewed; there are currently comments which have not been resolved. If the City and its representatives have questions regarding the PTI application, please contact Ms. Donna Kniss of this office at (330) 963-1285.

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:bo

pc: Mr. Jim Borton, Utilities Manager
Mr. Lee Troyer, Pretreatment Coordinator
Wayne County Health Dept.

ec: Rich Blasick, P.E., Ohio EPA, DSW, NEDO
Virginia Wilson, P.E., Ohio EPA, DSW, NEDO
Larry Reeder, Ohio EPA, DSW Enforcement, Central Office
Bill Fischbein, Ohio EPA, Legal
Dennis Deniro, DEFA

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11/9/09

Sent To: Mr. Rob. Brannen
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