



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

November 18, 2008

RE: WAYNE COUNTY
CITY OF WOOSTER
NPDES# 3PD00013

NOTICE OF VIOLATION

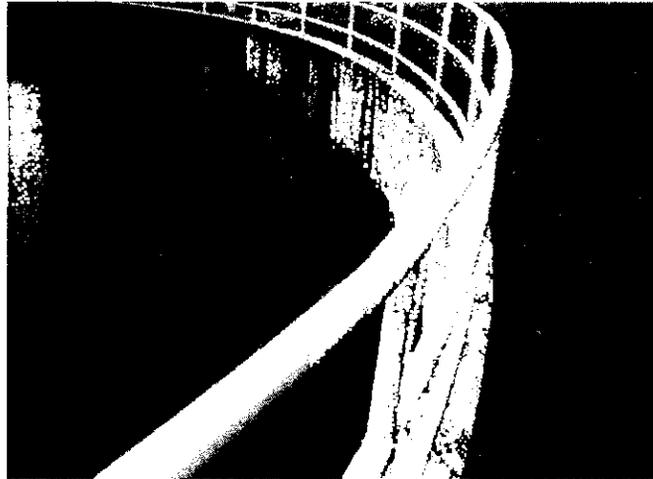
CERTIFIED MAIL

Mayor and Council
City of Wooster
1020 Old Columbus Road
Wooster, Ohio 44691-4618

Dear Mayor and Council:

On November 7, 2008, this writer, accompanied by Bill Zawiski of this office met with Mr. Lee Troyer to conduct an inspection of the wastewater treatment plant serving the City of Wooster (City). The intent of the inspection was to evaluate the progress of the wastewater treatment plant compliance issues. Part of the inspection was to evaluate the current operation and maintenance of the treatment system. The inspection revealed the following:

- 1) As you are aware, this office has recommended enforcement action be taken against the City for continued noncompliance with the NPDES permit. During the inspection, we discussed some ongoing compliance issues that are affecting the wastewater treatment plant. It was mentioned that the Ammonia, CBOD and Total Suspended Solids violations can be linked to periods when the sludge lagoons were decanted. While this is not always the situation, we recommend that you refrain from sending the decant back to the plant until the plant shows a significant improvement in operation and can maintain a complete month of compliance.
- 2) The vertical loop reactors appeared to be in good condition. There was a good chocolate brown color in the tanks and good mixing was being provided. The final clarifiers (the "old finals") were in poor condition and were bulking up with sludge which was overflowing the weirs as can be seen in the picture shown below:



In addition, pin floc was visually seen going over the weirs of the final clarifiers. The bulking of the sludge in the final clarifiers is due to lack of pumping out the clarifiers between heavy rain events. This is a maintenance/housekeeping issue and should not be seen at a facility of this size. It is our expectation that these clarifiers should be on a routine cleaning schedule.

- 3) Our records reveal noncompliance with NPDES permit limits for Fecal Coliform at least 21 times since the beginning of this past disinfecting season. The UV self cleaning bulb mechanism has malfunctioned numerous times this past year. It is our understanding that to clean the bulbs manually, an entire UV unit must be taken out of service. This is an operation and maintenance concern to our office as it is affecting the quality of the effluent and must be addressed.
- 4) All wastewater treatment plants that treat over 1.0 MGD of wastewater and have areas at the treatment plant that are subject to storm water runoff are subject to further storm water requirements in the NPDES permit. During the inspection, we found chemicals stored outside near the grit removal system. The chemicals were contained in plastic containers and were not provided with spill containment. Because the chemical containers were exposed to storm water and not provided with spill containment, the facility is subject to further storm water permitting requirements. Your NPDES permit will be modified to incorporate Parts 4, 5 and 6 and you will be required to develop a storm water pollution prevention plan. Because your NPDES permit has not been finalized through the Attorney General's Office, a copy of this letter has been forwarded to their office and this information will be incorporated into the permit.

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To waive the storm water requirements from your NPDES permit, you must move all chemicals and fueling stations that are subject to storm water runoff indoors or construct a roof over these storage areas. In addition, to qualify for this waiver, a No Exposure certification must be filed with our Central Office. This form can be found at http://www.epa.state.oh.us/dsw/storm/ind_noexp_cert.html. If you have any immediate concerns regarding the storm water requirements for your facility, please contact Kelvin Rogers at (330) 963-1117.

- 5) A summary of the wastewater treatment plant discharge and frequency violations for the period of July 1, 2008 through October 1, 2008 has been attached to this letter. It is our understanding the ammonia violations resulted from sludge lagoon decanting and sludge bulking. The facility has increased the aeration capacity by operating a second blower to try to improve the bulking issue and aiding in total suspended solids treatment.

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

Attachment: Violation list

cc: Jim Borton, Utilities Manager
Lee Troyer, Pretreatment Coordinator
Andrew Conway, Ohio EPA, DSW Enforcement, CO
Lauren Angell, Assistant Attorney General of Ohio
Wayne County Health Dept.

ec: Rich Blasick, P.E., Ohio EPA, DSW, NEDO
Bill Zawiski, Ohio EPA, DSW, NEDO
Virginia Wilson, P.E., Ohio EPA, DSW, NEDO

NPDES Permit Limit Violations

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	5.4	7/7/2008
July 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.19	7.7	7/8/2008
July 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	62	240.019	7/8/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	4.6	7/8/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	4.7	7/9/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.	7/10/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.	7/11/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	5.4	7/12/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.2	7/13/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.5	7/14/2008
July 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.19	6.9	7/15/2008
July 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	62	168.581	7/15/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.3	7/15/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	4.5	7/20/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.	7/21/2008
July 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.4	7/26/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.46	3.13529	8/1/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	41	54.6916	8/1/2008
August 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.8	8/9/2008
August 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.2	8/10/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.19	3.43333	8/15/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	62	68.4171	8/15/2008
August 2008	001	31616	Fecal Coliform	1D Conc	2000	130000.	8/18/2008
August 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	3.3	8/18/2008
August 2008	001	31616	Fecal Coliform	1D Conc	2000	234000.	8/19/2008
August 2008	001	31616	Fecal Coliform	1D Conc	2000	340000.	8/20/2008
August 2008	001	61942	pH, Minimum	1D Conc	6.5	6.3	8/20/2008
August 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.4	8/21/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.19	4.46	8/22/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	62	77.5230	8/22/2008
August 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	4.5	8/25/2008

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2008	001	00300	Dissolved Oxygen	1D Conc	7.0	5.8	8/27/2008
September2008	001	00530	Total Suspended Solids	30DConc	16	19.1666	9/1/2008
September2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.19	2.375	9/1/2008
September2008	001	00530	Total Suspended Solids	7D Conc	24	90.3333	9/8/2008
September2008	001	00530	Total Suspended Solids	7D Qty	682	1616.80	9/8/2008
September2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.19	3.16667	9/8/2008
September2008	001	80082	CBOD 5 day	7D Conc	15	23.6666	9/8/2008
September2008	001	00300	Dissolved Oxygen	1D Conc	7.0	4.	9/8/2008
September2008	001	00300	Dissolved Oxygen	1D Conc	7.0	3.5	9/9/2008
September2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.5	9/10/2008
September2008	001	00300	Dissolved Oxygen	1D Conc	7.0	4.1	9/13/2008
September2008	001	00300	Dissolved Oxygen	1D Conc	7.0	6.5	9/15/2008
September2008	001	31616	Fecal Coliform	1D Conc	2000	4600.	9/30/2008

NPDES Permit Frequency Violations

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2008	001	00530	Total Suspended Solids	3/Week	3	2	08/08/2008
August 2008	001	00610	Nitrogen, Ammonia (NH3)	3/Week	3	2	08/08/2008
August 2008	001	80082	CBOD 5 day	3/Week	3	2	08/08/2008
August 2008	601	00530	Total Suspended Solids	3/Week	3	2	08/08/2008
August 2008	601	80082	CBOD 5 day	3/Week	3	2	08/08/2008

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