



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 13, 2008

RE: WAYNE COUNTY
CITY OF WOOSTER
NPDES# 3PD00013

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

Dear Mayor and Council:

On June 5, 2008, this writer, accompanied by Rich Blasick and Dean Stoll of this office, along with Gretchen Fickle and Dennis Deniro of the Division of Environmental Financial Assistance (DEFA) met with Mr. Jim Borton and Mr. Ken Kinney at the City of Wooster (City) wastewater treatment plant. The purpose of our meeting was to discuss compliance and operational issues that have been encountered with the newly constructed wastewater treatment plant. This letter will only reference the findings made by Division of Surface Water staff.

During our previous meeting on April 16, 2008, Mr. Borton indicated that he anticipated the facility would obtain compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit by July 1, 2008. This date was previously accepted by this office as the final date to get the wastewater treatment plant online and meeting all effluent limits. We understand the numerous conditions encountered at the wastewater plant could not entirely have been prevented. However, the level of noncompliance that has resulted from the construction phase and start up phase of this wastewater treatment plant is significant.

Our findings during the inspection of the wastewater treatment plant were not satisfactory. The influent screening unit was operational, but it is understood that the dewatering portion of the unit is still awaiting replacement. The primary clarifiers had rags stuck on the weirs which were from previous failures of the raw influent screening.

The final clarifiers were loaded with sludge which was thought to be attributable to the "slime bulking" at the facility. Mr. Borton indicated the slime bulking is due to nutrient deficient conditions. Additionally, the clarifiers had floating solids, significant sludge accumulation and there was a slime growth on the weirs and sidewalls. Mr. Borton had some indications that this may be due to industrial discharges. The City has an approved pretreatment program through Ohio EPA. Failure to adequately implement the program to prevent pass through of pollutants and interference with the wastewater treatment plant's ability to meet final effluent limits is a violation of the permit. Should the City need additional assistance addressing the industries, please contact Donna Kniss of our office at (330) 963-1285.

The final effluent Dissolved Oxygen level is monitored by a probe located in a small tank/slop sink after the UV disinfection process. The probe and tank were covered with slime growth and the probe was registering an effluent value of 6.1 mg/L. Subsequently, the operator cleaned the probe in our presence. After the probe was cleaned, it began registering effluent values between 6.7 mg/L and 6.8 mg/L. All of the values observed were in violation of your NPDES permit limit for Dissolved Oxygen (minimum of 7 mg/L). The final effluent leaving the plant was grey in color with significant solids. The effluent was visually observed discoloring the Killbuck Creek.



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Our office has taken every opportunity feasible to offer solutions, work with the City and utilize enforcement discretion. However, due to approximately two years of noncompliance and the findings from our recent inspection on June 5, 2008, Northeast District Office will be recommending initiation of enforcement against the City to address the effluent violations. We highly suggest the wastewater treatment plant strive to achieve compliance with all NPDES permit limits as soon as possible. If compliance is obtained, this would be an added benefit to the City when the case is reviewed by our enforcement coordinators and legal staff.

We understand Mr. Borton has contacted Cathy Alexander of our compliance unit in Columbus to inquire about obtaining assistance from members of the compliance unit. Please keep Northeast District Office notified of any communication the City may have with our Central Office staff. If the compliance unit has any plans to visit the wastewater treatment plant, our office would be interested in being in attendance.

As a reminder, the City's efforts to get the wastewater treatment plant operational and in compliance are well noted. 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

cc: Jim Borton, Utilities Manager
Ken Kinney, Superintendent
Loretta Firis, Wayne County Health Dept.

ec: Rich Blasick, P.E., Ohio EPA, DSW, NEDO
Dean Stoll, P.E., Ohio EPA, DSW, NEDO
Gretchen Fickle, Ohio EPA, DEFA, CO
Cathy Alexander, Ohio EPA, DSW, CO

File: Public/Wooster P&C