



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 18, 2011

RE: ANDOVER WATER TREATMENT PLANT
NPDES PERMIT NO. 31Y00013*DD
ANDOVER VILLAGE, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Joseph DiBell, Village Administrator
Village of Andover
P.O. Box 1267
134 Maple Street
Andover, OH 44003

Dear Mr. DiBell:

On April 14, 2011, a site inspection was conducted at the above referenced facility at 155 Maple Street, Village of Andover, Ashtabula County. The inspection was conducted by John Schmidt of this office. Richard Mead, Plant Superintendent, represented the Village of Andover (Andover). The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on April 8, 2010.

The system consists of a three sand filters containing "green sand" to filter raw drinking water. Potassium permanganate and hydrofluoric acid (fluoridization) are no longer used at this facility. The tanks are backwashed with chlorinated water from the water tower at a rate of 540 gpm for 12 minutes per cycle. Wastewater consists of tank backwash. The wastewater treatment system consists of a diversion chamber where sodium bisulfite tablets are added for dechlorination, surface sand filters, and an effluent manhole for sample collection. Sludge management includes manual removal of accumulated sludge for storage behind the Village Hall at 134 Maple Street, with ultimate disposal at a landfill. The facility discharges to Wade Creek adjacent to the south side of the facility. No backup power is provided to the wastewater treatment processes.

Observations

Following are observations made during the inspection.

1. The design flow of treatment process is 10,000 gallons per day, although the plant was not in backwash mode at the time of the inspection.
2. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept.

3. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.
4. Sand filters were clean and operable, and reasonably free of vegetation. No standing water was observed. The wastewater percolated freely through the sand indicating that the beds were not clogged.
5. The final effluent was clear as observed in a manhole between the plant and the final outfall and found of acceptable visual quality. The final discharge at Wade Creek could not be observed as it was partially submerged by the creek.
6. Samples are collected by Mr. Mead. Mr. Mead performs on-site analysis of pH and performs observations of color and turbidity. Mr. Mead also performs some laboratory analysis of collected samples at the Andover WWTP. Remaining laboratory analysis is performed by Microbac Laboratories.
7. Mr. Mead submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
8. The Village of Andover has had problems with disposal of the accumulated sludge. According to Mr. DiBell, samples collected showed elevations of arsenic that disposal was refused by Waste Management Inc. at their Geneva Landfill. Analytical data could not be located during the visit, and was requested to be forwarded to this office as soon as it is located.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2010 through March 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	.29	3/22/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	.08	4/23/2010
001	00530	Total Suspended Solids	30D Qty	1.14	3.02636	6/1/2010
001	01054	Manganese, Suspended	30D Qty	0.04	.07332	6/1/2010
001	00530	Total Suspended Solids	1D Qty	1.7	3.02636	6/18/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	.05	9/15/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	.08	11/19/2010

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Ohio EPA notes that the chlorine residual violations placed the Village of Andover in significant noncompliance, and Ohio EPA notified you of this on August 5, 2010. A response to the chlorine violations was not provided to Ohio EPA. During the visit, the cause may be insufficient contact with the sodium bisulfide tablets in the sand filter diversion chamber and the final outfall, due to the high flows of wastewater during the backwash cycle (540 gpm). Additional tablet dechlorinators or liquid dechlorination may be warranted. If liquid dechlorinators are envisioned, a permit-to-install (PTI) is required. Effluent limit violations must be explained in writing, along with measures to ensure that it is not repeated.

If Andover feels some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Reporting Violations

No reporting code or frequency violations were noted for the period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the period reviewed.

Other Violations

Ohio EPA notes that the Village of Andover accumulates its water treatment plant sludge at the rear of its administrative offices at 134 Maple Street, across the street and north of the Andover Water Treatment Plant. Based upon our discussions, you could not recall the last time sludge was disposed at a landfill pursuant to your NPDES permit. This sludge is considered a waste and must be disposed at a municipal solid waste disposal facility pursuant to Part II-B1 and Part C-A of your permit. Sludge cannot continue to accumulate indefinitely behind the administration building. During the visit, we discussed other landfills in nearby Mahoning County, Lake County, and Stark County that may be able to accept the sludge for disposal, provided that it is nonhazardous. Copies of any analytical data on the sludge should be forwarded to this office as soon as possible to ascertain the sludge's regulatory status.

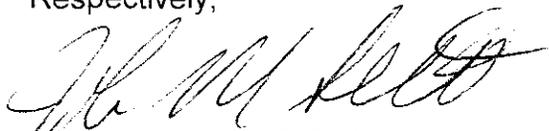
Based upon the inspection findings and the overall compliance record of the facility, the Village of Andover is considered to be in substantial compliance regarding its Andover Village Water Treatment facility; however the above limit violations and other violations should be explained, along with a resolution.

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Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

pc: Richard Mead, Village of Andover

File: Industrial/Andover WTP/PC