



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

October 23, 2007

RE: WELLINGTON WTP
PERMIT NO. 3IV00200*DD
LORAIN COUNTY

Mayor and Council
Village of Wellington
115 Willard Memorial Square
Wellington, OH 44090

Dear Mayor and Council:

On October 18, 2007, an inspection of the above referenced facility's wastewater treatment lagoons was conducted. The facility was represented by Mr. Mark Rosemark, Superintendent.

The wastewater treatment system is currently permitted for a discharge of 140,000 gpd. Currently the wastewater treatment system has been discharging on average 26,393 gpd with a maximum discharge of 95,000 gpd since November 1, 2005.

During the inspection the following items were noted/ discussed:

1. Ohio EPA has no record of any sludge being removed from the lagoons since the previous permit was issued July 31, 2000.
2. The existing NPDES permit contains a schedule of compliance which requires the Village of Wellington Water Treatment Plant to submit a Sludge Management Plan no later than 6 months from the effective date of the permit. The permit became effective on March 1, 2006. To date, no Sludge Management Plan has been received by this office.
3. **The sludge from the water treatment plant is not permitted to be blended with the sludge from the wastewater treatment plant for the purpose of land application. This office considers the sludge from the water treatment plant to be a solid waste and should be disposed of accordingly.**
4. The facility has two sludge lagoons. Currently, only lagoon one is being utilized although plumbing exists which allows both to receive backwash waters.
5. A third lagoon exists which has no piping plumbed to it. This lagoon is only used for sludge holding. Recently sludge from lagoon one was pumped into lagoon three for storage.
6. Mr. Rosemark indicated that the Village does not currently have the financial means to dispose of the sludge in a solid waste landfill and have therefore chosen to store the sludge in lagoon three until next year.
7. Based on items 2 and 3 above, it has been determined that a Sludge Management Plan is no longer required. In lieu of the Sludge Management Plan, a letter from the Village of Wellington stating which solid waste landfill the water treatment plant sludge is going to be hauled to will be required. This letter should be submitted to the Ohio EPA Northeast District Office when the final destination of the water treatment plant sludge has been determined.
8. Fencing was installed around lagoon three this summer.

9. The discharge into the manhole from lagoon one was not easily observed. However, the discharge that leaves the property by the water treatment plant driveway was clear in color.
10. Wellington WWTP conducts all of the analytical testing for the water treatment plant with the exception of trihalomethane, total and sludge. Jones & Henry performs all the contract lab work.
11. Mr. Rosemark indicated that the paperwork for the trihalomethane frequency violation noted below for December 2006 was found. He indicated that this data would be amended in Ohio EPA's Surface Water Information Management System, SWIMS.
12. Mr. Rosemark also indicated that the Trihalomethane data submitted for June 2007 was incorrect. This data was a drinking water result and not a wastewater result. Mr. Rosemark also indicated he would amend this data.

This office has recently reviewed your self-monitoring reports covering the period November 1, 2005, through August 31, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Frequency Violations

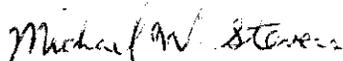
| Violation Date | Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported |
|----------------|---------|----------------|-----------------------|------------------|----------|----------|
| 12/1/2005 | 002 | 82080 | Trihalomethane, Total | 2/Year | 1 | 0 |
| 5/1/2006 | 002 | 82080 | Trihalomethane, Total | 2/Year | 1 | 0 |
| 12/1/2006 | 002 | 82080 | Trihalomethane, Total | 2/Year | 1 | 0 |
| 6/1/2007 | 002 | 82080 | Trihalomethane, Total | 2/Year | 1 | 0 |

Trihalomethane is required to be sampled on a semi-annual basis. This is defined in the back of the facility's permit as the months of June and December.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of surface Water

MWS/mt

cc: Mark Rosemark, Wellington WTP