



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

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

Re: Huron County
Village of Greenwich
Notice of Violation (NOV)

July 7, 2010

Mayor and Council
Village of Greenwich
P.O. Box 13645
Greenwich, Ohio 44837

Dear Mayor and Council:

On April 27, 2010, Ohio EPA representatives Andrew Gall and Dan Gill conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection of the wastewater treatment plant (WWTP) serving the Village of Greenwich. Mr. Mike King, Village Administrator and Mr. Shawn Pickworth, Utility Worker were present and provided information on plant operations and maintenance. The inspection included a review of the plant records and questions related to the implementation of the Village's CSO Long Term Control Plan.

The Village operates a 0.20 MGD continuous discharge 3-cell lagoon system. During the visit, there was a discharge to the southwest branch of the Vermilion River. Discharge monitoring reports have been submitted as required by your NPDES permit. Mr. King indicated that he does the daily sampling as required by the permit and that the Village has a contract with MASI Labs for the remainder of the parameters. A review of the discharge data submitted since our last inspection indicates that there have not been any effluent limit violations.

Currently, the Village is in **violation** of the following requirements contained in its NPDES permit.

1. The outfall signage requirements contained in Part II, Item L of the NPDES permit. The signs were required to have been placed at each outfall (effluent & CSO) by January 1, 2009. You were reminded of this requirement during our April, 2009 inspection and to date still remain out of compliance with this requirement.
2. Part I, C – Schedule of Compliance Item A. requires the Village to submit an annual report summarizing its combined sewer overflow activations and volumes and CSO control activities during the previous year. The first report should have been submitted by February 1, 2009 followed by the second report in February, 2010. To date these reports have not been received.
3. Part I, B requires the Village to monitor its CSOs and provide monthly reporting to Ohio EPA. During the inspection it was determined that the Village has still not set up a program to regularly inspect the CSOs during and after rain events making it difficult to properly monitor and report CSO characteristics.

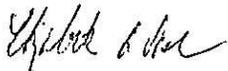
4. Part I, C – Schedule of Compliance Item B. requires the Village to enact and enforce an ordinance requiring inspection and maintenance of septic tanks that are tributary to the Village's sanitary sewer system. The ordinance was required to have been adopted and the inspection program begun by October, 2008. To date Ohio EPA has not received a copy of the ordinance that was passed by the Village and there was no indication that inspections have been taking place. The Village must take immediate steps to come into compliance with this requirement.
5. Part II, Item E requires the Village to implement the Nine Minimum Controls for CSO abatement. As was previously noted in notice of violation letters dated April 21, 2008 and May 15, 2009, the Village continues to be in violation of these requirements. Specifically, the Village is not adequately implementing a proper operation and maintenance program for the CSOs, is not prohibiting dry weather overflows, is not implementing a public notification program, and is not conducting monitoring to characterize CSO impacts and the efficacy of control measures.

We also discussed the January 1, 2011 deadline to complete construction of Lift Station #2 CSO consolidation. To date Ohio EPA has not received a Permit to Install (PTI) application for this project. Therefore, we request that the Village update us as to the status of this project and if the January 1, 2011 deadline will be met.

We will await your written response indicating what immediate steps the Village will take to address the above noted violations and come back into compliance with its NPDES permit. Your response must contain a timeline for completing each activity. Please submit a copy of your response to this letter within 21 days of the date on this letter to Mr. Gall's attention at: Ohio EPA, Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. At this time, we are considering escalated enforcement action against the Village.

Should you have any questions, comments, or concerns, please contact Mr. Gall at (419) 373-3003 or via email at andrew.gall@epa.state.oh.us

Yours truly,



Elizabeth A. Wick, P.E.
District Engineer
Division of Surface Water

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pc: Dan Gill, DSW-CO

~~NWDO:DSW:RJE~~