



State of Ohio Environmental Protection Agency

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May 15, 2009

Huron County  
2PB00059\*ID RECEIVED

MAY 18 2009

Mayor and Council  
Village of Greenwich  
45 Main Street  
Greenwich, OH 45303

OHIO E.P.A.  
N.W.D.O.

Re: Notice of Violation – Nine Minimum Control Implementation/ Collection System Inspection

Dear Mayor and Council:

On April 22, 2009, Ohio EPA staff members Andy Gall and I met with Village Administrator Mike King to conduct an inspection of the Village of Greenwich's wastewater collection system. Specifically, the degree of implementation of the Nine Minimum Controls (NMC) for reducing combined sewer overflow (CSO) impacts and the degree of implementation of the Village's Long-Term Control Plan for eliminating CSOs were discussed. The Nine Minimum Controls are included in Part II, Item E of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 2PB00059\*ID), and the Long-Term Control Plan implementation schedule is listed in Part I, C of this same permit.

Discussion during the inspection, review of records, and review of information submitted to this office indicates that the Village continues to be in violation of permit requirements calling for implementation of the Nine Minimum Controls. As was the situation at the time of the previous inspection (April 10, 2008), the Village is not sufficiently implementing the following minimum controls: Proper operation and regular maintenance programs for the sewer system and Combined Sewer Overflows (NMC 1), Prohibition of dry weather overflows (NMC5), Public notification (NMC 8), and Monitoring to characterize CSO impacts and efficacy of controls (NMC 9). Details regarding the Village's efforts and additional measures the Village should implement for each of the Nine Minimum Controls are contained in Attachment A.

Information provided during the inspection also indicates that the Village is in violation of permit requirements calling for implementation of the Village's "Combined Sewer Collection System Long-Term Control Plan". Part I, C – Schedule of Compliance – of your NPDES permit requires submission of annual reports summarizing CSO characteristics (at a minimum, volume and occurrence), control activities that have been

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

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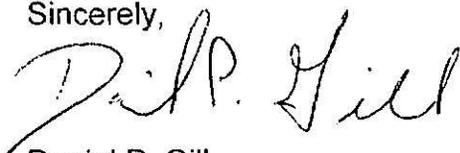
implemented, and opinions as to the impacts these projects have had on the Village's ability to close the affected CSOs (see Item A in Part I, C of your NPDES permit). Submission of the first of these annual reports was due to this office by February 1, 2009, and has still not been received as of the date of this letter. Additionally, Part I, C of your NPDES permit requires the Village to enact and enforce an ordinance by October 1, 2008 which requires adequate inspection and maintenance of septic tanks throughout the village (see Item B in Part I, C of your NPDES permit for further details on this requirement). Village staff reported that such an ordinance has not been drafted, adopted or enforced.

Finally, it was stated during the inspection that the Village is refraining from addressing private sources of Inflow and Infiltration (I/I). Again, Ohio EPA would like to highlight the importance of implementing a comprehensive program to address private sources of I/I (e.g., yard drains, foundation drains, roof leaders, leaky septic tanks, etc.) into the collection system at the same time that separation work is conducted. Performing this work simultaneously provides a higher level of confidence that separation work will be successful in allowing for the elimination of CSOs.

Note that proper implementation of the Nine Minimum Controls and the CSO Long-Term Control Plan are critical to your achieving compliance with your NPDES permit. Please provide a written response to this letter 21 days from the date of this letter detailing corrective actions to be taken by the Village. Because of the Village's failure to comply with the Nine Minimum Control and Long-Term Control Plan implementation requirements in your NPDES permit, the Village may be referred to the Director of Ohio EPA for escalated enforcement action.

If you have questions/concerns regarding this report, I can be reached by telephone at (614) 644-2118 or email at [dan.gill@epa.state.oh.us](mailto:dan.gill@epa.state.oh.us).

Sincerely,



Daniel P. Gill  
Environmental Specialist  
Division of Surface Water, Ohio EPA, Central Office

Attachments

cc: Andy Gall, DSW, NWDO  
DSW-CO File

## Attachment A

### Village of Greenwich Combined Sewer Overflow Reconnaissance Inspection

Part II, Other Requirements, Item E., in the permittee's NPDES permit (Ohio EPA No. 2PB00059), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls. Part II.B. of the National CSO Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

#### 1. Proper operation and regular maintenance programs for the sewer system and CSOs.

Village of Greenwich staff operates and maintains the WWTP and collection system. Maps of the combined and separated sewers are included in the Long-Term Control Plan (LTCP) approved by Ohio EPA on 7/10/2008. **An overall system map should be updated regularly to reflect system modifications constructed during implementation of the LTCP. The Village also needs to conduct routine inspections of:**

- CSO outfalls,
- CSO regulators, and
- Backflow prevention devices associated with the CSOs

For communities similar in size to Greenwich typical inspection frequencies are during/after wet weather events and once a week during dry weather. **Documentation of these inspections should be maintained noting responsible staff, date, time, observations and corrective actions taken/required. Village staff should also be documenting all maintenance and repair activities in a centralized log. These records will help identify problem areas that may require added attention, as well as, provide a history of the structure and operation of the collection system for future staff.**

It was stated during the inspection that Village staff do not reference the Village's 2003 Combined Sewer System Operational Plan. **The O&M measures outlined in this document should be fully implemented and periodically reviewed and revised by Village staff. Revision of this document is particularly relevant to Greenwich as significant modifications to the collection system will be constructed during implementation of the LTCP.**

#### 2. Maximum use of the collection system for storage.

All of the CSOs have fixed-weir regulators. The permittee stated that these weirs are believed to be at adequate heights as suggested by CSO responses to rainfall. It was previously reported that 1" to 1.5" of rainfall during a 24 hour period will not result in CSO activation. **As noted above in item 1, the Village should conduct regular inspections of the outfalls to determine if the reported response to rainfall is still**

accurate. Observing activations of CSOs during smaller rain events could serve as an indicator that collection lines are blocked or significant grit deposition has occurred. Three of the CSOs have backflow prevention devices (flapgates) installed on them.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.

There are two industrial users upstream of CSOs in the Village of Greenwich. The permittee reported that these industries have no temporary onsite storage that could be used to hold back flows during wet weather.

4. Maximize flow at the WWTP for treatment.

Village staff indicated that the average daily design flow for the WWTP (a continuous discharge 3-celled lagoon system) is 0.2 million gallons per day (MGD). The permittee believes that approximately 0.6 MGD could be treated without violating concentration limits in the permit, however, the WWTP is not operated at these higher flows out of concern that violations of loading limits may occur. **Effluent characteristics should be monitored and the WWTP operated such that the maximum amount of flow possible receives treatment while meeting the limits contained in your NPDES permit. Additionally, the permittee should resume monitoring and documenting influent flows. This data can prove to be very valuable when evaluating the effectiveness of Long-Term Control Plan projects – requirement of the Monitoring Minimum Control discussed in #9 below.**

5. Prohibition of CSOs during dry weather.

Village staff indicated that they are still not conducting dry weather inspections of CSOs making it impossible to determine whether dry weather overflows are occurring. **At a minimum, the CSO outfalls should be inspected on a weekly basis (regardless of the occurrence of precipitation) and during wet weather. Dry weather overflows, which are not permitted, can occur for various reasons including pipe breaks/collapses and sewer blockages. Inspecting the CSOs during dry weather will determine if dry weather overflows are occurring, and allow the Village to implement corrective measures. All dry weather overflows must be documented and reported to Ohio EPA.**

6. Control of Solid and Floatable Materials in CSOs.

The permittee cleans catch basins and collection sewer lines on an as needed basis. Additionally, each private connection to the collection system has a septic tank. Adopting an ordinance to ensure proper maintenance of these tanks is included in the Village's LTCP. **The Village is reminded that they are in violation of NPDES permit requirements calling for the adoption of a septic tank inspection and maintenance ordinance.**

7. Pollution prevention.

Village staff reported that street sweeping equipment is operated throughout the village on an annual basis.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.

The permittee is still not implementing any public notification measures. **At a minimum, signs need to be installed at each outfall, regardless of perceived accessibility, such that they are visible from all directions of approach (i.e., from land and from the receiving water). These signs should identify the outfall as a CSO, note its potential to discharge untreated sewage, and provide a Village contact phone number where additional information can be obtained. Contact this office with any questions regarding this minimum control.**

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

The permittee does not perform any of the CSO monitoring required in its NPDES permit. Instead, the permittee is reporting the "AL" code on its eDMR Forms. This code is to be used only when no discharge has occurred during a given month, whereas, the permittee indicated that overflow events likely occurred, but no inspections were conducted to determine the characteristics of these overflows. Therefore, reporting "AL" is not accurate and could be considered "false" reporting. **The Village should review the monitoring requirements contained in its permit and take immediate action to comply with these conditions. This office should be contacted with any questions.**