



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

April 21, 2008

Huron County
2PB00059*HD

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

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

Dear Mayor and Council:

On April 10, 2008, 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 and the degree of implementation of the Nine Minimum Controls (NMC) for reducing combined sewer overflow (CSO) impacts. The Nine Minimum Controls are included in Part II, Item F of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 2PB00059*HD).

Discussion during the inspection, review of records, and review of information submitted to this office indicates that the Village is in violation of permit requirements calling for implementation of the Nine Minimum Controls. Specifically, 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.

The current status of the Village's Long-Term Control Plan (LTCP) was also discussed during the inspection. The Village has submitted a LTCP recommending complete separation of all combined sewers allowing for elimination of all CSOs. Ohio EPA is currently preparing to send the LTCP out for public comment. Village staff stated that they are continuing to work toward separation with new storm sewers having been recently installed on portions of New Street, Beachwood Street, and Maple Street. 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.) at the same time separation work is conducted. Performing this work

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

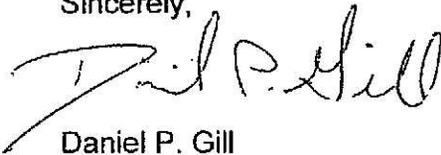
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simultaneously provides a higher level of confidence that separation work will be successful in allowing for the elimination of CSOs.

Please note that proper implementation of the Nine Minimum Controls is critical to your achieving compliance with your NPDES permit. Failure to comply with the Nine Minimum Control implementation requirements in your NPDES permit may result in enforcement actions from Ohio EPA.

Please provide a written response to this letter by May 31, 2008. 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.

Sincerely,



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

Attachments

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