

**Environmental  
Protection Agency**

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

September 15, 2011

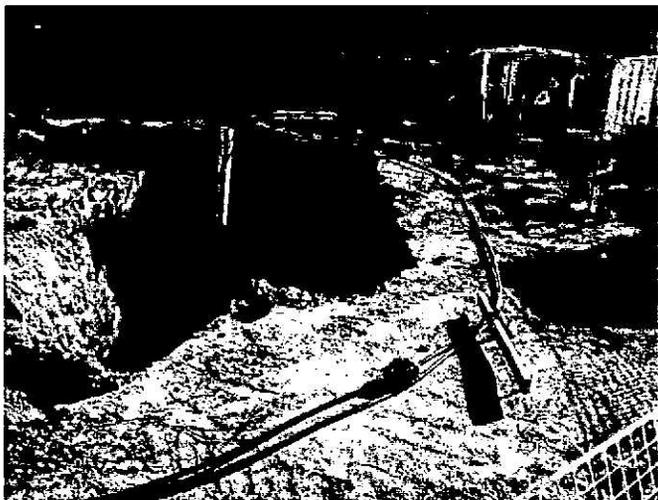
**Re:** Jackson County  
Village of Coalton WWTP  
Ohio EPA Permit No. OPA00012\*GD  
NPDES Permit No. OH0050776  
Notice of Violation(s)  
Correspondence (PWW)

Mayor and Council  
Village of Coalton  
P.O. Box 98  
Coalton, Ohio 45621

Dear Mayor and Council:

On August 18, 2011, Ohio EPA received an anonymous complaint that a fish kill had occurred in Pigeon Creek downstream of the Village of Coalton's WWTP. Tim Witham with Ohio Department of Natural Resources was able to confirm a fish kill in Pigeon Creek on the afternoon of the 18th. Trevor Irwin and I, both with Ohio EPA, met with Greg Farrar and Andy Rawlins of the Village of Coalton the following morning (8/19/11).

The Village is currently in construction of a WWTP upgrade. Greg Farrar, Operator, stated that the contractor had relocated the chemical feed lines for chlorination and dechlorination. The dechlorination feed had been interrupted while chlorination was being fed. This reportedly led to an effluent with total residual chlorine greater than 1.0mg/L. The permit limits for total residual chlorine is 0.019 mg/L. Pigeon Creek had relatively low flow during these events and the total residual chlorine in the WWTP's effluent is the probable cause of toxicity leading to the fish kill. The dechlorination was corrected for on August 18 according to the Village.



Picture to the left shows the chemical feed lines that were relocated.

**Notice of Violation(s)**

The Village is required by permit:

*Part III – GENERAL CONDITIONS*

**3. FACILITY OPERATION AND QUALITY CONTROL**

*All wastewater treatment works shall be operated in a manner consistent with the following:*

- A. *At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.*

**Notice of Violations**

We have received self-monitoring reports covering June 2010 through July 2011 for the referenced facility. Our review indicated the following violation of the conditions of your NPDES permit.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	17.	6/1/2011
001	00530	Total Suspended Solids	7D Conc	18	36.	6/1/2011
001	00530	Total Suspended Solids	30D Qty	2.27	3.31566	6/1/2011
001	00530	Total Suspended Solids	7D Qty	3.40	6.813	6/1/2011
001	00530	Total Suspended Solids	7D Qty	3.40	3.61089	6/8/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.1	6/14/2011
001	00530	Total Suspended Solids	30D Conc	12	19.5	7/1/2011
001	00530	Total Suspended Solids	30D Qty	2.27	2.94946	7/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.7	23.6666	7/1/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.5	27.	7/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.32	3.45066	7/1/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.47	2.55488	7/1/2011
001	00530	Total Suspended Solids	7D Conc	18	23.	7/15/2011
001	00530	Total Suspended Solids	7D Qty	3.40	4.52686	7/15/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.5	25.	7/15/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.47	4.9205	7/15/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	7/18/2011
001	00530	Total Suspended Solids	7D Conc	18	28.	7/22/2011
001	00530	Total Suspended Solids	7D Qty	3.40	4.2392	7/22/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.5	19.	7/22/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.47	2.8766	7/22/2011

The Operator also reported that the Contractor had transferred the sludge from the sludge holding cell to the aeration cell (biolac). This has resulted in a high concentration of solids in the mixed liquor. The project removed the polishing pond to make room for an additional aeration cell. All the solids are now subject to being washed out of the plant during wet weather inflow/infiltration. **The excess solids should immediately be pumped from the aeration cell to minimize the amount of solids subject to discharge.** The excess sludge in addition to an air line leak are both violations of:

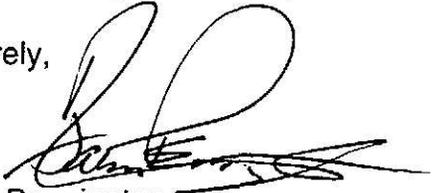
*Part III – GENERAL CONDITIONS 3. FACILITY OPERATION AND QUALITY CONTROL.*

*Failure to comply with the effluent limitations or to satisfy the conditions of your NPDES is subject to civil penalties of \$10,000 per day per violation upon enforcement action pursuant of Ohio Revised Code Chapter 6111.*

Provide written verification to Ohio EPA Southeast District office by September 30, 2011 that the items in bold above have been addressed or alternatively provide a schedule for completion of the items.

If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington  
District Representative  
Division of Surface Water

AMP/dh