



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

August 6, 2008

**Re:** Tuscarawas County  
Gnadenhutten WWTP  
Notice of Violation  
OPB00017, OH0020869  
Correspondence (PWW)

Mayor and Council  
Village of Gnadenhutten  
131 S. Walnut Street  
P.O. Box 129  
Gnadenhutten, Ohio 44629-0129

Dear Mayor and Council:

We have received your self-monitoring reports covering the months of October 2004 through June 2008 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Outfall	Date	Parameter	Reported	Units	Permit Limitation
<b>October 2005:</b>					
001	31 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
581	Monthly	Sludge Weight	None	Dry Tons	Reporting required 1/month
601	23 Days	Peak Flow Rate	None	MGD	Reporting required 1/day
<b>November 2005:</b>					
001	Week 1	Suspended Solids	1/week	mg/l	Reporting required 2/week
001	Week 1	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
581	Monthly	Sludge Weight	None	Dry Tons	Reporting required 1/month
601	Week 1	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 1	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>January 2006:</b>					
001	1/31	Precipitation	None	Inches	Reporting required 1/day
<b>February 2006:</b>					
001	27 Days	Water Temperature	None	°C	Reporting required 1/day
001	Monthly	Oil and Grease	None	mg/l	Reporting required 1/month
001	2/28	Precipitation, Total	None	Inches	Reporting required 1/day
<b>April 2006:</b>					
001	4/18	Flow Rate	AD	MGD	Reporting required 1/day
601	4/18	Peak Flow Rate	AD	MGD	Reporting required 1/day
<b>May 2006:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
601	22 Days	Peak Flow Rate	None	MGD	Reporting required 1/day

Outfall	Date	Parameter	Reported	Units	Permit Limitation
<b>June 2006:</b>					
001	28 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
601	30 Days	Peak Flow Rate	None	MGD	Reporting required 1/day
<b>July 2006:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	7/31	Flow Rate	None	MGD	Reporting required 1/day
601	31 Days	Peak Flow Rate	None	MGD	Reporting required 1/day
601	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>August 2006:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	3 Days	Flow Rate	None	MGD	Reporting required 1/day
601	15 Days	Peak Flow Rate	None	MGD	Reporting required 1/day
<b>October 2006:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	Monthly	Copper, Total Recoverable	None	ug/l	Reporting required 1/month
001	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
001	10/31	Flow Rate	None	MGD	Reporting required 1/day
601	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>November 2006:</b>					
001	Week 4	Suspended Solids	1/week	mg/l	Reporting required 2/week
001	Week 4	CBOD <sub>5</sub>	1/Week	mg/l	Reporting required 2/week
001	11/30	Flow Rate	None	MGD	Reporting required 1/day
601	Week 4	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 4	CBOD <sub>5</sub>	1/Week	mg/l	Reporting required 2/week
<b>December 2006:</b>					
001	12/31	Flow Rate	None	MGD	Reporting required 1/day
581	Monthly	Sludge Weight	None	Dry Tons	Reporting required 1/month
601	Week 4	CBOD <sub>5</sub>	1/Week	mg/l	Reporting required 2/week
<b>January 2007:</b>					
001	2 Days	CBOD <sub>5</sub>	AD	mg/l	Monitoring required 2/week
001	10 Days	Dissolved Oxygen	AD	mg/l	Monitoring required 1/day
001	2 Days	Flow Rate	AD	MGD	Monitoring required 1/day
601	2 Days	CBOD <sub>5</sub>	AD	mg/l	Monitoring required 2/week
<b>February 2007:</b>					
001	3 Days	Flow Rate	AD	MGD	Monitoring required 1/day
001	2/28	Flow Rate	None	MGD	Reporting required 1/day
<b>March 2007:</b>					
001	3/31	Flow Rate	None	MGD	Reporting required 1/day
601	3/31	Flow Rate	None	MGD	Reporting required 1/day
<b>April 2007:</b>					
001	4/30	Flow Rate	None	MGD	Reporting required 1/day
601	4/30	Flow Rate	None	MGD	Reporting required 1/day
<b>May 2007:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	7 Days	Flow Rate	None	MGD	Reporting required 1/day

Outfall	Date	Parameter	Reported	Units	Permit Limitation
<b>June 2007:</b>					
001	29 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	6/30	Flow Rate	None	MGD	Reporting required 1/day
001	6/9	pH	6.3	S.U.	6.5 Minimum
001	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>July 2007:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	7/31	Flow Rate	None	MGD	Reporting required 1/day
001	2 Days	Flow Rate	AD	MGD	Reporting required 1/day
581	Monthly	Sludge Weight	None	Dry Tons	Reporting required 1/month
601	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>August 2007:</b>					
001	30 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	Weeks 1&4	Fecal Coliform	1/week	#/100ml	Reporting required 2/week
001	3 Days	Flow Rate	AD	MGD	Reporting required 1/day
601	Week 4	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>September 2007:</b>					
001	29 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
001	7 Days	Flow Rate	AD	MGD	Reporting required 1/day
001	9/30	Flow Rate	None	MGD	Reporting required 1/day
001	Week 4	Fecal Coliform	1/week	#/100ml	Reporting required 2/week
601	Week 4	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>October 2007:</b>					
001	31 Days	Chlorine Residual	None	mg/l	Reporting required 1/day
<b>November 2007:</b>					
601	Week 1	CBOD <sub>5</sub>	1/week	mg/l	Reporting required 2/week
<b>December 2007:</b>					
601	23 Days	Peak Flow Rate	None	MGD	Reporting required 1/day
<b>May 2008:</b>					
001	Week 1	Fecal Coliform	1/week	#/100ml	Reporting required 2/week
<b>June 2008:</b>					
001	Weeks 3-4	Fecal Coliform	1/week	#/100ml	Reporting required 2/week

It appears several of these violations may not exist since the appropriate "AH" or "AN" codes may not have been used. I strongly urge the village to reevaluate their data and update as necessary. Failure to address the aforementioned violations may be cause for enforcement action and monetary penalties.

Please inform this office in writing within **thirty** days of receipt of this notification as to the reasons for the aforementioned violations, as well as a description of actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed for completion of the actions.

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "*Facility Pollution Prevention Guide*" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

If there are any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte  
Chemical Engineer - Environmental Specialist II  
Division of Surface Water

JMW/dh

c: Mr. Mike Heil, Operator, Village of Gnadenhutzen