



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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

August 13, 2008

Re: Tuscarawas County
Village of Strasburg WWTP
Notice of Violation
OPB00043, OH0027553
Correspondence (PWW)

Mayor and Council
Village of Strasburg
358 5th Street
Strasburg, Ohio 44680

Dear Mayor and Council:

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

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u>	<u>Units</u>	<u>Permit Limitation</u>
June 2004:					
581	Weeks 1, 2 & 4	Percent Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2, & 4	Percent Solids	None	% Volatile	Reporting required 1/week
July 2004:					
001	7/31	Flow Rate	None	MGD	Reporting required 1/day
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
August 2004:					
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
September 2004:					
001	Weeks 1&4	Ammonia	1/week	mg/l	Reporting required 2/week
001	Week 3	Fecal Coliform	AK	#/100ml	2000
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
October 2004:					
001	Week 2	Ammonia	1/week	mg/l	Reporting required 2/week
581	Weeks 1-2	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-2	Sludge Solids	None	% Volatile	Reporting required 1/week
November 2004:					
581	Weeks 1, 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
December 2004:					
001	Weeks 1&3	Ammonia	1/week	mg/l	Reporting required 2/week
581	Weeks 1-3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-3	Sludge Solids	None	% Volatile	Reporting required 1/week

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u>	<u>Units</u>	<u>Permit Limitation</u>
January 2005:					
581	Weeks 2-3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-3	Sludge Solids	None	% Volatile	Reporting required 1/week
February 2005:					
581	Weeks 1, 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
March 2005:					
581	Weeks 1, 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
April 2005:					
001	Week 2	Ammonia	1/week	mg/l	Reporting required 2/week
001	Week 2	CBOD ₅	1/week	mg/l	Reporting required 2/week
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
601	Week 2	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 2	CBOD ₅	1/week	mg/l	Reporting required 2/week
May 2005:					
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
June 2005:					
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Week 3	Sludge Weight	None	Dry Tons	Reporting required 1/week
July 2005:					
001	Week 2	Fecal Coliform	AK	#/100ml	2000
001	Week 4	Suspended Solids	1/week	mg/l	Reporting required 2/week
001	Week 4	CBOD ₅	1/week	mg/l	Reporting required 2/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
601	Week 4	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 4	CBOD ₅	1/week	mg/l	Reporting required 2/week
August 2005:					
581	Weeks 1 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Quarterly	pH	None	S.U.	Reporting required 1/quarter
September 2005:					
581	Weeks 1, 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
601	Week 3	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 3	CBOD ₅	1/week	mg/l	Reporting required 2/week
October 2005:					
001	Week 4	Fecal Coliform	AK	#/100ml	2000
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
November 2005:					
001	Week 4	Ammonia	1/week	mg/l	Reporting required 2/week
581	Weeks 1-3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-3	Sludge Solids	None	% Volatile	Reporting required 1/week
December 2005:					
001	Week 3	Ammonia	1/week	mg/l	Reporting required 2/week
001	Week 3	Suspended Solids	1/week	mg/l	Reporting required 2/week
001	Week 3	CBOD ₅	1/week	mg/l	Reporting required 2/week
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u>	<u>Units</u>	<u>Permit Limitation</u>
581	Weeks 2-4	Sludge Weight	None	Dry Tons	Reporting required 1/week
601	Week 3	Suspended Solids	1/week	mg/l	Reporting required 2/week
601	Week 3	CBOD ₅	1/week	mg/l	Reporting required 2/week
January 2006:					
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2-4	Sludge Weight	None	Dry Tons	Reporting required 1/week
February 2006:					
581	Weeks 1 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
March 2006:					
581	Weeks 1-3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-3	Sludge Solids	None	% Volatile	Reporting required 1/week
April 2006:					
001	Week 1	Ammonia	1/week	mg/l	Reporting required 2/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 1 & 3	Sludge Weight	None	Dry Tons	Reporting required 1/week
May 2006:					
001	5/31	Dissolved Oxygen	None	mg/l	Reporting required 1/day
581	Week 1	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-2	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Week 1	Sludge Weight	None	Dry Tons	Reporting required 1/week
June 2006:					
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2-4	Sludge Weight	None	Dry Tons	Reporting required 1/week
July 2006:					
001	Week 1	Fecal Coliform	AK	#/100ml	2000
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Weight	None	Dry Tons	Reporting required 1/week
August 2006:					
001	Week 3	Fecal Coliform	1/week	#/100ml	Reporting required 2/week
001	Week 3	Ammonia	1/week	mg/l	Reporting required 2/week
581	Weeks 1 & 3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1 & 3	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Week 1	Sludge Weight	None	Dry Tons	Reporting required 1/week
September 2006:					
581	Weeks 2 & 3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1- 3	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2-4	Sludge Weight	None	Dry Tons	Reporting required 1/week
October 2006:					
581	Weeks 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2 & 4	Sludge Weight	None	Dry Tons	Reporting required 1/week
November 2006:					
001	Weeks 1-4	CBOD ₅	60-145	kg/day	38
001	Average	CBOD ₅	110	kg/day	26
001	Average	CBOD ₅	90	mg/l	20
001	Weeks 1-4	CBOD ₅	51-123	mg/l	30
001	Weeks 2 & 4	Ammonia	1/week	mg/l	Reporting required 2/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week

<u>Outfall</u>	<u>Date</u>	<u>Parameter</u>	<u>Reported</u>	<u>Units</u>	<u>Permit Limitation</u>
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2 & 4	Sludge Weight	None	Dry Tons	Reporting required 1/week
December 2006:					
581	Weeks 2-3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-3	Sludge Solids	None	% Volatile	Reporting required 1/week
January 2007:					
001	1/31	Dissolved Oxygen	5.0	mg/l	6.0 Minimum
581	Weeks 1-2	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-2	Sludge Solids	None	% Volatile	Reporting required 1/week
February 2007:					
581	Weeks 1-3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-3	Sludge Solids	None	% Volatile	Reporting required 1/week
March 2007:					
581	Weeks 2-4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2-4	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2-4	Sludge Weight	None	Dry Tons	Reporting required 1/week
April 2007:					
001	Average	Suspended Solids	268	kg/day	31
001	Average	Suspended Solids	201	mg/l	24
001	Weeks 3 & 4	Suspended Solids	457-591	kg/day	46
001	Weeks 3 & 4	Suspended Solids	309-476	mg/l	36
581	Weeks 1, 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
May 2007:					
581	Weeks 1, 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
June 2007:					
581	Weeks 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
July 2007:					
001	Week 1	Fecal Coliform	AK	#/100ml	2000
581	Weeks 3 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 3 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
August 2007:					
001	Week 2	Fecal Coliform	6600	#/100ml	2000
001	Week 2	Fecal Coliform	1/week	#/100ml	Reporting required 2/week
581	Weeks 1 & 3	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1-3	Sludge Solids	None	% Volatile	Reporting required 1/week
581	Weeks 2 & 3	Sludge Weight	None	Dry Tons	Reporting required 1/week
September 2007:					
001	Week 3	Fecal Coliform	1/week	#/100ml	Reporting required 2/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 1, 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week
January 2008:					
001	1/7	Flow Rate	AD	MGD	Reporting required 1/day
March 2008:					
001	Average	Suspended Solids	33	kg/day	31
581	Weeks 2 & 4	Sludge Solids	None	% Total	Reporting required 1/week
581	Weeks 2 & 4	Sludge Solids	None	% Volatile	Reporting required 1/week

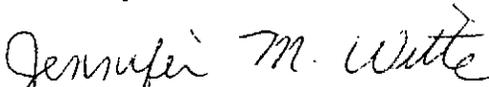
It appears several of these violations may not exist since the appropriate "AH" or "AN" codes may not have been used. I strongly urge the village to reevaluate their data and update as necessary.

Please inform this office in writing within **ten** days of receipt of this notification as to the reasons for the above referenced 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.

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. Ronald Lambert, Superintendent, Strasburg WWTP