



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 Korteski, Director

January 25, 2008

Re: Tuscarawas County
Twin City WWTP
Notice of Violation
Correspondence (PWW)

Mr. John O'Hara, President of the Board
Twin City Water & Sewer District
308 Grant Street
Dennison, Ohio 44621

Dear Mr. O'Hara:

Your National Pollutant Discharge Elimination System (NPDES) permit 0PD00015*JD for the Twin City Water & Sewer District wastewater treatment plant, which became effective on August 1, 2007, included a Schedule of Compliance. A review of this compliance schedule reveals the sewer district has failed to comply with the following milestones:

1. The permittee shall develop a detailed written work plan to investigate, identify and locate sources of inflow/infiltration (I/I) entering into the North End of Dennison (north of Welch Street between Hannah Street and 6th Street) area separate sanitary sewer system. The work plan should include information on dye testing, smoke testing, sewer televising, sewer cleaning, flow monitoring, precipitation monitoring, stream flow monitoring. The work plan shall be submitted to the Ohio EPA Southeast District Office for review no later than December 1, 2007.
2. The permittee shall complete investigation of the separate sanitary sewer system in the Thornwood Park area as outlined in the written work plan no later December 1, 2007.

In our June 26, 2007 meeting, we discussed the investigation of the Thornwood Park area. At the time of the meeting, we were informed investigation of this area would be completed shortly. On December 14, 2007, I received a letter stating smoke testing had been completed in this area, and dye testing was underway. The letter further stated due to many conditions, work on the Thornwood Park area will take longer than expected. We expect the work in this area to be completed without any further delay.

On September 28, 2007, I received the sewer district's work plan for the downtown Dennison area. A review of this document appears to indicate compliance with the permit.

Future compliance milestones are listed below:

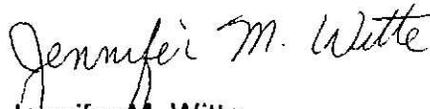
1. The permittee shall develop a detailed written work plan to investigate, identify and locate sources of inflow/infiltration (I/I) entering into the South Side of Dennison (bordered by Bank Street to the north, Race Street to the south, and the Little Stillwater Creek to the east and west) area separate sanitary sewer system. The work plan should include information on dye testing, smoke testing, sewer televising, sewer cleaning, flow monitoring, precipitation monitoring, stream flow monitoring. The work plan shall be submitted to the Ohio EPA Southeast District Office for review no later than February 1, 2008.
2. The permittee shall evaluate the information collected during the investigation of the separate sanitary sewer system in the Thornwood Park area. After reviewing the collected information, the permittee shall prepare and submit a detailed written report summarizing the defects, cross connections, etc. and a plan of action to resolve the issues located in the separate sanitary sewer system in the Thornwood Park area to the Southeast District office of Ohio EPA no later than March 1, 2008.
3. The permittee shall submit a status report on the initiation of the investigation of the separate sanitary sewer system on the South Side of Dennison (bordered by Bank Street to the north, Race Street to the south, and the Little Stillwater Creek to the east and west) to the Ohio EPA Southeast District Office no later than March 1, 2008.
4. The permittee shall develop a detailed written work plan to investigate, identify and locate sources of inflow/infiltration (I/I) entering the West Side of Uhrichsville (Newport Ave/Holiday Ave to the south, County Road 28 to the west, the Ohio Central Railroad tracks to the north, and Stillwater Creek to the east). The work plan should include information on dye testing, smoke testing, sewer televising, sewer cleaning, flow monitoring, precipitation monitoring, stream flow monitoring. The work plan shall be submitted to the Ohio EPA Southeast District Office for review no later than April 1, 2008.
5. The permittee shall complete investigation of the separate sanitary sewer system in the Downtown area (between Welch Street and Center Street from Hannah Street to State Route 800) as outlined in the written work plan no later than June 1, 2008.

6. The permittee shall develop a detailed written work plan to investigate, identify and locate sources of inflow/infiltration (I/I) entering the Downtown/East Side area of Uhrichsville (located east of Water Street and south of US 36/250) separate sanitary sewer system. The work plan should include information on dye testing, smoke testing, sewer televising, sewer cleaning, flow monitoring, precipitation monitoring, stream flow monitoring. The work plan shall be submitted to the Ohio EPA Southeast District Office for review no later than June 1, 2008.

I am very concerned with the sewer district's failure to comply with the aforementioned milestones in the Schedule of Compliance in the NPDES permit. Within 14 days upon receipt of this letter, the sewer district must provide this office with the information required by Part III, Section 12(D) of the NPDES permit.

If you should have 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: Jessica Atleson, AGO
- c: John Rypien, Superintendent, Twin City Water & Sewer District
- c: Donnie Fawcett, Assistant Superintendent, Twin City Water & Sewer District