

Miami Chy



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

July 15, 2013

Mayor and Council
Village of Covington
1 South High Street
Covington, Ohio 45318

**RE: NOTICE OF VIOLATION
Reconnaissance Inspection (RI)
Village of Covington Wastewater Treatment Plant
NPDES Permit 1PB00013*HD/OH0020761**

Mayor and Council:

On June 27, 2013, I conducted a Reconnaissance Inspection (RI) of the wastewater treatment plant (WWTP). The focus of this inspection was the primary outfall (1PB00013001) discharging to the Stillwater River. Mr. Mike Busse joined me during an inspection of this outfall. On June 25, 2013, Water Quality Personnel from the Ohio EPA's Division of Surface Water reported the presence of solids immediately downstream of the primary outfall. At the time of my inspection, solids were noted as being present in an area that was immediately downstream of the outfall. Also, larger masses of solids were noted downstream of the clarifiers and within the chlorine contact tank. Solids exiting a treatment facility are a violation of Item 2 in the Part III General Conditions of the facility's National Pollutant Discharge Elimination System (NPDES) discharge permit. The practice of washing out solids to the Stillwater River is unacceptable. This has been noted in a previous inspection. Effluent was rated as "Unsatisfactory."

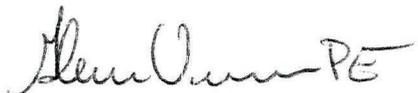
An inspection conducted in December 2009 discussed a previous alleged incident of sludge discharge from the outfall that was attributed to the sludge accumulation in the chlorine contact tank. Rising sludge in the chlorine contact tank was also observed at that time. A Standard Operating Procedure (SOP) for cleaning the chlorine contact tank was provided as part of the response to the 2009 inspection received by the Ohio Environmental Protection Agency (Ohio EPA) on January 20, 2010, (See attached). This issue appears to be a recurrent item with the WWTP. The WWTP Operator of Record shall ensure that the SOP is being followed to avoid any action against the

Mayor and Council
Village of Covington
July 15, 2013
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operator's license. If the SOP is found to be deficient in any way, it shall be revised and submitted to Ohio EPA.

A response is required to this Notice of Violation. This response is to be received by August 14, 2013. The response shall include a review of the 2010 SOP (attached) and any completed revisions that were identified during the review process. Any revision of this SOP shall identify and sufficiently address identified deficiencies such that the discharge of solids is eliminated. Other actions that will eliminate the discharge of solids from the outfall are also to be included. If you should have any questions, I ask that you please write me at glen.vonderembse@epa.ohio.gov or call me at (937) 285-6033.

Sincerely,



Glen Vonderembse, PE
Environmental Engineer
Division of Surface Water

Enclosures: June 27, 2013, Reconnaissance Inspection Report
Village of Covington WWTP Standard Operating Procedure for Cleaning
Chlorine Contact Tanks (January, 2010)

cc: Mike Busse, Village Administrator
Ralph (Butch) Boehringer, Village of Covington

GV\bp



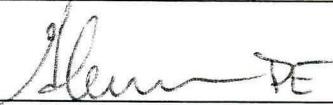
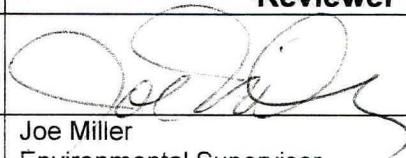
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PB00013*HD	OH0020761	6/27/2013	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Covington Wastewater Treatment Works 200 Bridge Street Covington, OH 45318	1:45 p.m.	July 1, 2011
	Exit Time	Permit Expiration Date
	2:15 p.m.	June 30, 2016
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Mr. Mike Busse, Village Administrator		---
Name, Address and Title of Responsible Official		Phone Number
Mayor and Council Village of Covington 1 South High Street Covington, OH 45318		(937) 473-3420

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
N	Permit	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	N	Compliance Schedule
N	Operations & Maintenance	U	Effluent/Receiving Waters	N	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Please see attached.	
Inspector	Reviewer
 Date: 7/15/2013	 Date: 7/15/13
Glen Vonderembse, PE Environmental Engineer Division of Surface Water Southwest District Office	Joe Miller Environmental Supervisor Division of Surface Water Southwest District Office

Village of Covington Wastewater Treatment Works
Permit #: 1PB00013*HD
NPDES#: OH0020761

The receiving waters, Stillwater River, were inspected in response to observations by the personnel of the Division of Surface Water's Water Quality Group. Leslie Williams and Greg Buthker observed solids within the Stillwater River. Please see Photo #1 below. On June 27, 2013, I inspected the primary outfall, 1PB00013001 (the outfall). Mr. Mike Busse, Village Administrator, was also present during this the inspection of the outfall. At the time of inspection, the presence of the solids was noted immediately downstream of the outfall. These solids had a very dark appearance and overlaid the sand and gravel riverbed. Also noted were some larger masses of solids floating in the chlorination unit operation basin. It appeared that these solids originated from the clarifier operations as a result of washing the clarifier troughs.



Photo #1 – Immediately Downstream of Outfall 001. The solids are noted at the left of photo and appear charcoal black.

RECEIVED
OHIO EPA

JAN 20 2010

Southwest District

JOE,

I'VE COMPLETED THE TWO PARTS OF YOUR INSPECTION THAT I COULD, THE SOP FOR CLEANING THE CHLORINE CONTACT TANKS AND THE ORC FORM. THE OTHER THREE PARTS THE BOARD HAS HIRED FANNING AND HOWEY TO COMPLETE. WE HAVE A MEETING WITH JILL ON THE 13TH OF JANUARY.

THANKS, BUTCH BOEHRINGER
VILLAGE OF COVINGTON

VILLAGE OF COVINGTON WASTEWATER PLANT
SOP FOR CLEANING CHLORINE CONTACT TANKS

THE CHLORINE CONTACT TANKS WILL BE CLEANED TWICE A YEAR
BEFORE CHLORINATION IN APRIL AND AFTER CHLORINATION IN
NOVEMBER.

PROCEDURE TO CLEAN TANKS

PULL GATES TO BYPASS FLOW TO CHLORINE CONTACT TANKS-INSTALL
GATES TO ISOLATE TANKS-HOOK UP PUMP TO PVC SUCTION LINE-RUN
DISCHARGE LINE TO TRICKLING FILTER TANKS-AFTER PUMPING DOWN
TANKS USE PRESSURE WASHER TO CLEAN SIDES OF TANKS-RE-INSTALL
GATES TO ORIGINAL LOCATIONS



Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: Village of Covington WWTP Phone Number: (937) 473-2104
 PWS ID/NPDES Permit #: IPB00013 STU # _____ Classification: 2
Village of Covington
 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System
		X	

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*
N	<u>Ralph Boehringer</u>	<u>ww3-1014684-97</u>	<u>Ralph Boehringer</u>

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: 4 + hrs

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	