



**Environmental
Protection Agency**

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

March 21, 2012

RE: JEFFERSON VILLAGE WWTP
JEFFERSON VILLAGE, ASHTABULA CO.
OHIO EPA PERMIT 3PC00021
COMPLIANCE EVALUATION INSPECTION

Mr. Terry Finger, Village Administrator
Village of Jefferson
98 East Jefferson Street
Jefferson, OH 44047

Dear Mr. Finger:

On March 19, 2012, a site inspection was conducted at the above referenced facility at 225 North Elm Street, Jefferson Village. The inspection was conducted by John Schmidt of this office. Mr. Gary Licate, plant superintendent, represented the Village of Jefferson on the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on March 10, 2011.

The Village of Jefferson collection system consists of two influent lines, one a gravity line serving the western side of town, and the other from the Elm Street pump station serving the east side of town. Both lines meet at a manhole that the plant headworks. The system consists of screening and grit removal, parshall flume, lift station, comminutor, equalization basin, primary clarifiers, aeration tanks, division well, clarification, rapid sand filtration, UV disinfection, and post disinfection aeration. Ferric chloride is fed for phosphate control. Sludge management consists of aerobic digestion and settling tanks, dewatering with a belt filter press, with sludge land applied to a local farmer's field as Class B sludge. The facility discharges to Cemetery Creek adjacent to the south side of the facility. Generators provide backup power to the entire facility.

Observations and Notations

Following are observations and notations made during the inspection:

1. Jefferson maintains sheets for recording internal process control data and data reporting as prescribed by the NPDES permit, but does not maintain a bound facility log book or computer program to document plant operations, equipment inspection and maintenance, and to document maintaining minimum staffing requirements as required by Ohio Administrative Code (OAC) rule 3745-7-09.

2. Ohio EPA notes that Mr. Licate is a Class III wastewater operator, while remaining wastewater treatment plant (WWTP) staff are Class I operators. In the event that Mr. Licate is away from the WWTP or collection system, there is no Class III or Class II operator in responsible charge of the facility as prescribed by your NPDES permit.
3. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Screenings and grit was containerized for disposal at a solid waste landfill.
4. The influent sampler is maintained at the proper temperature and collects a flow proportional sample.
5. The surfaces of the primary clarifiers were clear. The effluent trough was clean and there was no scum around the effluent baffles or the troughs. Weirs and effluent channels are scrubbed weekly.
6. The content of the aeration tank had good color and mixing. Sludge returns were a chocolate brown color, with minimal foaming.
7. The surfaces of the secondary clarifiers were clear. The effluent trough was clean and there was no scum around the effluent baffles or the troughs. Weirs and effluent channels are scrubbed weekly.
8. The rapid sand filters were in satisfactory operation. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
9. Disinfection is provided by chlorine gas in 150 lb cylinders.
10. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample.
11. The final effluent was clear and was mixing well with the receiving stream.
12. The WWTP laboratory performs monitoring of CBOD, suspended solids, pH, temperature, dissolved oxygen, bacteria (E. Coli and Fecal Coliform), phosphorus, chlorine, and ammonia nitrogen. Jefferson Village contracts with Northcoast Environmental of Streetsboro for metals, oil and grease, nitrate-nitrite, low level mercury, and quality assurance samples from the WWTP laboratory.
13. Jefferson receives timely industrial pretreatment data from Worthington Cylinders. Jefferson has noted no collection system of WWTP issues with the discharge from Worthington Cylinders.
14. A storm water pollution prevention plan (SWPPP) has not been prepared for this facility.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2011 through February 1, 2012 indicates the following apparent noncompliance of the terms and conditions of your NPDES permit.

Limit Violations

The following limit violations were noted for the time period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01119	Copper, Total Recoverable	30D Conc	20	25.	8/1/2011

Ohio EPA received a response to the violation from the Village of Jefferson on September 27, 2011. No additional information is needed to respond to the violation.

Reporting Violations

No reporting violations were noted for the time period reviewed.

Other Violations

The following additional violations of your NPDES permit are noted:

1. **Backup Operator of Record**: As required by Part II, Item A of your permit, the facility must have a Class III Operator in responsible charge. Part II, Item A(2)(e) contains provisions for a Class II operator as a backup operator for up to 30 consecutive days a year that Mr. Licate could be away from the WWTP for vacations, trainings, meetings, etc. Currently, Jefferson has no provisions for a backup operator in the event that Mr. Licate is away from his duties. Jefferson must make provisions for a Class II Operator to operate the WWTP in any absence of your primary operator.
2. **Storm Water Pollution Prevention Plan**: Part IV of your NPDES permit requires Jefferson to prepare a SWPPP for the Jefferson WWTP. Ohio EPA maintains a sample template for a SWPPP in word format online at:
http://epa.ohio.gov/portals/35/permits/IndustrialStormWater_SampleSWP3Template.doc.

Additional information on the storm water program may be found online at:

http://www.epa.ohio.gov/dsw/storm/industrial_index.aspx and <http://cfpub1.epa.gov/npdes/stormwater/swcats.cfm>.

3. **Facility Log Book**: Jefferson is not maintaining a facility log book to document facility operations as required by OAC 3745-7-09. This bound, pre-numbered log book must document that minimum staffing times are being met, dates and times of arrival and departure for the operator of record (ORC) and any other operator, specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced; results of tests performed and

samples taken, unless documented on a laboratory sheet; performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and identification of the persons making entries.

Compliance Schedule

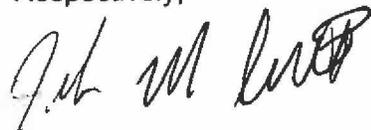
Your new NPDES permit, effective October 1, 2010 and modified as of July 1, 2011, contains the following milestones:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
9/2/2010	10/01/2015	10/2/2011	11/10/2011	95999	Other	E. Coli Status Report
9/2/2010	10/01/2015	10/2/2011	11/10/2011	-----	Other	Submit PTI if Needed
9/2/2010	10/01/2015	10/2/2011	11/10/2011	95999	Other	E. Coli Status Report
9/2/2010	10/01/2015	3/02/2012	11/10/2012	05699	Other	Achieve Final Limits

Although some of the milestones were not met on a timely basis, they were met. No additional information is needed concerning the compliance milestones.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

File: Municipal/Jefferson Village WWTP (Ashtabula Co.)/PC