



**Environmental
Protection Agency**

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

April 4, 2012

RE: ANDOVER WASTEWATER TREATMENT PLANT
NPDES PERMIT NO. 3PB00000*GD
ANDOVER VILLAGE, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Joseph DiBell, Village Administrator
Village of Andover
P.O. Box 1267
134 Maple Street
Andover, OH 44003

NOTICE OF VIOLATION

Dear Mr. DiBell:

On April 3, 2012, a site inspection was conducted at the above referenced facility at 500 Russtik Drive Extension, Village of Andover, Ashtabula County. The inspection was conducted by John Schmidt of this office. You and Richard Mead, Plant Superintendent, represented the Village of Andover (Andover). 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 April 14, 2011.

The system consists of screening, influent monitoring, wet well lift station, alum addition, diversion chamber with bar screen and oil and grease removal, fine bubble aeration, clarification, sand filtration, chlorination, post disinfection aeration, and dechlorination. Plant bypasses, when they occur, consist of screening, diversion to an aerated equalization basin prior to mixing with the plant effluent at the chlorine contact tank. Lime and caustic are available for pH adjustment if needed. Sludge management consists of aerobic digestion, dewatering with a belt filter press, with sludge land applied. Decant waters from the sludge process go through a sand filter prior to being returned to the headworks of the plant. The facility discharges to Wade Creek northeast of the facility. A 175 KW generator provides backup power for the entire facility.

Observations and Notations

Following are observations made during the inspection:

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained. Screenings and grit was containerized for disposal at a solid waste landfill.
2. The plant is operated by Richard Mead, who also operates the Andover Water Treatment Plant on behalf of the Village of Andover.
3. Log books were examined and found not maintained in accordance with Ohio Administrative Code (OAC) 3745-7-09. Information was maintained at the plant, but not contained in a bound, numbered log book as required by rule.

4. The EQ basin was found empty. Andover modified its procedures of when to divert flows to the EQ basin, resulting in fewer bypasses on the plant. Wastewater is now not diverted to the EQ basin until influent flows reach 0.75 to 1.1 MGD. Previously flows were diverted when flows exceeded 0.5 MGD. This has significantly reduced the frequency of bypass events.
5. The influent sampler is maintained at the proper temperature and collects a flow proportional sample. The sampler was converted from time proportional to flow proportional in April 2011.
6. Aeration blowers were found in operating condition. Aeration tanks were a medium brown color with good mixing, and an earthy odor. Air was even across the tanks. The return sludge lines were operating at the time of the inspection. Effluent weirs and outlet channels are scrubbed weekly.
7. Clarifier effluent channels were reasonably clean. Scum was accumulating in areas as designed. The effluent trough was reasonably clean and there was no scum around the effluent baffle or the trough.
8. The sand filter was found in operating condition. Some floating debris was noted on the surface of the water, and is skimmed off using a pool skimmer. Wastewater was observed percolating freely through the sand indicating that the beds were not clogged.
9. Aerobic digesters were found in proper operating condition. Sludge processing areas were inspected but were not operating at the time of the inspection.
10. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample. The sampler was converted from time proportional to flow proportional in April 2011.
11. The final discharge at Wade Creek was observed as acceptable visual quality. The upstream sample point was noted at the access road bridge over Wade Creek about 150 yards upstream and the downstream monitoring point about 100 yards downstream.
12. The wastewater treatment plant (WWTP) laboratory performs monitoring of Biochemical Oxygen Demand (BOD), suspended solids, pH, temperature, dissolved oxygen, and chlorine. Andover Village contracts with Microbac Laboratories of Meadville, PA for metals, oil and grease, nitrate-nitrite, low-level mercury, bacteria (E. Coli and Fecal Coliform), phosphorus, ammonia-nitrogen, and quality assurance samples from the WWTP laboratory. Microbac Laboratories and the Village of Andover both submit the data to Ohio EPA's electronic discharge monitoring report (eDMR) system for the Village of Andover.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2011 through March 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day	30D Qty	22.8	35.2027	3/1/2011
001	80082	CBOD 5 day	7D Qty	34.1	37.3719	3/1/2011
001	80082	CBOD 5 day	7D Qty	34.1	53.3043	3/8/2011
001	80082	CBOD 5 day	7D Qty	34.1	46.8885	3/22/2011
001	80082	CBOD 5 day	30D Conc	12	12.45	4/1/2011
001	80082	CBOD 5 day	30D Qty	22.8	28.2089	4/1/2011
001	80082	CBOD 5 day	7D Qty	34.1	43.2636	4/1/2011
001	00530	Total Suspended Solids	7D Qty	34.1	44.1709	5/1/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	3.41	3.68091	5/1/2011
001	80082	CBOD 5 day	30D Qty	11.4	29.8008	5/1/2011
001	80082	CBOD 5 day	7D Qty	17.1	78.4781	5/1/2011
001	80082	CBOD 5 day	7D Qty	17.1	19.3892	5/22/2011

The Village of Andover notified Ohio EPA of these violations in electronic messages dated March 1, 2011, March 9, 2011, April 26, 2011, May 6, 2011, and May 20, 2011. These violations are due to heavy rains exceeding the capacity of the treatment plant, resulting in partial bypasses. No additional information is needed at this time to respond to the violations.

Reporting Violations

No reporting code violations were noted for the period reviewed. The following reporting frequency violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	80082	CBOD 5 day	2/Week	2	1	03/22/2011
001	31616	Fecal Coliform	2/Week	2	1	09/08/2011
001	00610	Nitrogen, Ammonia (NH3)	2/Week	2	1	03/22/2011
001	31648	E. coli	2/Week	2	1	09/08/2011
001	00610	Nitrogen, Ammonia (NH3)	2/Week	2	1	07/01/2011

During the site visit, Mr. Mead indicated that this may be due to the last day of the month falling in the middle of the week. Andover has historically collected samples twice weekly, with samples collected by your contract laboratory on Wednesdays and Fridays. Part II, Item 1 of your NPDES permit recognizes Week 1 as Day 1-7, Week 2 as Day 8-14, Week 3 as Day 15-21, and Week 4 as Day 22-28. If samples are to be collected twice weekly, then two samples must be collected during each prescribed set of days. Please note that Ohio EPA expects schedules to be adjusted over holiday periods to ensure that the parameters are collected at the frequencies as prescribed by your NPDES permit. Mr. Mead will be following up with Microbac to ensure that samples are collected as prescribed in your NPDES permit.

Compliance Schedule

Your NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
11/01/2010	10/31/2015	11/01/2010	04/12/2010	-----	Other	Cont. I/I elimination
11/01/2010	10/31/2015	11/01/2011	Modified	01299	Other	PTI for EQ Basin
11/01/2010	10/31/2015	05/01/2012	Modified	03099	Other	Start EQ construction
11/01/2010	10/31/2015	11/01/2013	Modified	04599	Other	Complete construction
11/01/2010	10/31/2015	07/01/2011	11/3/2011	95999	Other	E Coli Status Report
11/01/2010	10/31/2015	09/01/2011	N/A	-----	Other	PTI for E Coli if Needed
11/01/2010	10/31/2015	11/01/2011	11/01/2011	05699	Other	Achieve E Coli Limits
11/01/2010	10/31/2015	11/01/2011	11/03/2011	-----	Other	Mercury (Hg) Evaluation
11/01/2010	10/31/2015	11/01/2011	N/A	-----	Other	Hg PTI Mod if Needed
11/01/2010	10/31/2015	11/01/2011	N/A	-----	Other	Hg Variance if Needed
03/01/2012	10/31/2015	06/01/2012	Incomplete	01299	Other	PTI for EQ Basin
03/01/2012	10/31/2015	09/01/2012	Incomplete	03099	Other	Start EQ construction
03/01/2012	10/31/2015	06/01/2013	Incomplete	04599	Other	Complete construction

Ohio EPA acknowledges that Andover is following the recommendations made by Smolen Engineering in its August 31, 2005 report, including relining sewers on West Main Street, requiring roof drain tie-ins to disconnect from the sanitary sewer system, and envisioned relining of sewers on East and West Main Streets in 2012. Please note that the milestone to submit a Permit-to-install (PTI) for expansion of the flow equalization tank is due June 1, 2012. If Andover wishes to discuss the milestones with Ohio EPA a meeting is recommended no later than 30 days prior to the due date of this milestone to give your consultant ample time to complete and submit a PTI on our behalf.

Other NPDES Violations

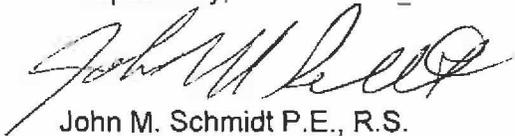
1. Sample Frequency: Part II, Item 1 of your NPDES permit recognizes Week 1 as Day 1-7, Week 2 as Day 8-14, Week 3 as Day 15-21, and Week 4 as Day 22-28. If samples are to be collected twice weekly, then two samples must be collected during each prescribed set of days. Please note that Ohio EPA expects schedules to be adjusted over holiday periods to ensure that the parameters are collected at the frequencies as prescribed by your NPDES permit.
2. 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 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. Per my discussions with Mr. Mead, a log book had been maintained at this facility by the previous superintendent, and the log book will immediately be reinstated and maintained per OAC 3745-7-09.

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Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

cc: Richard Mead, WWTP Superintendent, Village of Andover

File: Public WW/Andover Village WWTP/PC