



**Environmental
Protection Agency**

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

July 12, 2012

Jacob Nihiser, Mayor
Sugar Grove WWTP
101 Bridge Street
Sugar Grove, OH 43155

**Re: Sugar Grove WWTP
NPDES Permit 4PA00001/ OH0020401
Compliance Evaluation Inspection
Fairfield County
Notice of Violation**

Dear Mr. Nihiser:

On July 6, 2012, a Compliance Evaluation Inspection was conducted at the Sugar Grove WWTP. Present for the inspection were you and Lowell Clugston representing the Village of Sugar Grove and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The following items were discussed during the inspection:

- Effluent violations continue to be problematic at the facility (see attached report). Violations of suspended solids can be curtailed with the rehabilitation and use of the upflow clarifiers. Violations of bacteria limits can be addressed by upgrading the disinfection system. The obvious conclusion is that compliance with permit limits by the Village is inextricably tied to addressing the compliance schedule in the permit (see below).
- The Village has violated the terms of the compliance schedule in the NPDES permit. The Village shall submit the report cited in Part 1-C, 1b of the NPDES permit to Paul Vandermeer by no later than August 31, 2012. The remaining portions of the schedule shall be adhered to as expeditiously as possible.
- See additional specific comments in the inspection report.

Jacob Nihiser, Mayor
Sugar Grove WWTP
Page -2-

If you have any questions or comments concerning the enclosed **Notice of Violation**, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely

A handwritten signature in black ink, appearing to read "Paul Vandermeer", with a long horizontal flourish extending to the right.

Paul L. Vandermeer
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Paul Vandermeer

PV/nsm Sugar Grove

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PA00001	OH0020401	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
7/6/2012	9:00 AM	10:10 AM	Yes	Yes

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Sugar Grove WWTP Sugar Grove Road Sugar Grove, OH	1/1/2011
	Permit Expiration Date
	12/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Lowell Clugston, Operator	(740) 808-6566
Name and Title of Responsible Official	Phone Number
Jacob Nihiser, Mayor	(740) 407-6646 (C)

SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

U	NPDES Compliance	Permit limit violations are still problematic at times.
M	Operations & Maintenance	Rusty, unsafe gratings, jury rigged pump, upflow clarifiers offline
M	Facility Site Review	Fencing needs repair, access to plant uninhibited
S	Collection System	
U	Flow Measurement	Influent flow pump. Effluent flow meter non-functional
S	Receiving Waters	
S	Laboratory	

Comments:

Signatures

	7/10/12		7/10/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

Compliance Data for Sugar Grove WWTP between 8/1/2010 to 7/1/2012

Summary

Permit Effluent Limit Violations: 19
 Permit Effluent Code Violations: 38
 Permit Effluent Frequency Violations: * 0
 Compliance Schedule Violations: 5

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	001	Total Suspended Solids	7D Conc	45	49.	12/22/2010
September 2011	001	E. coli	30D Conc	126	325.5	9/1/2011
September 2011	001	E. coli	7D Conc	284	325.5	9/15/2011
October 2011	001	Total Suspended Solids	30D Conc	30	41.25	10/1/2011
October 2011	001	Total Suspended Solids	30D Qty	7.96	29.6765	10/1/2011
October 2011	001	CBOD 5 day	30D Qty	6.63	8.248	10/1/2011
October 2011	001	E. coli	30D Conc	126	2419.6	10/1/2011
October 2011	001	Total Suspended Solids	7D Conc	45	142.	10/15/2011
October 2011	001	Total Suspended Solids	7D Qty	11.9	109.256	10/15/2011
October 2011	001	CBOD 5 day	7D Qty	10.6	22.3130	10/15/2011
October 2011	001	E. coli	7D Conc	284	2419.6	10/22/2011
February 2012	001	CBOD 5 day	7D Conc	40	43.4	2/22/2012
March 2012	001	Total Suspended Solids	30D Conc	30	31.	3/1/2012
March 2012	001	Total Suspended Solids	7D Conc	45	58.	3/1/2012
March 2012	001	CBOD 5 day	7D Conc	40	48.8	3/1/2012
March 2012	001	Total Suspended Solids	7D Conc	45	49.	3/8/2012
March 2012	001	Total Suspended Solids	7D Qty	11.9	14.3327	3/8/2012
May 2012	001	E. coli	30D Conc	126	2419.6	5/1/2012
May 2012	001	E. coli	7D Conc	284	2419.6	5/15/2012

Code Violations				
Reporting Period	Station	Parameter	Reported Value	Violation Date
April 2011	001	Total Suspended Solids	AF	4/20/2011
April 2011	001	CBOD 5 day	AF	4/20/2011
April 2011	001	Total Suspended Solids	AF	4/21/2011
April 2011	001	CBOD 5 day	AF	4/21/2011
October 2011	001	Water Temperature	AD	10/12/2011
October 2011	001	Water Temperature	AD	10/13/2011
October 2011	001	Water Temperature	AD	10/17/2011
October 2011	001	Water Temperature	AD	10/19/2011
October 2011	001	Water Temperature	AD	10/20/2011
October 2011	001	Water Temperature	AD	10/24/2011
October 2011	001	Water Temperature	AD	10/26/2011
October 2011	001	Water Temperature	AD	10/27/2011
October 2011	001	Water Temperature	AD	10/31/2011
November 2011	001	Water Temperature	AD	11/2/2011
November 2011	001	Water Temperature	AD	11/3/2011
November 2011	001	Water Temperature	AD	11/4/2011
November 2011	001	Water Temperature	AD	11/7/2011
November 2011	001	Water Temperature	AD	11/9/2011
November 2011	001	Water Temperature	AD	11/10/2011
November 2011	001	Water Temperature	AD	11/14/2011
November 2011	001	Water Temperature	AD	11/16/2011
November 2011	001	Water Temperature	AD	11/17/2011
November 2011	001	Water Temperature	AD	11/21/2011
November 2011	001	Water Temperature	AD	11/23/2011
November 2011	001	Water Temperature	AD	11/24/2011
November 2011	001	Water Temperature	AD	11/28/2011
November 2011	001	Water Temperature	AD	11/30/2011

December 2011	001	Water Temperature	AD	12/1/2011
December 2011	001	Water Temperature	AD	12/5/2011
December 2011	001	Water Temperature	AD	12/7/2011
December 2011	001	Water Temperature	AD	12/9/2011
December 2011	001	Water Temperature	AD	12/12/2011
December 2011	001	Water Temperature	AD	12/13/2011
December 2011	001	Water Temperature	AD	12/15/2011
December 2011	001	Water Temperature	AD	12/19/2011
December 2011	001	Water Temperature	AD	12/21/2011
December 2011	001	Water Temperature	AD	12/22/2011
December 2011	001	Water Temperature	AD	12/23/2011

Missing Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
July 2011		1599	Construction	Final Plan Completed
January 2012		1799	Construction	Complete Plans & Specs
July 2012		3099	Construction	Begin Construction
December 2012		4599	Construction	End Construction
January 2013		5699	Construction	Final Compliance w/Effluent Limits

Flow Data for Sugar Grove WWTP between 8/1/2010 and 7/1/2012

	Date	Flows (MGD)
Ten Highest Flows	9/22/2011	0.452
	9/24/2011	0.449
	9/25/2011	0.336
	9/26/2011	0.333
	10/19/2011	0.302
	10/20/2011	0.250
	8/24/2011	0.232
	10/4/2011	0.225
	10/23/2011	0.215
	10/18/2011	0.203
Average Flow Rate		0.049

SECTION D: PERMIT VERIFICATION

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters Y
- (c) Products and production rates conform with permit application..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application Y
- (f) New treatment process added since last inspection N
- (g) Notification given to State of new, different or increased discharges NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments:

SECTION E: COMPLIANCE

- (a) Any significant violations since the last inspection Y
- (b) Permittee is taking actions to resolve violations..... Y*
- (c) Permittee has a compliance schedule Y
- (d) Permittee is meeting compliance schedule..... N*

Comments: *The compliance schedule in the NPDES permit has not been followed by the Village. This is not acceptable. The Village shall submit the report cited in Part 1-C, 1b of the NPDES permit to Paul Vandermeer by August 31, 2012.*

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available..... N*
 If yes, what type?
- (b) Adequate alarm system available for power or equipment failures Y

- (c) All treatment units in service other than backup units N*
- (d) Wastewater Treatment Works classification I
- (e) Operator of Record holds unexpired license of class required by Permit.. Y
Class held: III
- (f) Copy of certificate of Operator of Record displayed on-site Y
- (g) Minimum operator staffing requirements fulfilled..... Y
- (h) Routine and preventative maintenance scheduled and performed Y*
- (i) Any major equipment breakdown since last inspection..... N*
- (j) Operation and maintenance manual provided and maintained..... N
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses NA
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection N

Comments: **Auxiliary power has not been obtained for this facility as requested in the NPDES permit compliance schedule. Upflow clarifiers and the effluent flow meter are both offline and have been so for some time. These inoperative units should be repaired or replaced by the Village so as to optimize operation of the WWTP and comply with the compliance schedule in the NPDES permit.*

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book *Calendar*
- c) Log book(s) kept onsite in an area protected from weather Y
- d) Log book contains the following:
 - i) Identification of treatment works N*
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 N*
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) Y
 - iv) Laboratory results (unless documented on bench sheets)..... Y
 - v) Identification of person making log entries..... Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments: **The log must identify the treatment works and the operator shall immediately begin listing times of arrival and departure on the log.*

SECTION H: COLLECTION SYSTEM

- a) Percent combined system:..... 0%
- b) Any collection system overflows since last inspection Y^
CSO SSO
- c) Regulatory agency notified of overflows Y

- d) CSO O&M plan provided and implemented..... NA
- e) CSOs monitored and reported in accordance with permit..... NA
- f) Portable pumps are used to relieve system..... N
- g) Lift station alarms provided and maintained..... Y
- h) Lift stations equipped with permanent standby power or equivalent..... Y
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N*
- j) Any complaints received since last inspection of basement flooding..... N
- k) Are any portions of the sewer system at or near capacity..... N
- l) Are operations changed during high-flow events?..... N

Comments: ^Due to power outage. *Sewer main replacement back in 2011 has reduced high flow from precipitation events considerably.

SECTION I: SLUDGE MANAGEMENT

- a) Sludge adequately disposed..... Y
Method: *Lancaster WWTP*
- b) If sludge is incinerated, where is ash disposed of..... NA
- c) Is sludge disposal contracted..... Y
Name: *Capital Plumbing*
- d) Has amount of sludge generated changed significantly..... N
- e) Adequate sludge storage provided at plant..... Y
- f) Records kept in accordance with State and Federal law..... Y
- g) Any complaints received last year regarding sludge..... N
- h) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments:

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained..... N*
Type of device: *Influent pump* Device location: *Influent line*
- b) Calibration frequency adequate..... N*
Date of last calibration: *Unknown*
- c) Secondary instruments operated and maintained..... Y*
- d) Flow measurements equipment adequate to handle full range of flows.... Y
- e) Actual flow discharged is measured..... N
- f) Flow measuring equipment inspection frequency..... 3X/wk
- g) Sampling location(s) are as specified by permit..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments: **Influent pump rating is used to determine effluent flow. Repair and return to service of effluent flow meter requested in compliance schedule.*

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) Y
- b) If alternate procedures are used, are they properly approved? NA
- c) Analysis performed more frequency NA
 If yes, are results recorded in permittee's report? NA
- d) Commercial laboratory used:
 Name: *TCCI Laboratory*
 Parameters analyzed: *All but D.O., pH, temperature*
- e) Quality assurance manual provided and maintained NA
- f) Calibration and maintenance of instruments is satisfactory? N*

Comments: **Operator shall immediately begin recording calibration data on bench sheets.*

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No*	None	None	None	None	None	Clear	

Comments: *The Village shall install a sign identifying the outfall as required in the NPDES permit by August 31, 2012. The Village shall verify the installation by e-mailing a photograph of the installed sign to Paul Vandermeer by the above mentioned date.*