



**Environmental
Protection Agency**

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

October 22, 2012

RE: WAYNE COUNTY
CITY OF WOOSTER
NPDES NO: 3PD00013

Mayor Bob Breneman
City of Wooster
1020 Old Columbus Road
Wooster, Ohio 44691-4618

Dear Mayor Breneman:

On October 4, 2012, Ashley Ward and this writer conducted compliance evaluation inspection (CEI) of the City of Wooster Wastewater Treatment Plant (WWTP). Present during the inspection were Kevin Givins and Steve Carathers, City of Wooster WWTP.

At the time of the inspection, the treatment plant was in good operation and maintenance condition. Due to the design of the WWTP, the City is still having effluent violations. A May 2012 report by URS, Inc. outlines the problems with the WWTP and included recommended plant upgrades. Ohio EPA reviewed the report and determined it satisfied the requirement of performing an engineering evaluation of the WWTP. In a July 16, 2012 letter, Ohio EPA requested that the City of Wooster submit a plan to implement the recommendations outlined in the report. To date, Ohio EPA has not received an implementation plan from the City of Wooster.

The following details the results of the CEI:

- 1) The WWTP continues to experience ongoing sludge settleability problems.
- 2) At the time of the inspection, the VLR's mixed liquor suspended solids was a chocolate brown color and was provided with good air circulation and a good amount of rollover was noticeable in all the reactors. Both blowers were operating at maximum capacity the time of the inspection. There are no back up blowers on site.
- 3) At the time of the inspection, all six secondary clarifiers were in operation. The overall condition of the clarifiers is an improvement since the 2011 CEI. The inner rings of the clarifiers were no longer packed with solids. It is understood that, due to sludge settleability problems, the City has been operating all six clarifiers to keep up with treatment. There were some solids floating on the surface of the tank. The weirs were clean and free of solids buildup but some solids were passing over the weirs.
- 4) The flow meters are calibrated on a regular basis.

A summary of the City of Wooster's WWTP discharge violations for outfall 001 for the time period July 1, 2011 to September 1, 2012 are shown below:

Permit No	Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00013*PD	July 2011	001	Dissolved Oxygen	1D Conc	7.0	4.7	7/23/2011
3PD00013*PD	July 2011	001	Dissolved Oxygen	1D Conc	7.0	4.9	7/24/2011
3PD00013*PD	October 2011	001	Dissolved Oxygen	1D Conc	7.0	4.7	10/19/2011
3PD00013*PD	October 2011	001	pH, Maximum	1D Conc	9.0	9.2	10/19/2011
3PD00013*PD	October 2011	001	Dissolved Oxygen	1D Conc	7.0	5.4	10/20/2011
3PD00013*PD	November 2011	001	Dissolved Oxygen	1D Conc	5.0	4.2	11/15/2011
3PD00013*PD	December 2011	001	Total Suspended Solids	7D Conc	24	38.	12/1/2011
3PD00013*PD	December 2011	001	Total Suspended Solids	30D Qty	455	636.963	12/1/2011
3PD00013*PD	December 2011	001	Total Suspended Solids	7D Qty	682	2359.27	12/1/2011
3PD00013*PD	December 2011	001	CBOD 5 day	7D Qty	426	515.260	12/1/2011
3PD00013*PD	December 2011	001	Dissolved Oxygen	1D Conc	5.0	4.1	12/5/2011
3PD00013*PD	December 2011	001	pH, Minimum	1D Conc	6.5	6.4	12/6/2011
3PD00013*PD	January 2012	001	Total Suspended Solids	30D Conc	16	17.5714	1/1/2012
3PD00013*PD	January 2012	001	Total Suspended Solids	30D Qty	455	604.179	1/1/2012
3PD00013*PD	January 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	6.72	7.28	1/1/2012
3PD00013*PD	January 2012	001	Total Suspended Solids	7D Conc	24	35.	1/22/2012
3PD00013*PD	January 2012	001	Total Suspended Solids	7D Qty	682	1449.32	1/22/2012
3PD00013*PD	January 2012	001	CBOD 5 day	7D Qty	426	467.724	1/22/2012
3PD00013*PD	January 2012	001	Oil and Grease, Hexane	1D Conc	10	20.	1/23/2012
3PD00013*PD	April 2012	001	Total Suspended Solids	30D Conc	16	61.3571	4/1/2012
3PD00013*PD	April 2012	001	Total Suspended Solids	7D Conc	24	35.25	4/1/2012
3PD00013*PD	April 2012	001	Total Suspended Solids	30D Qty	455	941.375	4/1/2012
3PD00013*PD	April 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	4.48	4.71214	4/1/2012
3PD00013*PD	April 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	6.72	9.1275	4/1/2012
3PD00013*PD	April 2012	001	CBOD 5 day	30D Conc	10	15.	4/1/2012
3PD00013*PD	April 2012	001	Total Suspended Solids	7D Conc	24	223.	4/8/2012
3PD00013*PD	April 2012	001	Total Suspended Solids	7D Qty	682	3348.75	4/8/2012
3PD00013*PD	April 2012	001	CBOD 5 day	7D Conc	15	48.	4/8/2012
3PD00013*PD	April 2012	001	CBOD 5 day	7D Qty	426	720.875	4/8/2012
3PD00013*PD	May 2012	001	Total Suspended Solids	30D Conc	16	36.6428	5/1/2012
3PD00013*PD	May 2012	001	Total Suspended Solids	30D Qty	455	641.674	5/1/2012
3PD00013*PD	May 2012	001	Nitrogen, Ammonia (NH3)	30D Conc	1.46	1.98143	5/1/2012
3PD00013*PD	May 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	2.19	3.11667	5/1/2012
3PD00013*PD	May 2012	001	CBOD 5 day	30D Conc	10	10.2307	5/1/2012
3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	6.6	5/1/2012
3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	1.8	5/7/2012
3PD00013*PD	May 2012	001	Total Suspended Solids	7D Conc	24	65.3333	5/8/2012
3PD00013*PD	May 2012	001	Total Suspended Solids	7D Qty	682	1374.33	5/8/2012
3PD00013*PD	May 2012	001	Nitrogen, Ammonia (NH3)	7D Conc	2.19	2.35	5/8/2012
3PD00013*PD	May 2012	001	CBOD 5 day	7D Conc	15	16.	5/8/2012
3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	2.6	5/8/2012
3PD00013*PD	May 2012	001	Total Suspended Solids	7D Conc	24	68.	5/15/2012
3PD00013*PD	May 2012	001	Total Suspended Solids	7D Qty	682	1009.26	5/15/2012

3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	6.7	5/21/2012
3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	6.8	5/22/2012
3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	6.9	5/25/2012
3PD00013*PD	May 2012	001	Dissolved Oxygen	1D Conc	7.0	6.6	5/29/2012
3PD00013*PD	June 2012	001	Dissolved Oxygen	1D Conc	7.0	6.4	6/1/2012
3PD00013*PD	June 2012	001	Dissolved Oxygen	1D Conc	7.0	6.6	6/9/2012
3PD00013*PD	June 2012	001	Dissolved Oxygen	1D Conc	7.0	6.4	6/10/2012
3PD00013*PD	June 2012	001	Dissolved Oxygen	1D Conc	7.0	6.9	6/18/2012
3PD00013*PD	June 2012	001	Dissolved Oxygen	1D Conc	7.0	5.8	6/19/2012
3PD00013*PD	July 2012	001	Dissolved Oxygen	1D Conc	7.0	6.3	7/1/2012
3PD00013*PD	July 2012	001	Dissolved Oxygen	1D Conc	7.0	6.5	7/18/2012
3PD00013*PD	July 2012	001	Dissolved Oxygen	1D Conc	7.0	5.5	7/26/2012
3PD00013*PD	August 2012	001	Dissolved Oxygen	1D Conc	7.0	5.2	8/5/2012
3PD00013*PD	August 2012	001	Chronic Toxicity, Pime	1D Conc	1.23	2.	8/14/2012
3PD00013*PD	August 2012	001	Dissolved Oxygen	1D Conc	7.0	6.4	8/21/2012
3PD00013*PD	September 2012	001	Dissolved Oxygen	1D Conc	7.0	2.7	9/1/2012
3PD00013*PD	September 2012	001	Dissolved Oxygen	1D Conc	7.0	3.8	9/4/2012
3PD00013*PD	September 2012	001	Dissolved Oxygen	1D Conc	7.0	5.5	9/8/2012
3PD00013*PD	September 2012	001	Dissolved Oxygen	1D Conc	7.0	5.1	9/22/2012

Overall, the WWTP continues to remain in noncompliance with the National Pollutant Discharge Elimination System (NPDES) permit. The City needs to address the problems with the WWTP by submitting to Ohio EPA the City's plan for implementing the recommendations outlined in the URS report. Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1255.

Respectfully,



Todd Surrena
Engineering Geologist
Division of Surface Water

TMS/cs

cc: Mr. Kevin Givins, Utilities Manager, City of Wooster
Wayne County Health Dept.

ec: Larry Reeder, Ohio EPA, DSW Enforcement, Central Office
Bill Fischbein, Ohio EPA, Legal, CO