



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

Re: **Notice of Violation**
Henry County
McClure WWTP
NPDES Permit 2PA00056

November 20, 2012

Mr. Nick Rettig, Director
Henry County Region Water and Sewer District
1857 Oakwood Avenue
Napoleon, Ohio 43545

Dear Mr. Rettig:

On October 18, 2012, Ms. Dana Martin-Hayden and I conducted an inspection of the wastewater treatment plant (WWTP) serving the Village of McClure located on Woodlawn Avenue in McClure, Henry County. At the time of the inspection, the WWTP was not discharging.

The following was noted during the inspection:

1. Two trees were observed growing in the banks of the lagoons. This compromises the integrity of the lagoon liners. The trees must be removed immediately. More immediate care to remove all weeds and woody brush from the embankments is necessary to maintain the lagoon's clay liner. Discharging of waste water from the lagoon into ground water through a cracked liner could result in contamination of waters of the state.
2. There is currently no log book kept for the WWTP. A log book is required by rule 3745-7-09 (A) of the Ohio Administrative Code (OAC). At a minimum:
 - A. The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
 - B. The records shall be accessible onsite for 24 hour inspection by agency or emergency response personnel.
 - C. At a minimum, the following information shall be recorded:
 - I. Identification of the public water system, sewerage system, or treatment works;
 - II. Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
 - III. Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;
 - IV. Results of tests performed and samples taken, unless documented on a laboratory sheet;

- V. 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
 - VI. Identification of the persons making entries.
- D. The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.
3. Due to issues in the past with increased Inflow & Infiltration (I & I), flow monitoring was added to station 601 of your draft National Pollutant Discharge Elimination System (NPDES) permit. The run time pump counter in your main lift station will need to be repaired and used to provide flow estimates for 24 hour intervals. I & I into the lagoon cannot be determined without influent flow data.
 4. During our inspection, we used the office of McClure's Water Treatment Plant (WTP) while reviewing paperwork and asking inspection questions. The WTP is scheduled to be replaced this fall with a new force main carrying treated water from Napoleon. All water and waste water treatment facilities that are in operation should be maintained, regardless of pending closure. The housekeeping at the WTP was extremely poor. Old, spare and discarded equipment was observed all over the floors inside the building and around the outside of the building. The WTP's waste water discharge lagoons were full of weeds and tree saplings. The sludge from these lagoons remains on the facility property after being informed in several inspection letters from our office that the sludge cannot remain on site and continue to produce leachate that discharges to the stream bordering the west side of the property.

A review of the discharge monitoring reports submitted to our office for the time period from January 1, 2008, to October 1, 2012, revealed several violations of the limits and monitoring requirements contained in your NPDES. A printout of these violations has been enclosed for your review.

Please inform this office, within 10 days, as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include dates, either actual or proposed, for completion of these actions. If these violations continue to occur, we will have no choice but to recommend escalated enforcement action to achieve compliance.

If you have any questions, please call Dana Martin-Hayden at 419-373-3067.

Sincerely,



Peggy B. Christie
Environmental Engineer
Division of Surface Water

/jlm

Enclosures

pc: Chris Diem, Superintendent

ec: Paul Brock, DDAGW, NWDO
Inspection Tracking



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PA00056	OH0053341	10/18/2012	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
McClure WWTP Woodlawn Ave McClure, OH 43534	1:40 PM	1/1/08
	Exit Time	Permit Expiration Date
	2:40 PM	12/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Chris Diem, Superintendent	(419) 748-8200	
Name, Address and Title of Responsible Official	Phone Number	
Henry County Regional Water and Sewer District Mr. Nick Rettig, Director 1857 Oakwood Ave. Napoleon, OH 43545	(419) 599-7370	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	U	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
M	Operations & Maintenance*	S	Effluent/Receiving Waters	N	Self-Monitoring Program
M	Facility Site Review	N	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

* Lagoons had trees and weeds growing on the banks. These need to be removed.

Inspector	Reviewer
 Peggy B. Christie Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water
11/16/12 Date	11/16/12 Date

Permit # :
NPDES #:

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

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

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... N/A
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Permit # :
NPDES #:

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (e) Operator of Record holds unexpired license of class required by permit..... Y
Class: I
- (f) Copy of certificate of Operator of Record displayed on-site..... N*
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... N**
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained.... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping: ***

- (a) Log book provided..... N
- (b) Format of log book (i.e. computer log, hard bound book)..... N
- (c) Log book(s) kept onsite (in an area protected from weather)..... N
- (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)..... N
 - IV. Laboratory results (unless documented on bench sheets)... N
 - V. Identification of person making log entries..... N
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N/A

Comments: * Operator Certification not on the wall, but was available for view.
** Weeds and trees were observed in the embankments I of the lagoon.
*** Operator is making notations in the Water Treatment Plant Log book. A separate book for the WWTP is required.

Permit # :
NPDES #:

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 100%
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

Walked around the lagoons and observed the outfall and upstream. There were two 10' high trees in the lagoon embankment. No animal holes were observed. There were many tall weeds.

Several sso's occurred in a basement. These occurred more before the manhole was cleaned and a blockage cleared up.

Water was very clear in the third lagoon.

Permit # :
NPDES #:

Section H: **Sludge Management**

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
(c) Sludge adequately disposed..... N/A
(Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... N/A
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... N/A
(g) Adequate sludge storage provided at plant..... N/A
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... N/A
(j) Any complaints received in last year regarding sludge..... N/A
(k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

No plans for sludge removal.

Section I: **Self-Monitoring Program**

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify: estimate calculated from
discharge pipe)
- (b) Calibration frequency adequate N/A
(Date of last calibration:)
(c) Secondary instruments operated and maintained..... N/A
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... N
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other – calculated see above

Comments/Status:

Effluent flow is estimated by measuring the height of the water in the effluent pipe. There is currently no monitoring on the influent. Pump run time meter at the lift station is now broken. Discussed using pumping time to estimate the influent flow and the value of documenting influent flow to show if there are any I & I issues.

Permit # :
NPDES #:

Method for composite sampling needs to follow Part II Item G of the NPDES permit. Composite samples need to be collected at 30 minutes apart, but not more than two hours apart.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
(see GLC page 5 and 8)
- (d) 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

Laboratory:

General

- (a) Do you have written Standard Operating Procedures (SOP's) for all analysis performed onsite Y
- (b) Do SOP's include the following if applicable:
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: SOP's are required per Standard Methods 1020A and states "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results."

- (c) EPA approved analytical testing procedures used for all analysis (40 CFR 136.3, see GLC page 8). Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... Y

Permit # :
 NPDES #:

Quality Control/Quality Assurance

- (g) Quality assurance manual provided and maintained..... Y
- (h) Satisfactory calibration and maintenance of instruments/equipment. Y
 (see score from GLC page 7)
- (i) Results of latest USEPA quality assurance performance sampling program:
 Satisfactory Marginal Unsatisfactory
 Date:
- (j) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab:

Lab name: IFM does all parameters except DO and pH.

Comments/Status:

Operator does DO and pH. He uses the same equipment that is used in the water plant. He has a pH log, but needs to set up a calibration log for DO.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No	ND	ND	ND	ND	ND	ND	ND

Comments/Status:

*ND—Not Discharging

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... Y
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?

Permit # :
NPDES #:

(5) How long has the condition existed and when did it begin?

Comments/Status:

McClure will eventually abandon the water treatment plant. However, the housekeeping at the WTP was extremely poor. Old, spare and discarded equipment was observed all over the floors inside the building and around the outside of the building. The WTP's waste water discharge lagoons were full of weeds and tree saplings. The sludge from these lagoons remains on the facility property.

Get New Data		Village of McClure Limit Violations 1/1/08 Through 10/1/12						
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PA00056*CD	November 2011	001	00400	pH	1D Conc	9.0	9.01	11/10/2011
2PA00056*CD	May 2012	001	00400	pH	1D Conc	9.0	9.19	5/24/2012

Get New Data

Village of McClure Code Violations 1/1/08 Through 10/1/12

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PA00056*CD	June 2011	601	00530	Total Suspended Solids			AB	6/22/2011

Get New Data

Village of McClure Frequency Violations 1/1/08 Through 10/1/12

Permit No	Reporting Period		Station	Reporting		Parameter	Sample			Violation
				Code			Frequency	Expected	Reported	Date
2PA00056*CD	May	2008	001	80082		CBOD 5 day	2/Week	2	1	5/1/2008
2PA00056*CD	May	2008	001	80082		CBOD 5 day	2/Week	2	1	5/8/2008
2PA00056*CD	May	2008	001	80082		CBOD 5 day	2/Week	2	1	5/15/2008
2PA00056*CD	May	2008	001	80082		CBOD 5 day	2/Week	2	1	5/22/2008
2PA00056*CD	January	2009	001	80082		CBOD 5 day	2/Week	2	1	1/1/2009
2PA00056*CD	January	2009	001	80082		CBOD 5 day	2/Week	2	1	1/8/2009
2PA00056*CD	January	2009	001	80082		CBOD 5 day	2/Week	2	1	1/15/2009
2PA00056*CD	January	2009	001	80082		CBOD 5 day	2/Week	2	1	1/22/2009
2PA00056*CD	October	2009	001	80082		CBOD 5 day	2/Week	2	1	10/1/2009
2PA00056*CD	October	2009	001	80082		CBOD 5 day	2/Week	2	1	10/8/2009
2PA00056*CD	October	2009	001	80082		CBOD 5 day	2/Week	2	1	10/15/2009
2PA00056*CD	October	2009	001	80082		CBOD 5 day	2/Week	2	1	10/22/2009
2PA00056*CD	May	2012	001	80082		CBOD 5 day	2/Week	2	1	5/8/2012
2PA00056*CD	August	2008	801	00010		Water Temperature	1/Quarter	1	0	8/1/2008
2PA00056*CD	August	2008	801	00610		Nitrogen, Ammonia (NH3)	1/Quarter	1	0	8/1/2008
2PA00056*CD	August	2008	801	31616		Fecal Coliform	1/Quarter	1	0	8/1/2008
2PA00056*CD	August	2008	801	00400		pH	1/Quarter	1	0	8/1/2008
2PA00056*CD	August	2008	801	00300		Dissolved Oxygen	1/Quarter	1	0	8/1/2008
2PA00056*CD	December	2008	801	00010		Water Temperature	1/Quarter	1	0	12/1/2008
2PA00056*CD	December	2008	801	00610		Nitrogen, Ammonia (NH3)	1/Quarter	1	0	12/1/2008
2PA00056*CD	December	2008	801	00400		pH	1/Quarter	1	0	12/1/2008
2PA00056*CD	December	2008	801	00300		Dissolved Oxygen	1/Quarter	1	0	12/1/2008
2PA00056*CD	August	2009	801	00010		Water Temperature	1/Quarter	1	0	8/1/2009
2PA00056*CD	August	2009	801	00610		Nitrogen, Ammonia (NH3)	1/Quarter	1	0	8/1/2009
2PA00056*CD	August	2009	801	31616		Fecal Coliform	1/Quarter	1	0	8/1/2009
2PA00056*CD	August	2009	801	00400		pH	1/Quarter	1	0	8/1/2009
2PA00056*CD	August	2009	801	00300		Dissolved Oxygen	1/Quarter	1	0	8/1/2009