



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

Re: **Notice of Violation**
Hardin County
Village of Forest
NPDES Permit

November 20, 2012

Mr. Bob Bristoll
Village of Forest
211 West Lima Street
P.O. Box 220
Forest, Ohio 45843

Dear Mr. Bristoll:

On November 8, 2012, an inspection was conducted at the wastewater treatment facility serving the Village of Forest. You and Mr. Stephen Manns were present and provided information on operation and maintenance of the wastewater treatment plant (WWTP) and collection system. The effluent observed discharging to Forest Simpson Ditch appeared clear with no noticeable odor.

A review of the discharge monitoring reports (DMRs) from January 2012 to November 2012 shows that there have been several National Pollutant Discharge Elimination System (NPDES) permit limit violations. The specific instances of non-compliance are enclosed on a separate sheet.

An extensive amount of trees and weeds were observed around the lagoons. Weeds and trees are a potential food source for burrowing animals, prevent wind action across the lagoon and can cause leaks in the liner from root penetration. The weeds and trees should be removed and the lagoon dikes should be maintained.

Our completed inspection report is enclosed for your records. If you have any questions, please contact me at (419) 373-3053.

Sincerely,

Ryan Gierhart
Division of Surface Water

/jim

Enclosure

pc: Mayor and Council
ec: Peggy Christie, NWDO DSW
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
2PB00044	OH0025151	11/08/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Forest WWTP South side of CR 20 Forest, Hardin County	9:00 AM	July 1, 2008
	Exit Time	Permit Expiration Date
	10:30 AM	June 30, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Bob Bristoll, Village Administrator Mr. Steve Manns, Operator	419-273-2500	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council Village of Forest 211 W. Lima St, P.O. Box 220 Forest, Ohio 45843	419-273-2500	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Final effluent discharge was clear and had no noticeable odor.</p> <p>Installation of collection system is complete with 97% of homes tied in. 14 Homes have yet to tie into the system and the two CSOs on Dixon Street and Campbell street are still not closed.</p> <p>The Mercury Variance Plan of Study located on page 19 of NPDES Permit under Item. Q. 1.d needs to be completed and an annual PMP reports needs to be submitted</p> <p>Trees and weeds were observed growing around the lagoons. The trees and weeds should be removed and the lagoon dikes should be maintained.</p>	
Inspector	Reviewer
 Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
11/14/12 Date	11/14/12 Date

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) Flows and loadings conform with NPDES permit..... | Y |
| (c) Treatment processes are as described in permit application... | Y |
| (d) All discharges are permitted..... | Y |
| (e) Number and location of discharge points are as described
in permit..... | Y |
| (f) Storm water discharges properly permitted..... | N/A |

Comments/Status:

Section F: Compliance

- | | |
|---|-----|
| (a) Any significant violations since the last inspection..... | N |
| (b) Appropriate Non-compliance notification of violations..... | N/A |
| (c) Permittee is taking actions to resolve violations..... | N/A |
| (d) Permittee has a compliance schedule..... | Y |
| (e) Compliance schedule contained in...NPDES permit | |
| (f) Permittee is in compliance with schedule..... | Y |
| (g) Has biomonitoring shown toxicity in discharge since last inspection | N/A |

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- | | |
|---|---|
| (a) Standby power available....generator <input type="checkbox"/> or dual feed <input type="checkbox"/> | N |
| i. What does the back-up power source operate..... | |

- | | |
|---|--|
| ii. How often is the generator tested under load..... | |
|---|--|

(b) Which components have an alarm system available for power or equipment failures.....

- (c) All treatment units in service other than backup units..... Y
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc)
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... N
- (h) Any plant upsets since last inspection..... N

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)

Hardbound book
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - iii. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - iv. Laboratory results (unless documented on bench sheets)... N/A
 - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications 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..... Y

Comments/Status:

Violations for TSS in May 2012, Oil and Grease in June 2012 and E. Coli in September 2012.

The compliance schedule states that All CSO overflows are to be eliminated by December 31, 2015

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... Y
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....3
 - ii. How many pump stations have telemetered alarms.....3
 - iii. How many pump stations have operable alarms.....3
- (b) Any chronic collection system overflows since last inspection..... N
- (c) Regulatory agency notified of all overflows..... N/A
- (d) CSOs in the collection system....if so, what is the LCTP status..... Y
 - Village has completed separation. Has 14 homes yet to connect to new system.
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... N
- (g) RDII Program established and active..... N
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... N
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

Comments/Status:

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Has the amount of sludge changed significantly since the last inspection..... N/A
- (c) How much sludge storage is provided at the plant.....
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... N/A
- (e) Any complaints received in last year regarding sludge..... N/A
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A

- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... Y

Comments/Status:

Sludge has not been removed from the lagoons. IFM bio augmentation material has been added to reduce sludge.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
 Portable Ultrasonic Flow meter
- (b) Flow meter calibrated annually N
 (Date of last calibration:)
- (c) 24-hour recording instruments operated and maintained..... N
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

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)
- (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

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

Laboratory:

General

- (a) Does the Quality Assurance Manual contain 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: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "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." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N
- (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
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y (see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: All parameters except pH, BOD, Temperature and dissolved oxygen.

Lab name: Alloway

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N/A
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 2PB00061100

Outfall Description: Discharge Clear with no noticeable odor.

Receiving Stream: Forest Simpson Ditch
Receiving Stream Description: Lagoon Discharge is the start of the stream flow.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (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?
- (5) How long has the condition existed and when did it begi

Get New Data								
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PB00044*ID	May 2012	001	00530	Total Suspended Solids	7D Conc	90	98.5	5/1/2012
2PB00044*ID	June 2012	001	00552	Oil and Grease, Hexane	1D Conc	10.0	12.	6/6/2012
2PB00044*ID	September 2012	001	31648	E. coli	7D Conc	362	435.	9/22/2012