



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

Re: **Notice of Violation**
Putnam County
Columbus Grove
NPDES Permit

March 29, 2013

Mr. Jeff Vance
Columbus Grove WWTP
113 East Sycamore Street
Columbus Grove, Ohio 45830

Dear Mr. Vance:

On March 20, 2013, an inspection was conducted at the Village of Columbus Grove's Wastewater Treatment Plant (WWTP). Mr. Bob Huff was present and provided operation and maintenance information on the plant. The final effluent observed entering Plum Creek was clear with no noticeable odor.

A review of the Discharge Monitoring Reports (DMRs) for August 2012 to March 2013 shows that there have been several permit limit violations. The specific instances of non-compliance are enclosed on a separate sheet. Further review of your self-monitoring reports for the previous six months, ending November 2012, indicates that you are in significant non-compliance (SNC) with E. coli. The specific instance of SNC is enclosed on a separate sheet.

The Village has had several violations for Mercury. It was noted that the Village has not been following the pollutant minimization program (PMP) schedule for Mercury as outlined in the National Pollutant Discharge Elimination System (NPDES) permit Part II Item Y. (d). The NPDES permit conditions need to be followed and the annual reports for mercury need to be submitted. I have enclosed the sampling results from Mercury from March 2010 to February 2013. Based on the results, it is apparent that the Mercury levels are not decreasing. The Village is not meeting the 12 ng/L annual average that is required to qualify for the general Mercury variance. The Village will not be able to apply for the general Mercury variance with the NPDES permit renewal. An individual variance can be submitted that will need to be approved through the U.S. EPA Region 5 office or a compliance schedule will be placed in the NPDES permit renewal to meet the water quality effluent based limit of 1.3 ng/L.

Please inform this office in writing 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 the dates, either actual or proposed, for completion of the actions.

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Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in your Part III-General Conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code (ORC) Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance. If the Village is still in SNC for E. coli by August 2013, escalated enforcement action will be pursued.

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

Sincerely,



Ryan Gierhart
Division of Surface Water

/jlm

Enclosures

pc: Mayor and Council, Village of Columbus Grove
Bob Huff, Columbus Grove WWTP

ec: 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
2PC00004*ID	OH0020281	3/3/2011	C	S	1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Village of Columbus Grove WWTP 1371 N. Defiance Street Ottawa OH 45875	1:00 p.m.	8/1/2008
	Exit Time	Permit Expiration Date
	2:30 p.m.	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bob Huff, Operator	419-659-5740 419-233-3825(Cell) (419) 659-2982	
Name, Address and Title of Responsible Official	Phone Number	
Jeff Vance, Village Administrator 113 E. Sycamore Street Columbus Grove, Ohio 45830	(419) 659-2982	

Section C: Areas Evaluated During Inspection

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

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

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

Standard Operation procedures (SOPs) need to be developed for the test parameters performed in the labs. The SOPs need to be developed by September 1, 2013.

An operation and maintenance schedule needs to be developed for the plant equipment. The operation and maintenance that is completed on the plant needs to be included in the log book.

The facility has had several violations for Mercury. It was noted that the facility has not been following the PMP schedule for Mercury as outlined in the NPDES permit Part II item Y(d)

Inspector	Reviewer
 Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office	 Thomas Poffenberger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
3-27-13 Date	3/27/13 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..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES Permit Compliance Schedule
- (f) Permittee is in compliance with schedule..... N
- (g) Has biomonitoring shown toxicity in discharge since last inspection N/A

Comments/Status:

Facility is in SNC for E.coli. The E. coli violations are believed to be from the automatic chlorine feed system not operating properly with the flow meter. The issue has been resolved.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
 - i. What does the back-up power source operate.....

Generator can run the entire plant
 - ii. How often is the generator tested under load.....

Permit # : 2PC00004*ID
 NPDES #: OH0020281

Generator is tested once a week but not under load.

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

Screening building and recirculation and sludge pumps on set up in PLC and are telemetered.

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

Comments/Status:

We recommend that a schedule for routine and preventative maintenance be developed.

 Section G: **Operation & Maintenance con't**

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... II
- (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)

Hard bound 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.)..... N
 - 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..... N

Comments/Status:

Written notification should be sent for effluent limit violations. More detail needs to be included in the operator log book in regards to daily operation and maintenance activities.

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.....0
ii. How many pump stations have telemetered alarms.....0
iii. How many pump stations have operable alarms.....4
- (b) Any chronic collection system overflows since last inspection..... Y
(c) Regulatory agency notified of all overflows..... Y
(d) CSOs in the collection system... if so, what is the LCTP status..... Y
Facility has completed phase one of the sewer separation and is under construction for phase two.
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... Visual
(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:

CSOs are monitored by visual observation.

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.

- (b) Has amount of sludge generated changed significantly since the last inspection..... Y
(c) How much sludge storage is provided at the plant.....

120 days

- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (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..... N/A

Comments/Status:

Anaerobic digester no longer functions, it is being used as a sludge holding tank. A polymer is being added to the sludge and it is being applied to the drying beds to increase solids concentration for landfilling.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):
 Ultrasonic sensor and weir
- (b) Flow meter calibrated annually Y
 (Date of last calibration: 9/2012)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

Comments/Status:

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..... N
 (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

Comments/Status:



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..... N

(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/A

(e) Analyses being performed more frequently than required by permit. N

(f) If (e) is yes, are results in permittee's self-monitoring report..... N/A

(g) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page)

(h) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: Metals, oils/grease, low level mercury, Ammonia

Lab name: Alloway

Discharge Monitoring Report Quality Assurance (DMRQA)

(a) Participation in latest USEPA quality assurance performance sampling..... N

Date:

(b) Were any parameters "Unsatisfactory"..... N/A

(c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Written Standard Operating Procedures (SOPs) still need to be developed.

Section J: Effluent/Receiving Water Observations

Outfall # 001

Outfall Description: Effluent was clear with no odor.

Receiving Stream: Plum Creek

Receiving Stream Description: turbid with steady flow

Comments/Status:

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 begin?

Comments/Status:

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

158-R0035

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Bypasses		
	Stormwater Overflows		
	Alternate Power Source	S	Generator can run entire plant
Preliminary	Maintenance of Collection Systems		
	Pump Station	IN	
	Ventilation		
	Bar Screen	IN	Mechanical fine screen
	Disposal of Screenings	S	Screen dewatering to dumpster to land fill
	Comminutor		
	Grit Chamber	IN	Vortex Grit system
	Disposal of Grit	S	Grit Classifier to collection bags to landfill
Primary	Settling Tanks	IN	2 of 2
	Scum Removal	IN	
	Sludge Removal	IN	1 Sludge Return Pump 1 Sludge Waste Pump
	Effluent	M	Turbid
Sludge Disposal	Digesters	IN	1 anaerobic digester converted to sludge holding tank
	Temperature and pH		
	Gas Production		
	Heating Equipment		
	Sludge Pumps		
	Drying Beds	IN	2 beds in 1 bed used for storage 1 bed used for drying
	Filter Press		
	Disposal of Sludge	S	Landfill
Other	Flow Meter and Recorder	In	Ultrasonic weir
	Records	M	Need more detail on operation and maintenance logs
	Lab Controls	M	Need standard operating procedures developed
	Chemical Treatment		
Secondary-Tertiary List items as required	Trickling Filters	IN	1 primary 1 secondary Both trickling filters arms were rotating.
	Final Clarifier	IN	One final Clarifier
Disinfection	Effluent	S	Clear
	Disinfection System	OUT	Gas chlorine system
	Effective Dosage		
	Contact Time		
	Contact Tank		
	Dechlorination	OUT	Sodium Bisulfate feed system

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PC00004*ID	August 2012	001	31648	E. coli	7D Conc	362	1039.23	8/1/2012
2PC00004*ID	August 2012	001	31648	E. coli	7D Conc	362	2400.	8/22/2012
2PC00004*ID	September 2012	001	31648	E. coli	7D Conc	362	1032.47	9/1/2012
2PC00004*ID	September 2012	001	00400	pH	1D Conc	6.5	6.25	9/20/2012
2PC00004*ID	December 2012	001	50092	Mercury, Total (Low Le	30D Conc	73.1	86.	12/1/2012
2PC00004*ID	January 2013	001	50092	Mercury, Total (Low Le	30D Conc	73.1	83.7	1/1/2013

Get New
Data

Get Detail
for Selected
Permit

Facilities in Significant Non-Compliance **

Period: Aug-12 Jan-13

County	Permit #	Facility Name	Major	Station Code	Param Code	Parameter Name	Max % Exceed	# Months Signif Exceed (1)**	# Months Exceed (2)**
Putnam	2PC00004	Columbus Grove WWTP		1	31648	E. coli	563	2	2

Parameter name: Mercury, Total (Low Level)

Reporting code: 50092 (3/24/2010-2/12/2013)

Units of measure: ng/l

# of Obs.	# of Obs. > MDL	# of Obs. excluded	Min. Value	Max. Value	MaxChk Value	PEQ Method	R ² Value	PEQ average	PEQ max.
30	30	0	1.1111	107	142.67	B	0.94872	126.37	209.05

Permit number: 2PC00004

Outfall number: 001

Footnotes: M 1 - The PEQmaximum is greater than the MaxCheck value.

Date	Reported Value	A Code	MDL	Enter "x" to exclude as outlier
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3/24/2010	47.7			
5/17/2010	14.1			
6/14/2010	29.9			
8/17/2010	14.3			
12/14/2010	27.3			
1/25/2011	66.8			
2/8/2011	1.1111			
3/1/2011	2.67			
4/19/2011	37.5			
5/3/2011	64.3			
6/14/2011	83			
7/5/2011	13.7			
9/6/2011	27.9			
10/11/2011	40.8			
11/8/2011	8.8			
12/13/2011	16.3			
1/10/2012	7.69			
2/14/2012	13.6			
3/13/2012	19.9			
4/30/2012	37.5			
5/1/2012	5.55			
6/5/2012	107			
7/5/2012	28.1			
8/7/2012	7.02			
9/11/2012	9.86			
10/2/2012	16.7			
11/13/2012	68.5			
12/11/2012	86			
1/8/2013	83.7			
2/12/2013	39.4			

