



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

April 2, 2013

RE: ANDOVER WWTP  
NPDES PERMIT NO. 3PB00000\*GD  
ANDOVER VILLAGE, ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

**NOTICE OF VIOLATION**

Mr. Joseph DiBell, Village Administrator  
Village of Andover  
P.O. Box 1267  
134 Maple Street  
Andover, OH 44003

Dear Mr. DiBell:

On April 1, 2013, a site inspection was conducted at the above referenced facility at 500 Russtik Drive Extension, Village of Andover, Ashtabula County. The inspection was conducted by John Schmidt of this office. Richard Mead, Plant Superintendent, and Charlie O’Niell, plant operator represented the Village of Andover (Andover). The purpose of the inspection was to evaluate the facility’s compliance status with respect to the terms and conditions of the facility’s National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on April 3, 2012.

The system consists of screening, influent monitoring, wet well lift station, alum addition, diversion chamber with bar screen and oil and grease removal, fine bubble aeration, clarification, sand filtration, chlorination, post disinfection aeration, and dechlorination. Plant bypasses, when they occur, consist of screening, diversion to an aerated equalization basin prior to mixing with the plant effluent at the chlorine contact tank. Lime and caustic are available for pH adjustment if needed. Sludge management consists of aerobic digestion, dewatering with a belt filter press, with sludge land applied. Decant waters from the sludge process go through a sand filter prior to being returned to the headworks of the plant. The facility discharges to Wade Creek northeast of the facility. A 175 KW generator provides backup power for the entire facility.

**Observations and Notations**

Following are observations made during the inspection:

1. The overall condition of the treatment plant during this inspection was satisfactory. Screenings and grit was containerized for disposal at a solid waste landfill.
2. The plant is operated by Richard Mead, who also operates the Andover Water Treatment Plant on behalf of the Village of Andover.
3. Andover maintains sheets for recording internal process control data and data reporting as prescribed by the NPDES permit, a facility log, onsite operations and maintenance manuals, and a copy of the NPDES permit. The onsite records document plant operations, equipment inspection and maintenance, and maintaining minimum staffing requirements as required by

Ohio Administrative Code (OAC) rule 3745-7-09. Ohio EPA recommends that additional detail be provided in the WWTP log book, including specific hours worked by licensed operators, so that minimum staffing s documented in the log book.

4. The EQ basin was found approximately a quarter full, and meters flow back into the headworks for full treatment during low flow conditions. Andover modified its procedures of when to divert flows to the EQ basin, resulting in fewer bypasses on the plant. Wastewater is now not diverted to the EQ basin until influent flows reach 0.75 to 1.1 MGD. Previously flows were diverted when flows exceeded 0.5 MGD. This has significantly reduced the frequency of bypass events.
5. The influent sampler is maintained at the proper temperature and collects a flow proportional sample.
6. Aeration blowers were found in operating condition. Aeration tanks were a medium brown color with good mixing, and an earthy odor. There was moderate foaming, and air was even across the tanks. The return sludge lines were operating at the time of the inspection. Effluent weirs and outlet channels are scrubbed weekly.
7. Clarifier effluent channels were reasonably clean. Scum was accumulating in areas as designed. The effluent trough was reasonably clean and there was no scum around the effluent baffle or the trough.
8. The sand filter was found in operating condition. Some floating debris was noted on the surface of the water, and is skimmed off using a pool skimmer. Wastewater was observed percolating freely through the sand indicating that the beds were not clogged.
9. Aerobic digesters were found in proper operating condition. Sludge processing areas were not operating at the time of the inspection.
10. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample.
11. The final discharge at Wade Creek was observed as acceptable visual quality. The upstream sample point was noted at the access road bridge over Wade Creek about 150 yards upstream and the downstream monitoring point about 100 yards downstream.
12. The WWTP laboratory performs monitoring of BOD, suspended solids, pH, temperature, dissolved oxygen, and chlorine. Andover Village contracts with Microbac Laboratories of Meadville, PA and Alloway Laboratories of Marion, OH for metals, oil and grease, nitrate-nitrite, low level mercury, bacteria (E. Coli and Fecal Coliform), phosphorus, ammonia-nitrogen, and quality assurance samples from the WWTP laboratory. Laboratory data is returned to the Village of Andover. Mr. Mead submits all data to Ohio EPA's electronic discharge monitoring report (eDMR) system for the Village of Andover.

#### **NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2012 through March 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.3	4/1/2012
001	31648	E. coli	7D Conc	362	750.	5/15/2012
001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.5	7/1/2012
001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.52	8/1/2012
001	01119	Copper, Total Recoverable	30D Conc	20	23.	8/1/2012
001	00665	Phosphorus, Total (P)	7D Conc	1.5	1.52	8/22/2012
001	00665	Phosphorus, Total (P)	30D Conc	1.0	2.12	10/1/2012
001	00665	Phosphorus, Total (P)	7D Conc	1.5	2.12	10/22/2012
001	00665	Phosphorus, Total (P)	30D Conc	1.0	1.45	12/1/2012
001	00665	Phosphorus, Total (P)	30D Qty	1.9	3.04049	12/1/2012
001	00665	Phosphorus, Total (P)	7D Qty	2.84	3.04049	12/1/2012

Ohio EPA has no responses to the bacteria violation from May 2012 or phosphorus violations from April 2012, July 2012, October 2012, or December 2012. Village of Andover notified Ohio EPA of the August 2012 phosphorus violation in an electronic message dated September 19, 2012. Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of any violations, along with measures taken to ensure that they are not repeated. To-date Ohio EPA has not received this notification for several violations, along with measures to ensure that they are not repeated. Note that these continuing violations have placed Andover Village in **significant noncompliance for phosphorus**.

Reporting Violations

No reporting code or reporting frequency violations were noted for the period reviewed.

Compliance Schedule

Your NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
12/01/2012	10/31/2015	01/31/2013	01/30/2013	-----	Other	I/I Status Report
12/01/2012	10/31/2015	04/01/2013	04/01/2013	95999	Other	Phosphorus Status Report
12/01/2012	10/31/2015	06/01/2013	Incomplete	-----	Other	PTI for Phosphorus
03/01/2012	10/31/2015	06/01/2013	Incomplete	04599	Other	Complete construction

Ohio EPA notes that the phosphorus status report indicates that Andover intends to resume the application of alum for phosphorus control. **Ohio EPA notes that Andover is in significant noncompliance for phosphorus. If phosphorus violations continue, a Permit-To-Install (PTI) for plant improvements to treat for phosphorus must be submitted to this office no later than June 1, 2013.** If Andover wishes to discuss the milestones with Ohio EPA a meeting is recommended no later than 30 days prior to the due date of this milestone to give your consultant ample time to complete and submit a PTI on your behalf.

**Comment**

Ohio EPA notes that Andover has cleared vegetation along Wade Creek for a distance of approximately 150-200 feet upstream of its final outfall and is attempting to straighten tilted poured concrete retaining walls. Such disturbance may require coordination with this office under the Federal Clean Water Act Section 401. In the future, Andover should coordinate with this office prior to commencing any work below the high water mark on any streams, as permits may be necessary from Ohio EPA and/or the U.S. Army Corps of Engineers.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

cc: Richard Mead, WWTP Superintendent, Village of Andover

File: Public WW/Andover Village WWTP/PC