



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

April 2, 2013

RE: ORWELL VILLAGE WWTP
ORWELL VILLAGE, ASHTABULA CO.
OHIO EPA PERMIT 3PB00041
COMPLAINCE EVALUATION INSPECTION

Mr. Jack J. Nettis, Jr., Village Manager
Village of Orwell
179 W. Main Street
Orwell, OH 44079

Dear Mr. Nettis:

On April 1, 2013, a site inspection was conducted at the above referenced facility. The inspection was conducted by John Schmidt of this office. Mr. Greg Hogue, Wastewater Superintendent, represented the Village of Orwell during the inspection. 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 March 15, 2012

The system consists of primary screening, pre-aeration and grit removal, additional screening, lift station, equalization basin, oxidation ditch, clarification, sand filtration, UV disinfection, and post disinfection aeration. Sludge management consists of aerobic digestion and a settling lagoon, with sludge land applied via subsurface injection to fields owned by the Village to the southeast of the facility. The facility discharges to a tributary of the Grand River west of the facility at Parker Road.

Observations and Notations

Following are observations made during the inspection:

1. Orwell 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 is documented in the log book.
2. Ohio EPA notes that Mr. Hogue is a Class III wastewater operator, while remaining WWTP staff are Class I operators. In the event that Mr. Hogue is away from the wastewater treatment plant or collection system, there is no Class III or Class II operator in responsible charge of the facility as prescribed by your NPDES permit. Mr. Hogue indicated that Mr. White, a Class 1 Operator, has signed up to sit for the May 2013 Class 2 operators' exam. Orwell should consider having an alternate plan to maintain minimum

staffing until additional operators have secured their Class 2 certifications. Minimum staffing must be maintained at the site as prescribed by OAC 3745-7-02, which for the Orwell WWTP requires a Class III Operator for 40 hours per week. For up to 30 days per year, a Class II Operator may replace Mr. Hogue for vacations, sick leave, conferences, etc,

3. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept.
4. Screenings and grit are currently not containerized. This was noted during the 2012 inspection. Mr. Hogue showed that a special container has been fabricated for this purpose, and is awaiting painting. This container should be placed into service as soon as possible. Collected materials are disposed at a solid waste landfill.
5. Influent sampler is noted as flow proportional and maintained at the proper temperature and condition.
6. The content of the aeration tank had good color and mixing, with minimal foaming. Surface aerators were noted as in operating condition. Sludge returns were a chocolate brown color, with minimal foaming. This is an indicator of a properly operating biological system.
7. The surface of the clarifier was clear, with some pin floc noted. The effluent trough was clean and there was no scum around the effluent baffle or the trough in areas not exposed to sunlight, but there was some biological growth on areas exposed to sunlight. Effluent channels and weirs exposed to sunlight should be cleaned as soon as weather conditions permit.
8. The sand filter was free of sludge. Both filters were operational at the time of the inspection. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
9. The final effluent sampler was converted from a time proportional sampler to a flow proportional sampler in the summer of 2012. The sampler is maintained at the proper temperature and condition.
10. The Orwell WWTP laboratory performs monitoring of BOD, suspended solids, pH, temperature, and dissolved oxygen. Orwell contracts with Microbac Laboratories of Meadville, PA for metals, ammonia-nitrogen, oil and grease, bacteria (E. Coli), volatile organic compounds and semi-volatile organic compounds. Samples are collected on Wednesdays and Fridays each week.
11. The final effluent was clear and of acceptable visual quality.

NPDES Permit Compliance Review

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

Limit Violations

The following limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50092	Mercury, Total (Low Level)	30D Conc	1.3	3.25	3/1/2012
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.	3/1/2012
001	00300	Dissolved Oxygen	1D Conc	5.0	3.98	7/2/2012
001	00610	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	2.6	9/15/2012
001	00610	Nitrogen, Ammonia (NH3-N)	7D Qty	2.96	3.18848	9/15/2012
001	31648	E. coli	7D Conc	284	590.169	10/22/2012

To-date Ohio EPA has not received this notification for the March 2012 or October 2012 violations, along with measures to ensure that they are not repeated. Ohio EPA received notification of the September 2012 violations on October 18, 2012, along with proposed measures to ensure that they are not repeated. 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. Please provide an explanation for the March 2012 and October 2012 violations, along with measures to ensure that they are not repeated.

Reporting Violations

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

Other Violations

The following additional violation of your NPDES permit is noted:

1. Backup Operator of Record: As required by Part II, Item A of your permit, the facility must have a Class III Operator in responsible charge. Part II, Item A(2)(e) contains provisions for a Class II operator as a backup operator for up to 30 consecutive days a year that Mr. Hogue could be away from the WWTP for vacations, trainings, meetings, etc. Currently, Orwell has no provisions for a backup operator in the event Mr. Hogue is away from his duties. Orwell must make provisions for a Class II Operator to operate the WWTP in any absence of your primary operator. **Orwell must have provisions for an operator that possesses at least a Ohio Class II Wastewater Operator's License in the event that Mr. Hogue is unable to be at the WWTP or the collection system a minimum of 40 hours per week. Note that any time working on the water distribution system or water treatment system cannot count towards these 40 hours.**

Compliance Schedule

Regarding the compliance schedule, Ohio EPA notes the following:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
8/1/2010	7/31/2015	3/1/2012	8/1/2011	95999	Other	E. Coli Status Report
8/1/2010	7/31/2015	8/1/2011	NA	-----	Other	Submit PTI if Needed
8/1/2010	7/31/2015	9/1/2011	8/1/2012	95999	Other	E. Coli Status Report

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8/1/2010	7/31/2015	3/1/2012	8/1/2012	05699	Other	Achieve Final Limits
8/1/2010	7/31/2015	8/1/2011	NA	----	Other	NPDES Mod if Needed
8/1/2010	7/31/2015	8/1/2011	NA	----	Other	Apply for Hg Variance if Needed
8/1/2010	7/31/2015	8/1/2011	NA	----	Other	Individual Hg Variance if Needed

As all milestones have been met, no further information is needed.

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 violations or explanations if you believe items are in error. Your response to this letter should include the dates that the actions have been or will be completed.

If you have any questions or comments regarding this inspection, 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: Greg Hogue, Wastewater Superintendent, Village of Orwell

File: Municipal/Orwell WWTP/PC