



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

Re: Richland County  
Village of Butler WWTP  
NPDES Permit

April 11, 2013

The Honorable Kevin Carr  
Mayor of the Village of Butler  
P.O. Box 307  
Butler, Ohio 44822

Dear Mayor Carr,

On March 12, 2013, an inspection was made of the Village of Butler's waste water treatment plant (WWTP). You were present during the inspection, along with the Village's operator Dan. At the time of the inspection, all major treatment units were in operation. The effluent from the treatment plant was relatively clear.

During the inspection, we discussed the compliance schedule included in the National Pollutant Discharge Elimination System (NPDES) permit and the Village's progress in removing I/I from the collection system. The first milestone in the NPDES permit is to submit a Permit to Install (PTI) for upgrades no later than November 1, 2012. During previous meetings and through correspondence, the Village was granted an extended timeline to complete the necessary I/I removal prior to designing upgrades. This extended timeline was summarized in a previous inspection letter to you dated September 19, 2012, as follows:

No later than November 1, 2012, the Village shall complete camera work and other I/I removal investigation. No later than December 1, 2012, the Village shall submit to Ohio EPA a written summary of the results of the investigation identifying any deficiencies and specific steps that will be taken to address these. If any projects requiring a PTI are required to address the I/I, the PTI shall be submitted by February 1, 2013. All of the I/I projects shall be completed by June 1, 2013. Flow monitoring should then be performed to determine the effectiveness of the removal work and to size the required upgrades at the WWTP. A PTI for the WWTP upgrades shall be submitted to our office no later than August 1, 2013.

The Village completed camera inspection and smoke testing on a large portion of the system in October 2012. This work has identified a list of approximately 49 deficiencies that need to be corrected. This list was shared with Ohio EPA via email in January 2013. It did not appear at the time that the corrective actions would require a PTI. To date, the Village has met the extended compliance schedule. The next milestone is for all of the deficiencies to be addressed by June 1, 2013. As discussed during the inspection, the Village has completed some projects; however, the pace of completion does not appear adequate in order to have all the identified items addressed by June 1, 2013.

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During the inspection, we discussed a recently identified crack in the main trunk sewer line coming to the WWTP. Dan has filled the crack with a foam sealer product as a temporary solution. This sewer line was not able to be televised previously due to a blockage. It would appear that major work may be needed to restore integrity to this trunk sewer. This work should be a priority. We discussed several of the projects the Village has planned in the near future to address some of the other identified deficiencies.

A review of the discharge monitoring reports submitted to our office for the period of August 2012 through February 2013 revealed several **violations** of the limits contained in your permit. A printout of these **violations** has been enclosed for your review. No overflow events from the SSO at the State Route 95 bridge were reported during this period.

Your facility is currently in significant non-compliance (SNC) with the limits contained in your NPDES permit. A facility becomes in SNC when it exceeds the effluent limit for four or more months in two consecutive quarters or exceeds the effluent limit significantly in any two months during two consecutive quarters. It appears that the Village will be unable to meet the June 1, 2013, milestone to complete all of the identified I/I repairs. Achieving compliance with Ohio's environmental laws is a primary focus of Ohio EPA in order to reduce risks to public health and welfare.

In order to address the SNC and the NPDES permit compliance schedule, the Village needs to accelerate the progress in completing the I/I removal work. Failure to expedite the process may lead our Agency to initiate enforcement action. We would like to work with you to achieve satisfactory progress to bring this facility back into compliance. **Within 21 days of the date of this letter**, please submit, in writing, the actions that you propose to undertake in order to return your facility into compliance with your NPDES permit. You will need to provide us a timetable for these actions that does not extend past September 1, 2014. Specifically, the timeline shall include dates for completion of the previously identified sewer deficiencies, completion of updated flow monitoring, submittal of a PTI for WWTP upgrades, and completion of WWTP upgrade construction. These actions and timetable may also be submitted by email to me at [walter.ariss@epa.ohio.gov](mailto:walter.ariss@epa.ohio.gov). It would be best to consult with your operator while preparing your response to our office.

If you have any questions, please call me at 419-373-3070.

Sincerely,



Walter Ariss, P.E.  
Environmental Specialist II  
Division of Surface Water

/jlm

Enclosures

ec: Tracking



State of Ohio Environmental Protection Agency  
Northwest District Office

### NPDES Compliance Inspection Report Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PA00044	OH0021431	03/12/2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Butler WWTP 223 Grant St Butler, OH	2:00 PM	5/1/2012
	Exit Time	Permit Expiration Date
	5:15 PM	10/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Kevin Carr, Mayor Dan, Operator	419-883-2481	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Lonnie McGhee		

Ohio EPA Inspector	Ohio EPA Reviewer
 Walter Ariss, P.E. Environmental Specialist II Division of Surface Water Northwest District Office	 Tom Poffenbarger, P.E. Water Quality Engineer / Unit Supervisor Division of Surface Water Northwest District Office
3/12/13 Date	4/8/13 Date

Village of Butler WWTP 3/12/2013 - VISUAL OBSERVATION - UNIT PROCESS  
 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	-	
	Safety Features	S	
	Bypasses	OUT	
	Alternate Power Source	None	Generator rebuild should be complete in next few weeks
Preliminary	Maintenance of Collection Systems	U	Existence of SSO, I/I work needs completed
	Bar Screen	OUT	1 fixed screen
	Disposal of Screenings	S	Landfill
	Comminutor	IN	
	Flow EQ	IN	Both tanks full
Primary	Settling Tanks	IN	1 circular primary
	Imhoff Tank	IN	
	Sludge Removal	OUT	Sludge pumped as necessary
	Effluent	S	
	Pumps to RBCs	IN	
Sludge Disposal	Digesters	IN	2 aerobic
	Temperature and pH	S	
	Sludge Pumps	OUT	Sludge pumped as needed to digestors
	Disposal of Sludge	S	Land applied or sent to another POTW. Will be hauling next week.
Other	Flow Meter and Recorder	IN	Needs to be calibrated. This shall be completed annually.
	Records	S	
	Lab Controls	M	
Secondary-Tertiary List items as	RBC Units	IN	Both units in service.
	Blowers	IN	2 in service, air supply for sludge digestors, Flow EQ, post aeration, 2 backup
	Secondary Clarifiers	IN	2 units, marginal effluent, flow balancing issues evident
Disinfection	Effluent	S	Clear
	Disinfection System	OUT	chlorine gas
	Effective Dosage		
	Contact Time		
	Contact Tank	IN	
	Dechlorination	OUT	Liquid
	Post Aeration	IN	

Get New Data		Butler WWTP NPDES permit limit violations August 2012 through February 2013						
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PA00044*GD	August 2012	001	31616	Fecal Coliform	7D Conc	2000	10000.	8/22/2012
2PA00044*GD	September 2012	001	00300	Dissolved Oxygen	1D Conc	6.0	5.9	9/4/2012
2PA00044*GD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	9/18/2012
2PA00044*GD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	9/21/2012
2PA00044*GD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	9/25/2012
2PA00044*GD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	9/26/2012
2PA00044*GD	October 2012	001	31616	Fecal Coliform	7D Conc	2000	5600.	10/1/2012
2PA00044*GD	October 2012	001	31616	Fecal Coliform	7D Conc	2000	3700.	10/8/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.87	10/19/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	1.89	10/22/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	1.7	10/23/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.95	10/24/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.94	10/25/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	10/26/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	10/30/2012
2PA00044*GD	October 2012	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	10/31/2012