



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

May 22, 2013

RE: WAYNE CO. – GINGERY ALLOTTMENT STP
NPDES PERMIT NO. 3PG00131
WOOSTER TOWNSHIP, WAYNE COUNTY
COMPLIANCE EVALUATION INSPECTION

NOTICE OF VIOLATION

CERTIFIED MAIL

Wayne County Commissioners
428 West Liberty Street
Wooster, OH 44691

Dear Commissioners:

On March 14, 2013, a site inspection was conducted at the above referenced facility at 1800 Myrta Drive, Wooster Township, Wayne County. The inspection was conducted by John Schmidt, Jon Jamison, and Veronica Newsome of this office, with Terry West, Superintendent of Wayne County Environmental Services representing the Wayne County Commissioners. 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 and in conjunction with the renewal of said permit. The last compliance inspection was conducted on July 12, 2007.

The treatment system consists of a trash trap, 12,000 gallon extended aeration plant with clarification, fixed media clarifier, dosing tank, slow surface sand filtration, and a chlorine disinfection tank with tablet chlorination, and a tablet dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publicly owned treatment works (POTW). The facility discharges to an unnamed tributary to Little Apple Creek adjacent to the west side of the facility. The facility is provided with alarms.

Observations and Notations

1. Ohio EPA records reflect that nobody is listed as the Operator of Record (ORC) for this facility. Per Mr. West, Don Hendershott, Terry West, and Steve Wolfe, all employees of Wayne County Environmental Services are operating this facility. An ORC notification form must be completed as soon as possible and submitted for this facility.
2. A copy of the facility log book was not available for inspection. Plant information is maintained on loose-leaf sheets. The current NPDES permit and operation and maintenance manual for the facility were available for inspection. The documents required by Ohio Administrative Code (OAC) 3745-7-09 are not maintained at the facility. Mr. West indicated that he would immediately obtain a bound log book for the facility.
3. The trash trap is clean on as-needed basis, approximately every two months. Sludge is removed on an as-needed basis and hauled to the Dalton wastewater treatment plant (WWTP).

4. The content of the aeration tank had an earthy odor, medium brown color with good mixing and no foam present. The blowers and alarms were cycled and found in operating condition. The blowers were running and the plant was receiving sufficient aeration. The color and odor are typical for an aeration tank. It is unknown when the headers were pulled and cleaned.
5. The surface of the clarifier was clear, with some pin floc noted. Effluent channels were observed in good condition. The skimmer was found in operating condition, and the return sludge lines were observed as operating properly. The clarifier sides are scraped weekly.
6. The upflow clarifier was operating as designed.
7. The sand filter dosing pumps and alarms were cycled and found in operable condition. The water discharged to the sand filters during the cycling operation was observed as clear.
8. The surface sand filters were reasonably clean, raked, and level. Water discharging to the sand filters was noted as clear, and the water freely percolated through the beds, indicating that they are not clogged. Both beds were in operation at the time of the inspection. Only one bed should operate at a time to allow one bed to drain and rest.
9. The disinfection tank and dechlorination systems were not observed as it was outside the normal disinfection season. Disinfection is provided by sodium hypochlorite tables and dechlorination is provided by sodium bisulfide tablets.
10. Sludge is removed from the plant 2-3 times annually and hauled to the Village of Dalton WWTP for processing and disposal.
11. The final discharge pipe at the unnamed tributary to Little Apple Creek was observed as clear and of a satisfactory visual quality. No outfall sign could be located.
12. Analytical testing is performed by Alloway Testing Laboratories. Plant personnel maintain monitoring data, and conduct onsite analysis of pH, and dissolved oxygen, as well as observations of odor, color, and turbidity. eDMR reports are pinned and submitted by Terry West.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2007 through April 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

Limit Violations

The following limit violations are noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.038	.46	6/21/2007
001	50060	Chlorine, Total Residual	1D Conc	0.038	1.04	8/16/2007
001	50060	Chlorine, Total Residual	1D Conc	0.038	.09	5/21/2009
001	50060	Chlorine, Total Residual	1D Conc	0.038	.06	7/2/2009
001	50060	Chlorine, Total Residual	1D Conc	0.038	.06	10/1/2009
001	50060	Chlorine, Total Residual	1D Conc	0.038	.05	5/6/2010
001	31616	Fecal Coliform	30D Conc	1000	7700.	6/1/2010
001	31616	Fecal Coliform	7D Conc	2000	7700.	6/15/2010

001	50060	Chlorine, Total Residual	1D Conc	0.038	.12	9/9/2010
001	50060	Chlorine, Total Residual	1D Conc	0.038	.06	9/23/2010
001	50060	Chlorine, Total Residual	1D Conc	0.038	.51	10/14/2010
001	00530	Total Suspended Solids	30D Conc	12	16.	1/1/2011
001	00530	Total Suspended Solids	30D Qty	.545	1.80681	3/1/2011
001	80082	CBOD 5 day	30D Qty	.454	1.14431	3/1/2011
001	00530	Total Suspended Solids	7D Qty	.817	1.80681	3/8/2011
001	80082	CBOD 5 day	7D Qty	.681	1.14431	3/8/2011
001	00530	Total Suspended Solids	30D Conc	12	32.	5/1/2011
001	00530	Total Suspended Solids	30D Qty	.545	7.52155	5/1/2011
001	00530	Total Suspended Solids	7D Conc	18	32.	5/22/2011
001	00530	Total Suspended Solids	7D Qty	.817	7.52155	5/22/2011
001	50060	Chlorine, Total Residual	1D Conc	0.038	.2	6/14/2011
001	50060	Chlorine, Total Residual	1D Conc	0.038	.2	6/28/2011
001	50060	Chlorine, Total Residual	1D Conc	0.038	.05	7/7/2011
001	50060	Chlorine, Total Residual	1D Conc	0.038	.06	7/28/2011
001	00530	Total Suspended Solids	30D Conc	12	15.	8/1/2011
001	00530	Total Suspended Solids	30D Conc	12	13.	1/1/2012

Part III, Item 12 of your NPDES permit requires that a written explanation as to why these events occurred must be provided, along with measures to ensure that it is not repeated. For future reference, noncompliance notifications must be made within 24 hours of discovery. Noncompliance notification forms may be found at [www.epa.ohio.gov/portals/ 35/permits/24-hour reporting Form4498 bypasses.doc](http://www.epa.ohio.gov/portals/35/permits/24-hour-reporting-Form4498-bypasses.doc) . I shared a copy of the noncompliance notification requirements with Mr. West during the inspection. Please note that these violations have placed Wayne County in significant noncompliance regarding residual chlorine, with total suspended solids appearing to be a chronic problem at this plant.

Reporting Violations

The following reporting code violations are noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids			AB	7/7/2011
001	80082	CBOD 5 day			AB	7/14/2011

The following reporting frequency violations are noted:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00010	Water Temperature	1/Week	1	0	11/22/2007
001	00083	Color, Severity	1/Week	1	0	11/22/2007
001	01330	Odor, Severity	1/Week	1	0	11/22/2007
001	01350	Turbidity, Severity	1/Week	1	0	11/22/2007
001	00010	Water Temperature	1/Week	1	0	05/08/2008
001	00083	Color, Severity	1/Day	1	0	05/02/2008
001	00083	Color, Severity	1/Day	1	0	05/03/2008
001	00083	Color, Severity	1/Day	1	0	05/04/2008
001	00083	Color, Severity	1/Day	1	0	05/05/2008
001	00083	Color, Severity	1/Day	1	0	05/06/2008
001	00083	Color, Severity	1/Day	1	0	05/08/2008
001	00083	Color, Severity	1/Day	1	0	05/09/2008
001	00083	Color, Severity	1/Day	1	0	05/10/2008

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001	00083	Color, Severity	1/Day	1	0	05/11/2008
001	00083	Color, Severity	1/Day	1	0	05/12/2008
001	00083	Color, Severity	1/Day	1	0	05/13/2008
001	00083	Color, Severity	1/Day	1	0	05/14/2008
001	00083	Color, Severity	1/Day	1	0	05/16/2008
001	00083	Color, Severity	1/Day	1	0	05/17/2008
001	00083	Color, Severity	1/Day	1	0	05/18/2008
001	00083	Color, Severity	1/Day	1	0	05/19/2008
001	00083	Color, Severity	1/Day	1	0	05/20/2008
001	00083	Color, Severity	1/Day	1	0	05/21/2008
001	00083	Color, Severity	1/Day	1	0	05/23/2008
001	00083	Color, Severity	1/Day	1	0	05/24/2008
001	00083	Color, Severity	1/Day	1	0	05/25/2008
001	00083	Color, Severity	1/Day	1	0	05/26/2008
001	00083	Color, Severity	1/Day	1	0	05/27/2008
001	00083	Color, Severity	1/Day	1	0	05/28/2008
001	00083	Color, Severity	1/Day	1	0	05/30/2008
001	00083	Color, Severity	1/Day	1	0	05/31/2008
001	01330	Odor, Severity	1/Day	1	0	05/02/2008
001	01330	Odor, Severity	1/Day	1	0	05/03/2008
001	01330	Odor, Severity	1/Day	1	0	05/04/2008
001	01330	Odor, Severity	1/Day	1	0	05/05/2008
001	01330	Odor, Severity	1/Day	1	0	05/06/2008
001	01330	Odor, Severity	1/Day	1	0	05/08/2008
001	01330	Odor, Severity	1/Day	1	0	05/09/2008
001	01330	Odor, Severity	1/Day	1	0	05/10/2008
001	01330	Odor, Severity	1/Day	1	0	05/11/2008
001	01330	Odor, Severity	1/Day	1	0	05/12/2008
001	01330	Odor, Severity	1/Day	1	0	05/13/2008
001	01330	Odor, Severity	1/Day	1	0	05/14/2008
001	01330	Odor, Severity	1/Day	1	0	05/16/2008
001	01330	Odor, Severity	1/Day	1	0	05/17/2008
001	01330	Odor, Severity	1/Day	1	0	05/18/2008
001	01330	Odor, Severity	1/Day	1	0	05/19/2008
001	01330	Odor, Severity	1/Day	1	0	05/20/2008
001	01330	Odor, Severity	1/Day	1	0	05/21/2008
001	01330	Odor, Severity	1/Day	1	0	05/23/2008
001	01330	Odor, Severity	1/Day	1	0	05/24/2008
001	01330	Odor, Severity	1/Day	1	0	05/25/2008
001	01330	Odor, Severity	1/Day	1	0	05/26/2008
001	01330	Odor, Severity	1/Day	1	0	05/27/2008
001	01330	Odor, Severity	1/Day	1	0	05/28/2008
001	01330	Odor, Severity	1/Day	1	0	05/30/2008
001	01330	Odor, Severity	1/Day	1	0	05/31/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/02/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/03/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/04/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/05/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/06/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/08/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/09/2008

001	01350	Turbidity, Severity	1/Day	1	0	05/10/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/11/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/12/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/13/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/14/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/16/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/17/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/18/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/19/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/20/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/21/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/23/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/24/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/25/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/26/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/27/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/28/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/30/2008
001	01350	Turbidity, Severity	1/Day	1	0	05/31/2008
001	00300	Dissolved Oxygen	1/Week	1	0	05/08/2008
001	00010	Water Temperature	1/Week	1	0	07/01/2008
001	80082	CBOD 5 day	1/Month	1	0	07/01/2008
001	00300	Dissolved Oxygen	1/Week	1	0	07/01/2008
001	00010	Water Temperature	1/Week	1	0	01/01/2009
001	00300	Dissolved Oxygen	1/Week	1	0	01/01/2009

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. A fact sheet on this requirement may be found online at http://epa.ohio.gov/portals/35/permits/24-hour_Report_FactSheet.pdf. Noncompliance notification forms may be found online at <http://epa.ohio.gov/dsw/permits/individuals.aspx>. For future reference, noncompliance notifications must be made within 24 hours of discovery. No explanation has been provided as to why missing data was not collected.

Compliance Schedule Violations

NPDES Permit 3PG00131*DD does not contain a compliance schedule; therefore there are no compliance schedule violations. Please note that due to the significant noncompliance, your next NPDES permit will contain a compliance schedule.

Other Violations

1. Notification of ORC: Your NPDES permit requires that your wastewater treatment works must be under the supervision of a Class I State Certified Operator. Although the plant is being seen by licensed operators, Ohio EPA has not received designation of the ORC for this Facility. Mr. West, Mr. Hendershott, and Mr. Wolfe must formally notify Ohio EPA that they are the designated operators of record. Necessary forms for doing this may be found on the web at <http://epa.ohio.gov/dsw/opcert/opcert.aspx>. Please submit this executed form to our central office and copy this writer. When this permit is renewed, Ohio rules (Ohio Administrative Code 3745-7-04) obligate the ORC to inspect and maintain the facility three times weekly for a total of 1.5 hours, as well as being available to respond to any emergencies if and when they arise.

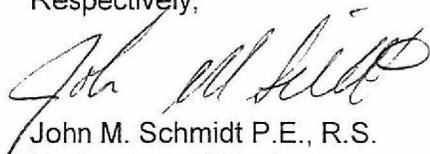
NPDES Permit Renewal

Please note that your current NPDES permit expired on February 28, 2013. The renewal application was received by Ohio EPA on September 4, 2012, within the prescribed timeframe specified by Part III of your NPDES permit. You will continue to follow your existing permit until your new NPDES permit becomes effective.

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 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

pc: Todd Surrena, DSW CO
Terry West, Superintendent, Wayne County Environmental Services
File: Municipal/Wayne Co. – Gingery STP/PC(3PG00131)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee B. Received by (Printed Name) C. Date of Delivery Barbara A chapin 5/20/13
1. Article Addressed to: Wayne County Commissioners 428 West Liberty Street Wooster, OH 44691	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
2. Article Number 7012 1010 0002 2260 0727 (Transfer from service label) 5/28/13 DSW (J Schmidt)	