



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

May 22, 2013

RE: WAYNE CO. – HILLCREST WWTP
NPDES PERMIT NO. 3PH00047
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 1975 Sylvan 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 August 12, 2010.

The treatment system consists of a bar screen, 200,000 gallon extended aeration plant with clarification, dosing tank, rapid sand filtration, and a chlorine disinfection tank with dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publicly owned treatment works (POTW), or there are provisions for dewatering sludge on sludge drying beds. The facility discharges to Apple Creek adjacent to the south side of the facility. An emergency generator provides backup power to the facility and the facility is provided with alarms.

Observations and Notations

1. Ohio EPA records reflect that Terry West, Don Hendershott, and Steve Wolfe, all employees of Wayne County Environmental Services are operators of record 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 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 WWTP.
4. The headworks grinder has not been in operation for the past 12 years, according to Mr. West. Influent wastewater passes through a manual bar screen.

5. 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.
6. The surface of the clarifier was clear, with some floating solids. Effluent channels were observed in good condition. Clarifier sides are scrapped weekly. The skimmer was found in operating condition, and the return sludge lines were observed as operating properly.
7. The sand filters are not being operated due to their deteriorating condition as noted during the 2010 inspection and is currently being bypassed. Mr. West feels that this is a safety issue for his personnel. This is a violation of Part III, Item 11 of your NPDES permit. The sand filters must be either repaired or replaced. If the sand filter must be replaced, you must submit and obtain a permit-to-install (PTI) from Ohio EPA.
8. The disinfection tank and dechlorination systems were in operation as it was outside the normal disinfection season. Disinfection is provided by chlorine gas in 150 lb cylinders. The tanks will require cleaning prior to commencement of the disinfection season.
9. Sludge is removed from the plant periodically and hauled to the Village of Dalton WWTP for processing and disposal.
10. Influent and effluent samples are collected as a manual grab sample, and not as a flow-proportional composite sample as prescribed by your NPDES permit.
11. The final discharge pipe at Apple Creek was observed as clear and of a satisfactory visual quality. No final outfall signage 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. Electronic discharge self-monitoring reports (eDMR) reports are pinned and submitted by Terry West.

NPDES Permit Compliance Review

A review of the eDMRs received by Ohio EPA for the period July 1, 2010 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	31616	Fecal Coliform	7D Conc	2000	4800.	8/1/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	.05	8/9/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	.06	10/26/2010
001	00530	Total Suspended Solids	7D Conc	18	20.5	4/1/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.06	5/26/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.06	5/30/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.05	6/6/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.05	7/13/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.05	8/8/2011
001	50060	Chlorine, Total Residual	1D Conc	0.019	.05	10/18/2011

001	00530	Total Suspended Solids	30D Conc	12	12.1428	12/1/2011
001	00530	Total Suspended Solids	30D Conc	12	21.25	3/1/2012
001	00530	Total Suspended Solids	7D Conc	18	19.	3/8/2012
001	00530	Total Suspended Solids	7D Conc	18	22.	3/15/2012
001	00530	Total Suspended Solids	7D Conc	18	34.5	3/22/2012
001	50060	Chlorine, Total Residual	1D Conc	0.019	.14	5/1/2012
001	50060	Chlorine, Total Residual	1D Conc	0.019	.12	5/2/2012
001	31616	Fecal Coliform	7D Conc	2000	4000.	6/22/2012
001	31616	Fecal Coliform	7D Conc	2000	3000.	7/8/2012
001	00530	Total Suspended Solids	30D Conc	12	16.125	8/1/2012
001	00530	Total Suspended Solids	7D Conc	18	22.5	8/1/2012
001	00530	Total Suspended Solids	7D Conc	18	20.	8/22/2012
001	00530	Total Suspended Solids	7D Conc	18	21.	10/1/2012
001	00530	Total Suspended Solids	30D Conc	12	13.125	11/1/2012
001	00530	Total Suspended Solids	30D Conc	12	13.375	12/1/2012
001	00530	Total Suspended Solids	7D Conc	18	19.	12/1/2012
001	00530	Total Suspended Solids	7D Conc	18	21.5	12/8/2012

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. 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. 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 total suspended solids and residual chlorine.

Reporting Violations

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

Compliance Schedule Violations

NPDES Permit 3PH00047*ED 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. Unauthorized Discharges: Part III, Item 11 of your NPDES permit states that bypassing or diverting wastewater from the treatment works is prohibited. Bypassing the sand filters is prohibited. This was noted in the 2010 inspection and has still not been rectified. The following actions must be taken as soon as possible to comply with this provision of the permit:
 - Immediately make necessary interim repairs to the sand filter to ensure that the component is functional and cease the bypass or provide a rationale of why timely repairs cannot be made.
 - Provide a schedule for completing long-term repairs to the sand filter, submitting a PTI application for replacement of the sand filters, or a schedule for submitting a PTI to convert the WWTP into a pump station and force main and pumping sewage treated by this plant to the City of Wooster for treatment.

2. Duty to Mitigate or Prevent Discharges in Violation of Permit: Part III, Item 14 of your NPDES permit requires you to take all reasonable steps to minimize or prevent any discharge in violation of this permit. The facility has chronic violations of chlorine residuals, total suspended solids, and bacteria. The following actions must be taken as soon as possible to comply with this provision of the permit:
 - Immediately make necessary interim repairs to the plant to prevent future violations of suspended solids, bacteria, and chlorine residuals.
 - Provide a schedule for completing long-term plant repairs, submitting a PTI application for replacement of plant components, or a schedule for submitting a PTI to convert the WWTP into a pump station and force main and pumping sewage treated by this plant to the City of Wooster for treatment.

3. Outfall Signage: Part II, Item T of your NPDES permit required you to post an outfall sign for your final effluent no later than July 1, 2008. No outfall signage was noted for Outfall 001.

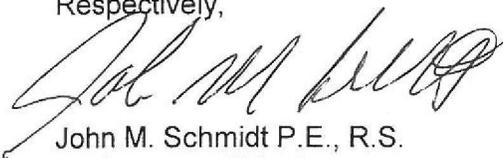
NPDES Permit Renewal

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 or my supervisor, Dean Stoll at

Respectively,



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

JMS/cs

cc: Todd Surrena, Ohio EPA, DSW, CO
Terry West, Superintendent, Wayne County Environmental Services

File/Municipal/Wayne Co. – Hillcrest STP/PC(3PH00047)

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PS Form 3800, August 2006 See Reverse for Instructions

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<p>1. Article Addressed to:</p> <div style="background-color: #add8e6; padding: 10px; border: 1px solid #000;"> <p>Wayne County Commissioners 428 West Liberty Street Wooster, OH 44691</p> </div>	<p>3. Service Type</p> <p><input checked="" 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.</p>
<p>2. Article Number (Transfer from service label) <i>7012 1010 0002 2260 0765</i></p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>PS Form 3811, February 2004</p>	<p>Domestic Return Receipt <i>5-24-13</i> 102595-02-M-1540</p>

