



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

June 4, 2013

**Re:** Jackson County  
Village of Coalton WWTP  
Reconnaissance Inspection/Notice of Violation  
NPDES Permit OPA00012\*HD/OH0050776  
Significant Non-Compliance  
**Certified Mail 70102780000197079574**

Mayor and Council  
Village of Coalton  
P.O. Box 98  
Coalton, Ohio 45621

Dear Mayor and Council:

On May 23, 2013, Ohio EPA conducted a reconnaissance inspection at the village's wastewater treatment plant. Ohio EPA was represented by Bruce Goff, Permit Supervisor, Jennifer Witte, Enforcement Supervisor, and myself, Aaron Pennington, Inspector. The Village of Coalton was represented by Tom Woltz, Village Administrator, Greg Farrar, Operator, and Consultant Gary Silcott, Jr. USDA was also represented by Ryan Springer. The purpose of the reconnaissance inspection was discuss the continued non-compliance of the facility since the construction of the new plant. Ammonia violations continue to reoccur with the newly constructed plant. Solids accumulations post the clarifier appear to be the primary problem. These accumulations raise the concentration of the wastewater as they pass through the end units of the treatment process, notably the UV chamber and the chlorine contact chamber. We discussed some various options that could be taken to improve the plant performance. Those included:

- Dedicating additional man hours for cleaning treatment units.
- Filling in a sizeable portion of the chlorine chamber (careful not to impact flow meter accuracy)
- Improving the clarifier Return Activated Sludge (RAS) collection

The Village has provided non-compliance notifications that have repeatedly discussed problems with the RAS collection in the clarifier(s). They have reported increasing efforts and man hours to keep up with the maintenance of the WWTP. A facility in Significant Non-compliance, such as Coalton, requires Ohio EPA to have a formal enforcement plan for the facility. This plan needs to include additional action(s) the Village will be taking to return to compliance. In addition the actions need to include a completion date. The Village needs to provide Ohio EPA with a list of these action(s) with completion dates to ensure that compliance is being pursued. Please respond by June 24, 2013 with this list. In the event no further actions are being pursued and non-compliance continues, Ohio EPA would seek enforcement with penalty to ensure a return to compliance.

**Notice of Violation - Significant Non-Compliance**

A summary of Violations for ammonia, CBOD5, and TSS are shown below with a look back since prior the improvements:

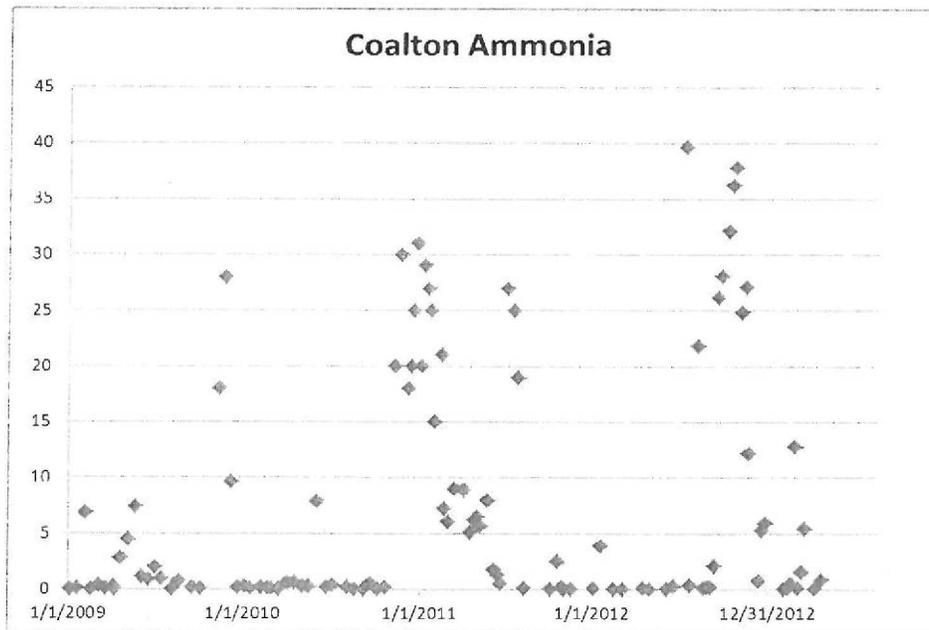
| Coalton TSS Violations |      |      |      |            |
|------------------------|------|------|------|------------|
| 2009                   | 2010 | 2011 | 2012 | April 2013 |
| 3                      | 4    | 39   | 14   | 0          |

| Coalton Ammonia Violations |      |      |      |            |
|----------------------------|------|------|------|------------|
| 2009                       | 2010 | 2011 | 2012 | April 2013 |
| 16                         | 17   | 44   | 35   | 5          |

| Coalton CBOD5 Violations |      |      |      |            |
|--------------------------|------|------|------|------------|
| 2009                     | 2010 | 2011 | 2012 | April 2013 |
| 0                        | 2    | 11   | 6    | 0          |

Notes: Construction occurred mid-late 2011 with the polishing pond removed. New plant was in use ~April 2012 with first ammonia violations for 2012 in July. Additional violations for Total Residual Chlorine, Dissolved Oxygen, and Fecal Coliform have occurred.

Ammonia concentrations are charted below:



Please provide a written response by June 24, 2013. A copy of the inspection report is enclosed. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington  
District Representative  
Division of Surface Water

AMP/dh

Enclosure

- c: Tom Woltz, Village of Coalton
- c: Greg Farrar, Operator (send to Coalton)
- c: Gary Silcott, Stantec
- c: Ryan Springer, USDA/RD



State of Ohio Environmental Protection Agency  
Southeast District Office

Municipal NPDES Compliance Inspection Report

| Section A: National Data System Coding |           |                |                 |           |               |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit #                               | NPDES #   | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| OPA00012*HD                            | OH0050776 | May 23, 2013   | R               | S         | 1             |

| Section B: Facility Data   |                 |                        |
|--|-----------------|------------------------|
| Name and Location of Facility Inspected  | Entry Time      | Permit Effective Date  |
| Coalton WWTP<br>Shook Street<br>Coalton, Ohio  | 10:30 a.m.      | November 1 2012        |
|  | Exit Time       | Permit Expiration Date |
|  | 11:30 a.m.      | October 31, 2017       |
| Name(s) and Title(s) of On-Site Representative(s)  | Phone Number(s) |                        |
| Tom Woltz, Village Administrator<br>Greg Farrar, Operator of Record<br>Gary Silcott, Jr., Stantec - Consultant |                 |                        |
| Name, Address, and Title of Responsible Official   | Phone Number    |                        |
| Mayor and Council  |                 |                        |

| Section C: Areas Evaluated During Inspection  |                          |   |                           |   |                         |
|---|--------------------------|---|---------------------------|---|-------------------------|
| (S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable) |                          |   |                           |   |                         |
| N   | Permit                   | N | Flow Measurement          | N | Pretreatment            |
| N   | Records/Reports          | N | Laboratory                | N | Compliance Schedules    |
| M   | Operations & Maintenance | N | Effluent/Receiving Waters | N | Self-Monitoring Program |
| M   | Facility Site Review     | N | Sludge Storage/Disposal   |   | Other                   |
| N   | Collection System        |   |                           |   |                         |

| Section D: Summary of Findings (attach additional sheets if necessary)  |  |  |  |
|---|--|--|--|
| Ohio EPA met with the Village to discuss the non-compliance of the WWTP. Ammonia violations have continued to be present with the newly constructed WWTP. Continueing efforts by the village to return to compliance have included: calling in the Compliance Assistant Unit, reseeding the mixed liquor, increasing operator time to address solids in the UV and chlorine contact chamber, and clarifier maintenance. Solids accumulations post-clarifier seem to be the prime culprit for the reoccurring ammonia violations. We discussed options for consistent compliance such as: dedicating more man hours to remove solids accumulation and improving the clarifier RAS collection to lessen amount of solids passing through. |  |  |  |
| <b>Inspector</b>  |  | <b>Reviewer</b>  |  |
|   |  |  |  |
| Aaron M. Pennington<br>Division of Surface Water<br>Southeast District Office   |  | Jennifer M. Witte<br>Compliance & Enforcement Supervisor<br>Division of Surface Water<br>Southeast District Office |  |
| 6-3-13<br>Date  |  | 6/3/13<br>Date   |  |

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 Mayor & Council, Vill. of Coalton  
 Street, Apt. No.,  
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 City, State, ZIP+4  
 Coalton, OH 45621

PS Form 3800, August 2006 See Reverse for Instructions

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 Mayor & Council  
 Village of Coalton  
 P.O. Box 98  
 Coalton, OH 45621

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*Jim Miller*  Agent  Addressee

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 Jim Miller

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