



March 1, 2013

**CERTIFIED MAIL**

Mayor and Council  
City of Wooster  
538 North Market Street  
Wooster, Ohio 44691

Wooster WPCP  
3PD00013\*PD

**Re: Notice of Violation - Nine Minimum Control Implementation/Collection System Inspection**

Dear Mayor and Council:

On January 30, 2013, Ohio EPA Division of Surface Water (DSW) staff members Ashley Ward, Todd Surrena and I met with representatives from the City of Wooster Steve Carathers, Water Pollution Control Plant (WPCP) Supervisor, and Kevin Givens, Utilities Manager, to conduct an inspection of the Wooster wastewater collection and treatment system. This letter focuses on the combined sewer overflows (CSOs), the degree of implementation of the nine minimum controls (NMCs) for reducing CSOs, the requirements of the Director's Final Findings and Orders (DFFO) and the status of the Long-Term Control Plan (LTCP).

Discussion during the inspection, review of records, and review of information submitted to this office indicates that the City of Wooster is currently in compliance with the permit requirements calling for implementation of the NMCs. The NMCs are included in Part II, Item E of your current National Pollutant Discharge Elimination System (NPDES) permit (Ohio EPA No. 3PD00013\*PD). Details regarding the City's efforts and additional measures the City should implement to maintain compliance are contained in Attachment A.

During the inspection, the swirl concentrators at the two CSO Stations (003 and 004) were observed to be empty and the Tideflex anti-intrusion device at CSO Station 003 was observed to be properly closed. The City should evaluate the cost of installing flow monitoring devices on these two remaining CSO outfalls to collect accurate occurrence and flow volume data.

The DFFO (dated February 21, 2012) Section V.1.c includes the following: "within 180 days of approval of the [final evaluation] Report, submit a Permit to Install (PTI) application for any recommended upgrades to the wastewater treatment plant set forth in the Report necessary to comply with the current NPDES permit." On May 21, 2012 Ohio EPA received a report from the City of Wooster titled *City of Wooster, Ohio – Water Pollution Control Plant Evaluation and Capabilities Report*. The report was approved by Ohio EPA in a letter to the City dated July 16, 2012 from Todd Surrena. Our records indicate that Wooster is in violation of the DFFO for failure to submit a PTI in accordance with Section V.1.c for the upgrades to the wastewater treatment plant by January 12, 2013.

Please provide a written response to this violation addressed to my attention no later than March 31, 2013 at the following address:

Ohio EPA, DSW  
NPDES Permits & Compliance Unit  
P.O. Box 1049  
Columbus, OH 43216-1049

Please also provide a PTI for the recommended upgrades to the wastewater treatment plant as soon as possible. The PTI should be addressed to the attention of Dennis DeNiro at the following address:

Division of Environmental and Financial Assistance  
P.O. Box 1049  
Columbus, OH 43216-1049

Please be advised that if this violation of the DFFO is not rectified, and if satisfactory progress is not made, escalated enforcement will be recommended to achieve compliance.

The current status of the City's LTCP (*City of Wooster, Ohio Combined Sewer Collection System Long-Term Control Plan [January 2004-Revised December 2005]*) was also discussed during the inspection. Two projects remain from the list included in Figure 22 of Section 4.3 of the 2005 Revised LTCP; the Spink Street Area and Gasche Street Area Collection System Controls. The City indicated that the Spink Street Area project is scheduled for 2013 and the Gasche Street Area project is scheduled for 2014.

The Discharge Monitoring Report (DMR) data submitted to Ohio EPA for CSO Stations 003 and 004 was reviewed for January 2007-December 2012. During this time period, more than one CSO occurrence was reported per day on several occasions. If a discharge from a CSO station occurs intermittently during a day, starting and stopping several times, count "1" occurrence for that day. If a discharge from a CSO station occurs on more than one day, but is the result of a continuing precipitation event, it should be counted as one occurrence. Please refer to this reporting guidance for future CSO occurrence data submittal to Ohio EPA.

If you have questions or concerns regarding this letter, I can be reached by telephone at (614) 644-2039 or email at [Caitlin.Ruza@epa.state.oh.us](mailto:Caitlin.Ruza@epa.state.oh.us).

Sincerely,

Caitlin Ruza  
Environmental Engineer  
Division of Surface Water, NPDES Permits & Compliance  
Ohio EPA, Central Office

encl: Attachment A: City of Wooster Nine Minimum Controls Compliance Inspection Summary

cc: Steve Carathers, City of Wooster WPCP Supervisor  
Dennis DeNiro, Ohio EPA – CO DEFA  
Kevin Givens, City of Wooster Utilities Manager  
Paul Novak, Ohio EPA – CO DSW  
Dean Stoll, Ohio EPA – NEDO DSW  
Todd Surrena, Ohio EPA – NEDO DSW  
Ashley Ward, Ohio EPA – CO DSW  
Ohio EPA CO DSW – File

**Attachment A**  
**City of Wooster Nine Minimum Controls Compliance Inspection Summary**

Part II – Other Requirements Item E, in the permittee's NPDES permit (Ohio EPA No. 3PD00013\*PD), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls (NMCs). Part II.B. of the National Combined Sewer Overflow (CSO) Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

1. Proper operation & regular maintenance programs for the sewer system and CSOs.

City of Wooster (City) staff operates and maintains the Water Pollution Control Plant (WPCP) and collection system. Summaries of overflow characteristics are reported in the Discharge Monitoring Report (DMR) submitted to Ohio EPA monthly.

Ohio EPA records indicate that a centralized collection system Operations and Maintenance (O&M) manual has been developed and was approved in 1996. The City indicated that the O&M manual was last reviewed in 2011 when a Capacity, Management, Operation, and Maintenance Program was developed under the requirements of the Ohio EPA Director's Final Findings and Orders (DFFO) dated February 21, 2012. The City indicated that clipboards are used to document maintenance and inspection activities at the lift stations. The City's Engineering Department maintains the collection system and is therefore responsible for documenting maintenance and inspection activities in the system. The City indicated that the work done on the collection system is documented at the Engineering Department and they submit a monthly report to the WPCP staff summarizing collection system maintenance activities and issues resolved. The City has also developed an interactive map of the collection which is available on the City's website.

2. Maximum use of the collection system for storage.

The permittee indicated that the two permitted CSO Stations 003 and 004 are regulated through weirs and swirl concentrators in line with the CSO outfalls. The swirl concentrators reduce the amount of solids in the wet weather discharges at the CSO outfalls and provide additional storage capacity to the collection system.

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.

The City reported that the pretreatment program is reviewed in accordance with the NPDES permit and one industrial user is equipped with on-site storage to prevent industrial discharges during wet weather events.

4. Maximize flow at the WWTP for treatment.

City staff indicated that the design daily influent flow rate for the plant is 7.5 million gallons per day (MGD). The City staff operates the treatment plant to treat as much flow as possible. The City reported that the wet weather treatment capacity of the WPCP is 27- 30 MGD which can be sustained for approximately 3 hours.

5. Prohibition of CSOs during dry weather.

The permittee indicated the CSO outfalls are inspected at a minimum of once per month. No dry weather overflows (DWOs) were observed in the past year, but the City acknowledged the proper reporting procedure if an overflow event should occur. Discharges during dry weather have always been prohibited by the NPDES program. Such discharges can create serious public health and water quality problems.

6. Control of solid and floatable materials in CSOs.

The City conducts street cleaning and leaf collection on a regular basis. The swirl concentrators are cleaned annually to remove buildup of grit. Any floatables collected in the swirl concentrators are diverted back to the WPCP.

7. Pollution prevention.

The permittee conducts regularly scheduled seasonal leaf collection and street sweeping activities. The swirl concentrators remove solids from CSO discharges prior to entering waters of the State.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.

Ohio EPA observed proper signage at the two CSO outfalls. The City indicated that the annual CSO report is available on

the City website, a CSO-related insert would be included in the next utility bill and notification of CSO-related information is included in the local newspaper during the recreation season.

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

The City currently estimates the overflow volume from the swirl concentrators. The City reported that the swirl concentrators are connected to the SCADA system which records the duration of the CSO overflow. The City should evaluate the cost of installing automatic flow monitors at both of the swirl concentrator outfall pipes to enable the City to collect accurate occurrence and flow volume data. This data can be used to evaluate whether the goals of the LTCP have been adequately achieved.