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

April 11, 2013

RE: LAKE COUNTY
VILLAGE OF MADISON WWTP
NPDES PERMIT NO. OH0023515
OHIO EPA PERMIT NO. 3PB00030

Mr. Sam Britton, Jr., Mayor
Village of Madison
126 W. Main Street
Madison, OH 44057-0007

Dear Mayor Britton:

On April 9, 2013, this writer conducted a compliance evaluation inspection of the Village of Madison Wastewater Treatment Plant. The purpose of the inspection was to evaluate the wastewater treatment plant's operation and maintenance condition, and to evaluate the facility's compliance with the National Pollutant Discharge Elimination System (NPDES) permit. Mr. James Borsi of AKE Laboratories, Operator of Record, and Mr. Dan Gerson, P.E. of URS Consultants, Village Engineer, accompanied this writer during the inspection.

Wastewater Treatment Plant Observations
At the time of inspection, operation of the plant was satisfactory. The plant was discharging an effluent of satisfactory visual quality, free from debris, suspended solids, oil and grease. General operation and maintenance of the grounds, processes and equipment were satisfactory. Sludge cake is disposed via landfilling at the Lake County Solid Waste Facility.

NPDES Permit
Discharge Monitoring Reports (DMRs)
A review of the DMRs covering the period of December 2011 through March 2013 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	16	39.75	12/1/2011
001	00530	Total Suspended Solids	30D Qty	30.3	119.719	12/1/2011
001	00530	Total Suspended Solids	7D Qty	45.4	65.5183	12/1/2011
001	00610	Nitrogen, Ammonia (NH3	30D Qty	11.0	12.6331	12/1/2011
001	80082	CBOD 5 day	30D Qty	24.6	24.9516	12/1/2011
001	00665	Phosphorus, Total (P)	30D Conc	0.73	.93	12/1/2011
001	00665	Phosphorus, Total (P)	30D Qty	1.4	2.897	12/1/2011
001	50092	Mercury, Total (Low Level)	30D Qty	0.000019	.00003	12/1/2011
001	00530	Total Suspended Solids	7D Conc	24	82.	12/8/2011
001	00530	Total Suspended Solids	7D Qty	45.4	205.911	12/8/2011
001	00530	Total Suspended Solids	7D Conc	24	31.5	12/15/2011
001	00530	Total Suspended Solids	7D Qty	45.4	113.145	12/15/2011
001	00530	Total Suspended Solids	7D Conc	24	30.5	12/22/2011

001	00530	Total Suspended Solids	7D Qty	45.4	94.3013	12/22/2011
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	16.5	18.2444	12/22/2011
001	00665	Phosphorus, Total (P)	7D Qty	2.1	2.897	12/22/2011
001	00530	Total Suspended Solids	30D Conc	16	21.25	1/1/2012
001	00530	Total Suspended Solids	7D Conc	24	28.	1/1/2012
001	00530	Total Suspended Solids	30D Qty	30.3	60.0854	1/1/2012
001	00530	Total Suspended Solids	7D Qty	45.4	66.1163	1/1/2012
001	80082	CBOD 5 day	30D Qty	24.6	29.2325	1/1/2012
001	00665	Phosphorus, Total (P)	30D Qty	1.4	1.7028	1/1/2012
001	00530	Total Suspended Solids	7D Qty	45.4	50.8117	1/15/2012
001	00530	Total Suspended Solids	7D Conc	24	35.	1/22/2012
001	00530	Total Suspended Solids	7D Qty	45.4	113.073	1/22/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	16.5	17.7982	1/22/2012
001	80082	CBOD 5 day	7D Conc	19.5	20.5	1/22/2012
001	80082	CBOD 5 day	7D Qty	36.9	70.2647	1/22/2012
001	00530	Total Suspended Solids	7D Conc	24	30.	2/22/2012
001	00530	Total Suspended Solids	7D Qty	45.4	53.0619	2/22/2012
001	50092	Mercury, Total (Low Level)	30D Conc	10.1	11.6	3/1/2012
001	50092	Mercury, Total (Low Level)	30D Qty	0.000019	.00003	3/1/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.7	5.078	5/1/2012
001	00610	Nitrogen, Ammonia (NH)	30D Qty	3.2	6.86911	5/1/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	3.825	5/8/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	4.9	6.40501	5/8/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	7.85	5/15/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	4.9	10.1740	5/15/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	4.765	5/22/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	4.9	6.57572	5/22/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.7	3.1125	6/1/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	6.38	6/1/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	3.2	3.92148	6/1/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	4.9	8.07096	6/1/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	4.615	6/8/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	4.9	6.14302	6/8/2012
001	00665	Phosphorus, Total (P)	30D Conc	0.73	.79	7/1/2012
001	00530	Total Suspended Solids	30D Qty	30.3	35.7442	10/1/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.7	1.91	10/1/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	3.22	4.19876	10/1/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.6	5.225	10/8/2012
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	4.93	9.63642	10/8/2012
001	00530	Total Suspended Solids	7D Qty	45.5	53.5047	11/1/2012
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	11	11.7758	12/1/2012

The Data Substitution Code "AH" was used numerous times during the months of July 2012 and August 2012, citing in the comment section "unaware that the new permit became effective". This is a misuse of the data substitution codes and is considered a violation of the NPDES permit. This agency expects the village and its operator to be aware of the requirements of the NPDES and to conduct the required monitoring and reporting of data as required by the NPDES permit.

Part II, Item U of the existing NPDES permit requires Total Kjeldahl Nitrogen, Total Nitrite plus Nitrate, and Total Phosphorus at Outfalls 001 and 901 to be monitored on the same day. During the inspection, Mr. Borsi stated that he collects the samples for these pollutants on the same day, as required. However, a review of the DMRs shows that monitoring for Total Nitrite plus Nitrate and Total Phosphorus during the months of August 2012 and December 2012 were not performed on the same days. If this is a clerical error, the error must be corrected in the DMR system.

A review of the DMRs also shows a Sanitary Sewer Overflow was reported on October 29, 2012 for Station 300. Sanitary Sewer Overflow Occurrences at Station 300 are for overflows that occur in the collection system only. The overflow that was reported on October 29, 2012 occurred at the wastewater treatment plant. The occurrence was reported on the form for Non-Compliance Notification for Bypasses and Upsets (Form 4498) as required, but should not be reported at Station 300 of the DMR system. Please make the necessary corrections to the DMR system.

Other Reporting Requirements
Part II, Item O (1) (g) of the existing NPDES permit requires the submittal of an annual Pollutant Minimization Plan report to meet the general mercury variance requirements. The annual report is due by March 1st of each year. To date, this office has not received the required reports to be submitted for 2012 and 2013. Be advised that failure to submit these reports in a timely manner is a violation of the NPDES permit and may result in replacing the general mercury variance with a water quality based mercury effluent limitation of 1.3 ng/l. If the annual reports have been submitted to the DSW Central Office, please provide this office with copies.

The Sewage Sludge Disposal Annual Report for 2012 was submitted on January 28, 2013; however, this office does not have record of receipt of the Sewage Sludge Disposal Annual Report for 2011 which was to have been submitted by January 31, 2012. Failure to submit the required report is a violation of the NPDES permit. Please immediately submit the required report.

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code Chapter 6111.

Sanitary Sewer Long Term Maintenance Plan
The Sanitary Sewer Long Term Maintenance Plan was submitted and accepted by this office on January 14, 2013. The Village will meet with Ohio EPA on July 1st of each year to discuss the progress made and status of the sanitary sewer collection system. During this meeting, the Village will provide this office with a written summary of the street location of work performed/completed each year and the street location of work anticipated to be performed for the following year.

Actions to be Taken by Permittee
Within 10 days of the date of this letter, you are directed to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions regarding this letter, please contact the undersigned at (330)963-1183.

Sincerely,

Marie Underwood

Marie Underwood, P.E.
Environmental Engineer
Division of Surface Water

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