



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

Re: **Notice of Violation**  
Huron County  
City of Bellevue WWTP  
Ohio EPA Permit 2PB00037  
NPDES Permit No. OH0020672

September 27, 2013

Mr. Jeff Crosby  
Safety Service Director  
City of Bellevue WWTP  
3000 Seneca Industrial Parkway  
Bellevue, Ohio 44811

Dear Mr. Crosby:

On September 16, 2013, you and Mr. Eric MacMichael met with Mr. Tom Poffenbarger, Mr. Andrew Gall and I at the Ohio EPA Northwest District Office. The purpose of the meeting was to discuss the submission of reports/plans required by the City of Bellevue Wastewater Treatment Plant (WWTP) National Pollutant Discharge Elimination System (NPDES) permit and the completion of projects and submission of reports/plans that are required by Director's Final Findings and Orders. Below is a summary of items discussed at the meeting and items that need to be submitted to Ohio EPA:

- 1. Submission of a response letter to the July 2, 2013, Pretreatment inspection Letter/Notice of Violation (NOV).**  
Response was due 30 days from July 2, 2013 (August 2, 2013). Specifically, we are looking for information on how the City is going to improve implementation of the pretreatment program requirements related to issuance of NOVs to the industrial users when violations of local limits occur. More time needs to be spent implementing a record keeping system that will document compliance with the pretreatment record keeping requirements.
- 2. Formal submission of staffing level report that was required in the Findings and Orders.**  
This report was due July 4, 2013. A draft email version was submitted and comments were returned to the City. We received an email from Mr. Crosby in response to comments and have not heard or received anything further. A hard copy of this report and any supporting documentation along with a summary of the findings of the staffing evaluation should be submitted to Ohio EPA NWDO.
- 3. Submission of the monthly status reports that are required to by the findings and orders.**  
These monthly status reports should include updates on the compliance status of the Bunge portion of the orders.
- 4. Submission of the Pollutant Minimization Program (PMP) for Bis II and Total Dissolved Solids.**  
This is required by the NPDES permit Compliance Schedule and was due August 1, 2013.

**5. Submission of the Local limits evaluation.**

This is required by the NPDES permit compliance schedule and was due August 1, 2013.

**6. Submission of the Standard Operating Procedure (SOP) and Raw Data for the Total Dissolved Solids (TDS) test that is run by Bellevue WWTP lab.**

A copy of the raw data sheets from November 2012 thru August 2013 was submitted to Ohio EPA on September 25, 2013. However, a copy of the SOP being used by the Bellevue WWTP lab was not included with the September 25, 2013, submittal.

**7. Submission of the Pretreatment Annual Report**

This report is required by Part II, Item BB.9.b of the Bellevue NPDES permit and was due September 15, 2013.

**8. Submission of the Mercury Variance Annual Report**

This report is required by Part II, Item CC.1.g of the Bellevue NPDES permit and was due September 15, 2013.

**9. Submission of a list of properties that are located along the US 20 corridor but are not connected to the City of Bellevue sanitary sewer system.**

In order to return to compliance, please complete the above noted reports and plans and have them submitted to us by October 1, 2013. If you will need more time to get them completed, please provide us with the dates when you will have them submitted.

Within **21** days of the date of this letter, please submit, in writing, the actions that you propose to undertake in order to return your facility into compliance and ensure that future reports and plans are submitted in a timely manner.

Sincerely,

Handwritten signature of Thomas Poffenbarger in cursive, followed by the word "For" in a smaller font.

Elizabeth A. Wick, P.E.  
Environmental Engineer/Section Manager  
Division of Surface Water

AG/jlm

ec: Eric MacMichael, City of Bellevue WWTP  
Jeff Crosby, City of Bellevue  
Elizabeth Wick, NWDO-DSW  
Andrew Gall, NWDO-DSW  
Tom Poffenbarger, NWDO-DSW  
Tracking