



John E. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Hardy, Director

Certified Mail 91 7108 2133 3932 1837 9413

September 25, 2013

Lin Hinsley
Richwood WWTP
286 S. Franklin Street
Richwood, OH 43344

NOTICE OF VIOLATION

**Re: Richwood WWTP
Self-Monitoring Report Violations
NPDES Permit 4PB00018/ OH0027260
Union County**

Dear Mr. Hinsley:

We are in receipt of your self-monitoring report covering the month of August 2013 for the referenced facility. Our review of compliance indicates violations of the conditions of your NPDES permit. Therefore, this letter serves as a **Notice of Violation**.

Findings:

1. Permit limits of ammonia were exceeded in May, June, July, and August 2013. The facility is in Significant Non Compliance (SNC) due to violations within the time period. SNC is a programmatic definition used to prioritize enforcement. In this case, the facility is in SNC due to ammonia and fecal coliform exceeding effluent limits by greater than 40% in at least two months out of a six month period. **Please provide details on the causes and how the violations will be prevented in the future.**

Attached are permit compliance tables and an ammonia chart indicating relatively consistent non-compliance during the summer of 2013.

2. The renewed permit requires a Class II operator to be present 5 days a week for a total of 20 hours.
 - a. The Village is attempting to reduce the staffing requirement by 10 hours. To obtain the staffing reduction, the Village will need to first be compliant

with permit limits. Once permit compliance is met, the WWTP will need to be automated with continuous monitoring per OAC 3745-07-04.

- b. I have spoken with John Kincaid, a licensed Class III operator, and he has indicated that the Village and he are close to agreeing on a contract.

Please provide an update on the progress the Village is making at meeting the minimum staffing requirements. Note that the Village is in violation of the NPDES permit until the staffing requirements are met.

3. The facility has provided some response to violations within the DMR but there are improvement opportunities with codes and comments.

- a. There were 5 CBOD samples in May 2013 which were marked as "AK" which means "Too Numerous to Count" which reserved for bacteria samples such as E. coli. A comment was included in the eDMR which stated "CI2 was high lab did not test". **The code "AB" should be used for events like this.** Additionally, a more detailed explanation should be submitted within the overall DMR comment section or you could provide me an e-mail with what happened. **Please resubmit the eDMR with the appropriate code.**

- b. The July 2013 ammonia exceedance included a comment that "The controller on the SBR plant was [not] working properly". For these types of effluent violations, the following information should be provided as appropriate within the DMR:

- i. The name of the permittee, and a contact name and telephone number;
- ii. The time(s) at which the discharge occurred, and was discovered;
- iii. The approximate amount and the characteristics of the discharge;
- iv. The stream(s) affected by the discharge;
- v. The circumstances which created the discharge;
- vi. The name and telephone number of the person(s) who have knowledge of these circumstances;
- vii. What remedial steps are being taken; and,

Lin Hinsley
Richwood WWTP
Page 3

viii. The name and telephone number of the person(s) responsible for such remedial steps.

See Part III Section 13 of the NPDES permit for non-compliance notification requirements.

A response is required by October 18, 2013. Please note that failure to achieve NPDES permit compliance will result in enforcement which may include a monetary penalty. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.state.oh.us.

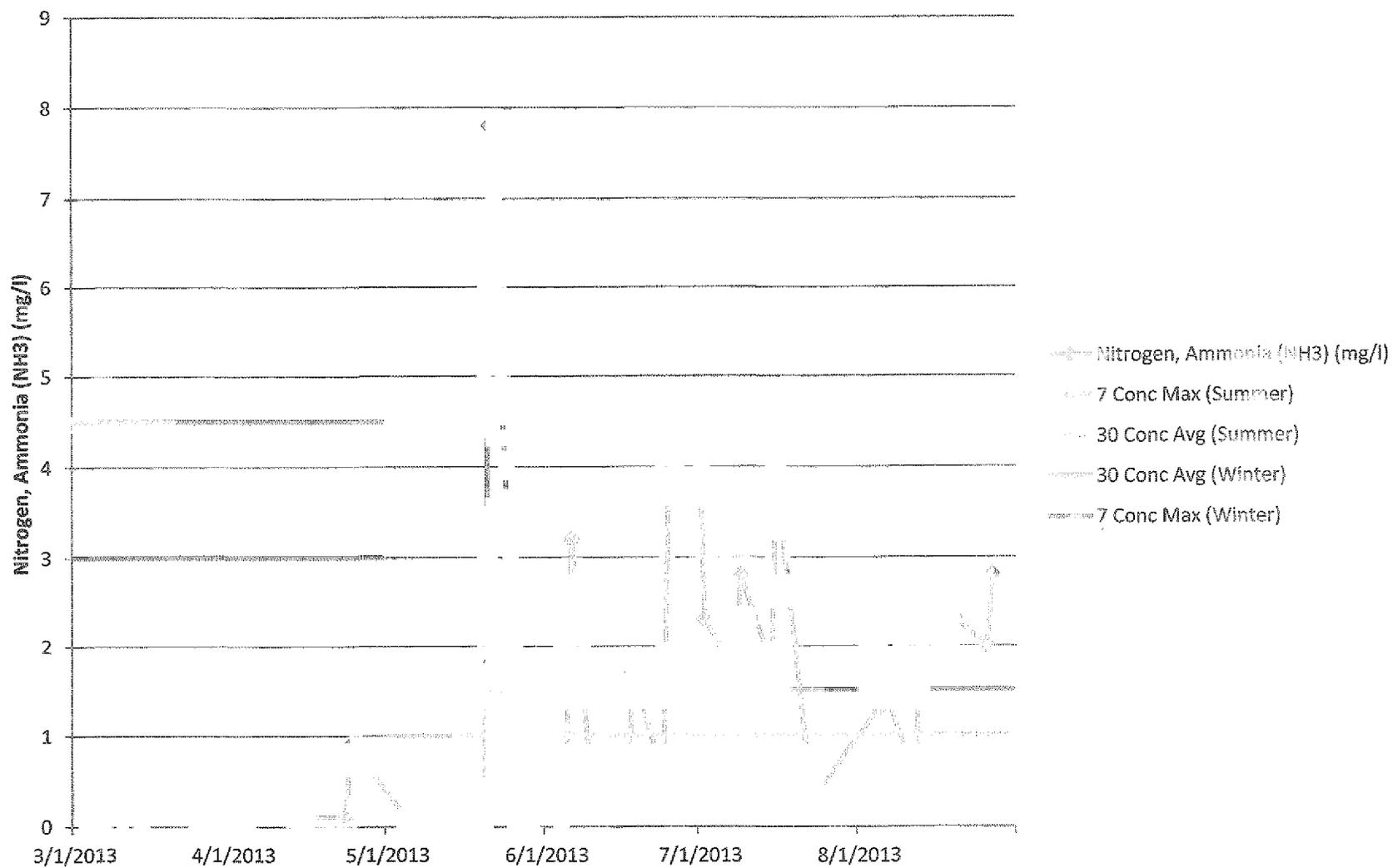
Sincerely



Cole Miller
Environmental Specialist II
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

c: File Copy

Richwood WWTP Nitrogen, Ammonia (NH₃)



Compliance Data for Richwood WWTP between 3/1/2013 to 7/31/2013

Summary

Permit Effluent Limit Violations: 22
 Permit Effluent Code Violations: 5
 Permit Effluent Frequency Violations: 0
 Compliance Schedule Milestones Not Entered: 0

Limit Violations						
Month	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2013	001	CBOD 5 day	30D Conc	8.0	37.6666	5/1/2013
May 2013	001	CBOD 5 day	30D Qty	12	43.6587	5/1/2013
May 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.9	5/15/2013
May 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	2.2	3.70514	5/15/2013
May 2013	001	CBOD 5 day	7D Conc	12	56.5	5/22/2013
May 2013	001	CBOD 5 day	7D Qty	17	65.4880	5/22/2013
June 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.95	6/1/2013
June 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	2.2	2.9224	6/1/2013
June 2013	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.425	6/1/2013
June 2013	001	Nitrogen, Ammonia (NH3)	30D Qty	1.4	2.3	6/1/2013
June 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.3	6/22/2013
June 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	2.2	3.77365	6/22/2013
July 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.25	7/1/2013
July 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	2.2	5.24469	7/1/2013
July 2013	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.2125	7/1/2013
July 2013	001	Nitrogen, Ammonia (NH3)	30D Qty	1.4	4.54186	7/1/2013
July 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.25	7/8/2013
July 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	2.2	9.50924	7/8/2013
July 2013	001	Chlorine, Total Residu	1D Conc	0.019	.095	7/9/2013
July 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.85	7/15/2013
July 2013	001	Nitrogen, Ammonia (NH3)	7D Qty	2.2	2.59405	7/15/2013
July 2013	001	Fecal Coliform	7D Conc	2000	6797.05	7/15/2013
August 2013	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.8	8/1/2013
August 2013	001	Fecal Coliform	7D Conc	2000	3651.02	8/8/2013
August 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.05	8/15/2013
August 2013	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.4	8/22/2013

Code Violations				
Reporting Period	Station	Parameter	Rel. Value	Violation Date
May 2013	001	CBOD 5 day	AK	5/6/2013
May 2013	001	CBOD 5 day	AK	5/7/2013
May 2013	001	CBOD 5 day	AK	5/13/2013
May 2013	001	CBOD 5 day	AK	5/14/2013
May 2013	001	CBOD 5 day	AK	5/20/2013

Flow Data for Richwood WWTP between 3/1/2013 and 8/31/2013

	Date	Flows (MGD)
Ten Highest Flows	4/12/2013	2.163
	4/11/2013	1.307
	7/8/2013	1.167
	6/12/2013	1.153
	6/11/2013	1.143
	4/13/2013	1.086
	7/9/2013	1.086
	6/15/2013	1.032
	4/24/2013	0.928
	6/13/2013	0.867
Average Flow Rate		0.344