



Certified Mail #91 7108 2133 3932 1837 9369

October 7, 2013

Ray Withers, Superintendent
Little Jelloway Creek WWTP
17602 Coshocton Road
Mt. Vernon, OH 43050

NOTICE OF VIOLATION

Re: Little Jelloway Creek WWTP
NPDES Permit 4PJ00100/ OH0037117
Reconnaissance Inspection
Knox County

Dear Mr. Withers:

On September 18, 2013, a Reconnaissance Inspection was conducted at the Little Jelloway Creek WWTP. Present for the inspection were yourself, and, Suzanne Matz and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the plant with respect to the renewal of the NPDES permit for the upgraded Little Jelloway WWTP which was placed into operation in April - May of 2013. **This letter also serves as a Notice of Violation based on the following findings.**

Findings

- 1. Significant Non-Compliance** - The plant is currently in Significant Non-compliance (SNC) for violations of the total suspended solids (TSS) limits contained in the NPDES permit. A facility is placed in SNC when limits for conventional parameters are exceeded by 40% in any two months in a six month period. In order to be removed from the SNC list, the county must comply with TSS limits for three consecutive months. Failure to comply with the terms of conditions of the NPDES permit is a violation of Ohio Administrative Code (OAC) 3745-33. The exceedance TSS limits, which occurred in April and July, were attributed to exceptionally heavy rain events when the plant experienced peak daily flows as high as 2.43 MGD. These high flows overwhelmed the

biological and mechanical capabilities resulting in NPDES permit effluent violations. Please see attached violation list.

Furthermore, recent DMR data has shown that since the new flow meter has been placed into operation, reported discharge flows during precipitation events has been significantly higher than what has been reported previously. This may indicate that the flow data from the old plant did not accurately measure the flows this facility receives. The higher values indicate that the collection system may be experiencing excessive inflow and infiltration. As discussed on site, once the area receives moderate to heavy rain fall the wastewater treatment plant flows immediately increase and rise to more than twice the design flow.

The renewal NPDES permit will include a schedule of compliance requiring Knox County to systematically evaluate and repair both the Apple Valley and Howard collection systems with respect to inflow and infiltration in order to reduce flow and to insure future permit compliance.

In addition, during the inspection, cake sludge was observed being tracked out of the sludge storage building and on to the paved driveway. Any rain event could cause this material to be washed into the Little Jelloway Creek via the nearby storm drain. Should this occur, it would be considered an unpermitted discharge of pollutants to waters of the state and must be eliminated. Please provide Mike Sapp, of this office, with a plan to keep all sludge under roof and off the paved driveway areas by no later than December 15, 2013.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3849 or e-mail at john.owen@epa.state.oh.us.

Sincerely



John Owen, P.E.
Environmental Specialist II
Permits Group
Division of Surface Water
Central District Office

c: File Copy

ec: John Owen, P.E.
Mike Sapp,

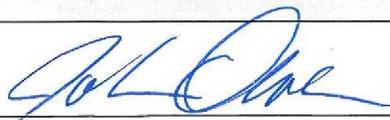
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PJ00100	OH0037117	RI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
9/18/2013	11:00 AM	12:30 PM	Yes	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Little Jelloway Creek WWTP	2/1/2009
	Permit Expiration Date
	1/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Ray Withers, Superintendent	(740) 397-7041
Name and Title of Responsible Official	Phone Number
Ray Withers, Superintendent	(740) 397-7041

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Significant concentration and loading violations
M	Operations & Maintenance	Drag out of cake sludge from storage area
N	Facility Site Review	
U	Collection System	Review of the flow data indicates I/I problems
S	Flow Measurement	
N	Receiving Waters	
N	Laboratory	

Comments:

Signatures	
 10/3/13	 10/3/13
John Owen, P.E., Inspector Permits Group Division of Surface Water Central District Office	Anthony Hanes, P.E., Reviewer Permits Group Supervisor Division of Surface Water Central District Office

Compliance Data for Little Jelloway Creek WWTP between 4/1/2013 to 9/30/2013

Summary

Permit Effluent Limit Violations: 12

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: * 0

Compliance Schedule Milestones Not Entered: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2013	001	Total Suspended Solids	7D Conc	18	19.	4/1/2013
April 2013	001	CBOD 5 day	7D Conc	15	18.	4/1/2013
April 2013	001	CBOD 5 day	30D Qty	34.1	39.0351	4/1/2013
April 2013	001	CBOD 5 day	7D Qty	51.1	64.2238	4/8/2013
July 2013	001	Total Suspended Solids	30D Conc	12	95.	7/1/2013
July 2013	001	Total Suspended Solids	30D Qty	40.9	818.175	7/1/2013
July 2013	001	CBOD 5 day	30D Conc	10	20.625	7/1/2013
July 2013	001	CBOD 5 day	30D Qty	34.1	164.652	7/1/2013
July 2013	001	Total Suspended Solids	7D Conc	18	373.	7/8/2013
July 2013	001	Total Suspended Solids	7D Qty	61.4	3245.51	7/8/2013
July 2013	001	CBOD 5 day	7D Conc	15	71.5	7/8/2013
July 2013	001	CBOD 5 day	7D Qty	51.1	618.143	7/8/2013

Flow Data for Little Jelloway Creek WWTP between 4/1/2013 and 9/30/2013

	Date	Flows (MGD)
Ten Highest Flows	7/10/2013	2.301
	7/11/2013	2.212
	7/9/2013	1.978
	4/12/2013	1.846
	4/11/2013	1.747
	4/13/2013	1.726
	4/29/2013	1.514
	7/12/2013	1.496
	4/28/2013	1.439
	6/13/2013	1.412
Average Flow Rate		1.035