



ROY COOPER  
Governor

MICHAEL S. REGAN  
Secretary

LINDA CULPEPPER  
Director

November 14, 2019

**CERTIFIED MAIL 7018 1830 0001 8037 0267**  
**RETURN RECEIPT REQUESTED**

Steven Drew, Water Resources Director  
City of Greensboro  
2602 S Elm-Eugene St  
Greensboro, NC 27406-9787

Subject: **NOTICE OF VIOLATION (NOV-2019-PC-0728) &  
Intent to Assess CIVIL PENALTIES**  
T.Z. Osborne WWTP  
NPDES Permit NC0047384  
Guilford County

Dear Mr. Drew:

The North Carolina Division of Water Resources has reviewed data submitted on your Discharge Monitoring Report (DMR) dated August 2019. The data indicates that on August 7, 2019, the City of Greensboro had a discharge of 1,4 Dioxane of 957.5 ug/L. This discharge represents a violation of North Carolina water quality standards as well as conditions of NPDES WW Permit No. NC0047384. The violations are enumerated below.

**Violations of North Carolina Water Quality Standards**

Based on the review of the provided DMR data, there was a violation of North Carolina regulation 15A NCAC 02B .0211(12), which states:

*“Oils, deleterious substances, colored, or other wastes: only such amounts as shall not render the waters injurious to public health, secondary recreation, or to aquatic life and wildlife, or adversely affect the palatability of fish, aesthetic quality, or impair the waters for any designated uses.”*

**Violations of NPDES Permit NC0047384 Conditions**

Review of the discharge data for August 7, 2019 also indicates a violation of NPDES permit NC0047384 Part II Section E, condition (9)(a) and Part IV, Section C(2)(c) listed below.



North Carolina Department of Environmental Quality | Division of Water Resources  
512 North Salisbury Street | 1650 Mail Service Center | Raleigh, North Carolina 27699-1650  
919.707.9000

Part II, Section E(9)(a), Noncompliance Notification

*The Permittee shall report by telephone to either the central office or the appropriate regional office of the Division as soon as possible, but in no case more than 24 hours or on the next working day following the occurrence or first knowledge of the occurrence of any of the following:*

*a. Any occurrence at the water pollution control facility which results in the discharge of significant amounts of wastes which are abnormal in quantity or characteristic, such as the dumping of the contents of a sludge digester; the known passage of a slug of hazardous substance through the facility; or any other unusual circumstances.*

Part IV, Section C(2)(c), Municipal Control of Pollutants from Industrial Users

*The Permittee shall investigate the source of all discharges into the POTW, including slug loads and other unusual discharges, which have the potential to adversely impact the Permittee's Pretreatment Program and/or the operation of the POTW.*

*The Permittee shall report such discharges into the POTW to the Director or the appropriate Regional Office. Any information shall be provided orally within 24 hours from the time the Permittee became aware of the circumstances. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the discharge; the investigation into possible sources; the period of the discharge, including exact dates and times; if the discharge has not ceased, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance*

This Notice of Violation/Intent to Issue Civil Penalty is being issued for the noted violations of North Carolina water quality standards (15A NCAC 2B .0100 and .0200) and the facility's NPDES Permit (NC0047384). Pursuant to G.S. 143-215.6A, a civil penalty of not more than twenty-five thousand dollars (\$25,000.00) may be assessed against any person who:

*(1) Violates any classification, standard, limitation, or management practice established pursuant to G.S. 143-214.1, 143-214.2, or 143-215, or*

*(2) Is required but fails to apply for or to secure a permit required by G.S. 143-215.1, or who violates or fails to act in accordance with the terms, conditions, or requirements of such permit or any other permit or certification issued pursuant to authority conferred by this Part, including pretreatment permits issued by local governments and laboratory certifications.*

If you wish to provide additional information regarding the noted violations, request technical assistance, or discuss overall compliance please respond in writing within thirty 30 calendar days after receipt of this Notice. A review of your response will be considered along with any additional information provided when determining whether a civil penalty may be assessed.

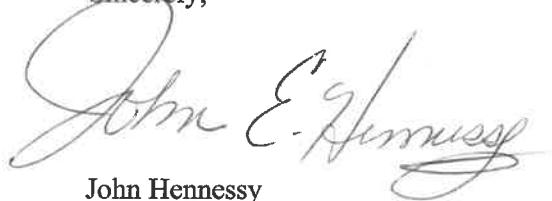
November 14, 2019

Page 3 of 3

Remedial actions should have already been taken to correct this problem and prevent further occurrences in the future. The Division of Water Resources may pursue enforcement action for this and any additional violations of State law.

If you should have any questions, please do not hesitate to contact me at 919-707-3615.

Sincerely,

A handwritten signature in cursive script that reads "John E. Hennessy". The signature is written in black ink and is positioned above the printed name and title.

John Hennessy  
Compliance and Expedited Permitting Supervisor

cc: Lon Snider, WSRO  
Jenny Graznak, WSRO

