

Inspection Findings/Compliance Review:

At the time of the inspections, the following observations, findings and/or comments were noted:

1. The general operation and maintenance of the treatment plant appeared to be satisfactory. The final effluent at Outfall 001 was clear with no observable adverse impacts to the receiving stream. We understand, however, that the gear drive in the # 2 clarifier failed within the past week. The facility shall ensure that immediate actions are undertaken to repair this essential treatment component.
2. The evaluation noted some discrepancies between the influent and effluent flow meters readings. It was requested that the facility evaluate the calibration of the meters to determine whether the differences were the result of in-plant water uses, e.g. filter press.
3. The evaluation noted that the CSO consolidation improvements at OFA1, authorized pursuant to PTI No. 644361, were nearing completion. The new CSO structure consists of a bar screen, flow meter, and sampling and control equipment. As evident in the attached pictures, the City's electrical contractor was on site to complete the work on the monitoring system.
4. An overview of the facility's laboratory protocols was provided by Ms. DelGenio. Analytical procedures evaluated included pH, Dissolved Oxygen, cBOD₅, Suspended Solids, Residual Chlorine, and Ammonia-N. Based on the review, the facility committed to undertake the following actions:
 - Update the facility's laboratory procedures to ensure that they are current and conform to accepted US EPA guidelines. Examples of such methods are available online at:

<http://www.epa.gov/waterscience/methods/method/>
 - Update quality assurance/quality control (QA/QC) procedures, where necessary, to ensure that analytical data generated in the laboratory are both accurate and precise. QA/QC procedures should include the development of control charts and calibration curves.

A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period July 2008 through January 2009 indicates violations of the final effluent limitations at Outfall 001. The specific instances of non-compliance are as follows:

Mayor James Melfi and Council
City of Girard
March 6, 2009
Page 3

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2008	001	Chlorine, Total Residual	1D Conc	0.019	.1	10/31/2008
December 2008	001	Mercury, Total	30D Qty	0.0007	.0009	12/1/2008
August 2008	001	Oil and Grease	1D Conc	10	10.8	8/20/2008
December 2008	001	Oil and Grease	1D Conc	10	11.4	12/19/2008
November 2008	001	Total Suspended Solids	30D Conc	30	30.2	11/1/2008
December 2008	001	Total Suspended Solids	30D Conc	30	32.2	12/1/2008
January 2009	001	Total Suspended Solids	30D Conc	30	32.4	1/1/2009
January 2009	001	Total Suspended Solids	7D Conc	45	66.3	1/1/2009
January 2009	001	Total Suspended Solids	7D Qty	852	1373.5	1/1/2009

Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to \$10,000 per day of violation. It is requested that the City submit a written response to this office documenting the actions taken or proposed to address the above violations and/or deficiencies. Your response shall include dates for initiation and completion of the actions.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

Attachments: Pictures

cc: Howard Zickefoose, Girard WWTP

File: Public/Girard WWTP/PC







