



**Environmental
Protection Agency**

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

October 5, 2011

RE: TRUMBULL COUNTY
NILES WWTP
NPDES PERMIT NO. OH0026743
OHIO EPA PERMIT NO. 3PD00036

Mayor and Council
City of Niles
34 West State Street
Niles, Ohio 44446

Dear Mayor and Council:

Ohio EPA performed a Compliance Evaluation Inspection on September 29, 2011, at the above-referenced facility. The undersigned represented Ohio EPA and Mr. Randy Fabrizio represented the City of Niles. The inspection was performed to evaluate the operational performance of the treatment system and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The 6.2 MGD treatment facility currently serves a population of approximately 27,180, and consists of influent screening, grit removal, oxidation ditches with integral clarifiers, chlorine disinfection, and dechlorination. Waste sludge from the facility is gravity thickened, anaerobically digested, and mechanically dewatered utilizing a belt filter press.

At the time of the inspection, the general operation and maintenance of the treatment plant appeared to be satisfactory. During the inspection, the following observations and/or deficiencies were noted:

1. Part II, V of the City's NPDES permit requires that outfall signs be erected at all outfalls no later than four (4) months after the effective date of the permit, which was March 1, 2008. During the inspections, signs were not observed at any of the outfalls.
2. The mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
3. Influent and effluent samples must be maintained at a temperature of $0^{\circ}\text{C} \leq 6^{\circ}\text{C}$. During the inspection, it was noted that influent and effluent samples were being refrigerated at temperatures higher than 10°C .

4. Floating solids and debris were observed in the chlorine contact chamber.
5. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the Mahoning River.
6. Mr. Fabrizio indicated that the facility currently has no issues meeting the effluent limits defined in its NPDES permit.
7. Discussions with Mr. Fabrizio revealed that the facility is still impacted by excessive inflow and infiltration (I/I) in the collection system. This is evident with the multiple treatment plant bypasses (Station 602) that have been reported since the last inspection. We understand that the City is continuing to evaluate and address sources of the extraneous I/I. The efficiency of the wastewater treatment plant is dependent upon the effective operation and maintenance of the collection system.
8. Construction of the 500,000-gallon flow equalization basin (PTI No. 714304) on Fairlawn Avenue continues to progress.

A review of the facility's Electronic Discharge Monitoring Report (eDMR) data received by Ohio EPA for the period March 2010 – August 2011 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2010	001	00552	Oil and Grease, Hexane	1D Conc	10	99.4	7/19/2010
March 2011	001	00530	Total Suspended Solids	7D Qty	1057	1094.89	3/8/2011

The facility's current NPDES permit expires on January 31, 2012. This office received a permit renewal application on April 29, 2011. Once the new NPDES permit is drafted and issued, Ohio EPA advises that the permittee read through it carefully, as there will be a number of changes made to it.

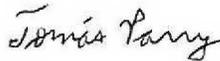
One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with *Escherichia coli* (*E. coli*) monitoring limits. The permittee will be given a 12-month conversion period to transition from meeting fecal coliform limits to meeting *E. coli* limits. Monitoring requirements for *E. coli*, and any other new parameters, will be described in the new permit.

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Please submit to this office, within 14 days' receipt of this letter, written documentation explaining how the deficiencies outlined in this letter have been or will be addressed. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that past or present instances of noncompliance are subject to future legal enforcement action pursuant to Chapter 6111 of the Ohio Revised Code.

Should have any questions, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Enclosures: photographs

Cc: Randy Fabrizio, Niles WWTP Superintendent

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