



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 23, 2009

**RE: ASHTABULA COUNTY
CITY OF ASHTABULA WWTP
NPDES PERMIT NO. OH0023914
OHIO EPA PERMIT NO. 3PE00002**

Anthony Cantagallo, City Manager
City of Ashtabula
4717 Main Avenue
Ashtabula, Ohio 44004

Dear Mr. Cantagallo:

On November 18 - 19, 2009, a limited-scope inspection was conducted at the above referenced facility by the undersigned. The City was represented by Mr. Michael Mearini, Interim Superintendent. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the NPDES permit.

At the time of the inspection, the following observations and comments were noted:

1. We understand that Mr. Mearini has been in the position of Interim Superintendent since January 2009. Ohio Administrative Code 3745-7-02 (E) states that the "director may approve an operator with a valid class III certificate to be the operator of record of a class IV public water system or class IV treatment works for a period no longer than two years, if the class III operator has applied for and received approval to take a class IV examination..." Since he does not yet hold a Class IV license, a letter requesting an extension to December 2010 must be submitted by the City.
2. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. An observation of the plant effluent revealed the discharge to be visually clear with no signs of floating debris, oil & grease, or excessive foam.
3. The automatic samplers are not collecting flow-proportioned composite samples as required by the permit. The former plant superintendent, Randal Ohly, was previously informed of this on-going deficiency.
4. We understand that the facility intends to convert its chemical feed system to Sodium Aluminate for Phosphorus removal. Please provide notification to this office upon startup and completion of the conversion.

ANTHONY CANTAGALLO, CITY MANAGER
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5. Ohio EPA has not received a complete and approvable application for the requested Mercury Variance. The application was required to have been submitted by Mr. Ohly no later April 1, 2008. We understand that Mr. Mearini has been working with GGJ, Inc. to finalize the required paperwork.

A review of the self-monitoring reports received by Ohio EPA for the period, September 2008 - November 2009, indicates violations of the terms and conditions of your NPDES permit. The specific instances of non-compliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2008	001	Mercury, Total (Low Le	30D Conc	12	14.3	9/1/2008
March 2009	001	Total Suspended Solids	7D Qty	1363	1437.54	3/8/2009

It is requested that the City submit a written response to this office documenting the actions taken or proposed to address the above items. Your response shall include dates for initiation and completion of the actions. Please be advised that violations of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code.

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:bo

pc: Michael Mearini, Interim Plant Superintendent

File: Municipal/ P&C /City of Ashtabula WWTP