



Environmental
Protection Agency

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

June 20, 2011

RE: CAMPBELL POTW
NPDES PERMIT NO. 3PD00008
FY 2011 CEI

Board of Mahoning County Commissioners
21 West Boardman Street
Youngstown, OH 44503

Ladies and Gentlemen

On June 16, 2011, this writer conducted an unannounced inspection of the Campbell POTW. The intent of the inspection was to evaluate operations and maintenance of the plant. The compliance record regarding the NPDES Permit and the 2008 Consent Agreement was also reviewed. Mike Szenborn represented the county during the inspection.

Observations:

Observations made during the inspection are as follows.

1. The rotary screen for the Murray St. sewer was offline due to an interruption of the water supply to the screening device. The water supply will need to be repaired before the screen can be placed back into operation. The rotary screen must be brought on line as soon as possible, but no later than June 30, 2011.
2. Two pumps were in need of maintenance due to leaking seals. It was understood that the pumps were a sludge return pump and an influent pump for the Wilson Avenue pump station. It is possible that the Wilson Avenue pump station may also have been leaking sewage. All pumps should be repaired as soon as possible, but no later than June 30, 2011.
3. The clarifiers were covered with a significant layer of scum and sludge. Pin floc was also apparent overflowing the weirs. It was recommended that the sludge age in the plant be monitored and the sludge adjusted per the operations and maintenance manual. The sludge age can then be adjusted as necessary to operate the plant without scum forming on the surface of the clarifiers. It was also recommended during the inspection that the clarifiers be taken offline at low flows to clean and repair any components as necessary.
4. The fine screening device for the Wilson Avenue pump station was offline at the time of the inspection. It was understood that the device was inoperable and in need of repair or replacement. Wastewater was passing through a manual bar screen; however, the bar screen is insufficient to prevent rags and other debris from entering the plant. The fine screen must be repaired or replaced as soon as possible to prevent debris from interfering with plant operations.

5. Debris that has passed through the plant had accumulated in the chlorine contact tank. The debris could interfere with the effectiveness of the disinfection system. As discussed with Mr. Szenborn, the floating debris must be immediately removed from the chlorine contact tank. It was also discussed that after the disinfection season, the disinfection system should be taken offline in order to clean any sludge from the system.

Be advised that the debris in the chlorine contact tank could be the result of inadequate screening in the plant. The county must evaluate the existing screening and grit removal system for the plant and make any improvements necessary to prevent the migration of debris through the plant.

6. The sludge holding tank remains inoperable. This is the third inspection report that included a comment about the sludge holding tank. It has been stated by the county that the residue at the bottom of the tank had hardened and that the lid on the tank was immovable. The county must address the problems with the sludge holding tank.
7. The aeration tank had good color indicating a healthy population of microbes necessary to treat the organic material and ammonia in the wastewater.

Compliance with the Consent Order:

The October 22, 2008 Consent Order includes a provision that the Wilson Avenue overflow must be eliminated no later than June 30, 2013. In addition, upgrades to the POTW necessary to eliminate the Wilson Avenue overflow are to be completed no later than June 30, 2012. Prior to initiating the construction activities, the upgrades must be proposed and approved by the Director of Ohio EPA.

The schedule in the consent order only provides one more year to design and build all plant upgrades necessary to physically remove the overflow at Wilson Avenue pump station. The county must immediately initiate design of any plant upgrades in order to have a chance at meeting the deadlines in the Consent Order. Failure to meet the deadlines in the Consent Order will be considered contempt and will be addressed by the Attorney General's Office through the Mahoning County court system.

Compliance with the NPDES Permit:

NPDES Permit Limits

A review of the compliance record for the Campbell POTW was conducted for the time period covering January 2010 through April 2011. No limit or frequency violations were identified during the review period.

NPDES Permit Compliance Schedule

In Part 1.C, Item 5, the county is required to submit annual progress reports to Ohio EPA regarding progress toward eliminating the Wilson Avenue overflow station. The reports are to be submitted to this office no later than August 1st of each year. To date, this writer is not aware

that this office received a progress report for 2010. In addition, a second progress report must be submitted to this office no later than August 1, 2011.

Be advised that the Wilson Avenue overflow is an unpermitted outfall. Any discharge of wastewater through the outfall could be considered a violation of the NPDES Permit and Ohio Revised Code (R.C.) 6111.07. It is important that the overflow be eliminated in accordance with the timeline established in the Consent Order and in accordance with Part I.C, Item A.3 of the permit.

300 Station – SSO Monitoring

The 300 station in the NPDES permit is intended for the county to report any overflows in the collection systems that are tributary to the POTWs. Each month, any overflows are to be reported on the eDMR reports to Ohio EPA in the event any overflow incidents had occurred.

The Wilson Avenue overflow is considered a collection system overflow and should be reported on the 300 Station form when the bypass is activated. In a March 31, 2011 letter, the county reported three overflow events at the Wilson Avenue overflow station during 2011. However, the events did not appear on the eDMR 300 Station forms. As previously indicated, any time the Wilson Avenue overflow is activated, an event must be reported in eDMR at the 300 station.

Summary:

Following is a summary of actions discussed during the inspection to address concerns noted above.

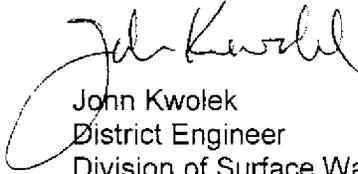
1. The rotary screen for the Murray Street sewer must be brought on line as soon as possible, but no later than June 30, 2011.
2. All pumps should be repaired as soon as possible, but no later than June 30, 2011. Any repairs must be entered into the maintenance log for the plant for future inspection
3. The county must start to monitor sludge age in the plant and adjust the sludge age per the operations and maintenance manual. The sludge age can then be adjusted as necessary to enable operation of the plant without scum forming on the surface of the clarifiers. It is also recommended that one clarifier at a time be taken offline at low flows to clean and repair any components as necessary. Wastewater flow through the plant should be diverted to the existing equalization tank as necessary to prevent hydraulic and solids overload of the one clarifier that will remain online during cleaning operations.
4. The screening device for the Wilson Avenue pump station must be repaired or replaced as soon as possible to prevent debris from interfering with plant operations.
5. Debris that has passed through the plant had accumulated in the chlorine contact tank must be immediately removed. The disinfection system should be taken offline after the disinfection season in order to clean any sludge from the bottom of the chlorine contact tank.

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6. The county must evaluate the existing screening and grit removal system for the plant and make any improvements to the system necessary to prevent the migration of debris through the plant.
7. The sludge holding tank remains inoperable. The county must address the problems with the sludge holding tank.

You may contact this writer at (330) 963-1251 to discuss any questions you may have.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Bob Lyden, Mahoning County Sanitary Engineer
Mike Szenborn, Campbell POTW Superintendent