



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 19, 2010

RE: PUBLIC WASTEWATER
CAMPBELL WWTP
NPDES PERMIT NO. 3PD00008
2010 CEI

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

Dear Gentlemen:

On January 6, 2010, this writer conducted an unannounced Compliance Evaluation Inspection of the Campbell WWTP. The intent of the inspection was to assess operations and maintenance at the POTW and to assess compliance with NPDES Permit No. 3PD00008*KD. The 2008 Consent Order was also reviewed for compliance with sections applicable to the Campbell POTW. Representing the county during the inspection was Guy Maiorana.

Observations

The condition of the treatment system was considered satisfactory at the time of the inspection. Following are observations made during the inspection.

1. During the inspection, the oxidation ditches had good color and good mixing.
2. The clarifiers did have a scum on their surface, and the weir troughs did have a significant deposit of sludge and algae at the time of the inspection. Mr. Maiorana stated that the weir troughs were in need of cleaning.
3. According to Mr. Maiorana, all three pumps at the Wilson Avenue pump station were operational at the time of the inspection. The county still conducts periodic flow tests to check the capacity of the pumps. Mr. Maiorana stated that each pump is checked multiple times throughout the year to ensure that the maximum amount of wastewater passes through the treatment plant before bypassing directly to the Mahoning River through the Wilson Avenue overflow.
4. At the time of the inspection, the sludge holding tank remained unusable. The floating lid is immovable and is in need of repair. This situation with the holding tank was identified during the 2008 inspection of the plant.

According to Mr. Maiorana, the county has been in the process of cleaning the tank in order to better evaluate the condition. It was determined that the sludge at the bottom of the tank is primarily lime sludge from the Campbell water treatment plant. The water plant no longer discharges lime sludge to the sanitary sewers; however, the lime sludge currently in the holding tank is from past practices. Fortunately, the county has other options for processing sludge which minimizes the impact of the holding tank on the county's ability to dispose of sludge.

Mr. Maiorana stated that the county is periodically bleeding the lime sludge out of the holding tank as plant conditions permit. It is anticipated that the tank will be cleaned and evaluated by the summer of this year. The county should take all steps necessary to repair the tank as soon as possible.

5. Mr. Maiorana stated that the county continues to use the "tea cups" as a means to at least partially treat wastewater during high flow conditions. It is understood by this writer that when the equalization tank is $\frac{3}{4}$ full, flow is diverted to the "tea cups" for treatment. The discharge from the tea cup system is then blended with the secondary effluent from the clarifiers prior to disinfection.

It is understood that the frequency of use of the tea cup system has decreased recently. The decrease could be the result of storm sewer maintenance undertaken by Campbell in the past two years, storm water separation projects undertaken in the past couple of years in the city of Campbell, or it could be the result of reduced storm intensity in the past two years. Though the cause for the decreased use of the "tea cups" is unclear at this time, it is a positive indication that the county and city may be making progress at reducing inflow and infiltration to the sanitary sewer system.

Recent studies by the county and city identified several significant connections between the storm and sanitary sewers on Wilson Avenue and Hyatt Avenue. The discharge of storm water into the sanitary sewers places a significant hydraulic burden on the sanitary system and on the wastewater treatment plant. This hydraulic burden increases the possibility of basement flooding and increases operational costs for the county. It also is the cause for periodic bypasses of untreated sewage through the Wilson Avenue overflow structure.

Mr. Maiorana stated that the county and city will be working to eliminate the connections. It is critical that the cross-connections be eliminated as soon as possible. The county is under a Consent Order to physically eliminate the Wilson Avenue bypass structure no later than June 2013. The consent order specifically states:

"Mahoning County shall prepare a report and plan for the Campbell WWTP specifically identifying actions necessary to address the Wilson Avenue overflow, located at 4200 Wilson Avenue, Campbell, OH. The report and plan shall be implemented by July 1, 2009 with work completed by June 30, 2012. Mahoning County shall provide notice to Ohio EPA of completion of each work element contained in the plan within thirty days of completion of that element. The Wilson Avenue overflow shall be physically eliminated no later than June 30, 2013"

Ohio EPA received the report and plan in a June 29, 2009 letter from Mr. Joe Warino. The letter stated that it was anticipated that the inflow and infiltration removal projects will be completed no later than the spring of 2010. Following the separation projects, structural modifications of the treatment plant requiring detailed engineering design may also be required in order to safely eliminate the overflow. In accordance with the

Consent Order, all of the activities necessary to eliminate the overflow must be completed no later than June 30, 2012 so that the system can be monitored prior to physically eliminating the bypass structure by June 30, 2013.

Operator of Record

Mr. Maiorana is the operator of record for the Campbell and the Boardman POTWs. The Campbell POTW is a Class III plant and the Boardman POTW is a Class IV plant. It is the understanding of this writer that Mr. Maiorana also is the operator of record at the Damascus, Diehl Lake, and New Middletown POTWs. Diehl Lake is identified in its permit as a Class I plant, and Damascus and New Middletown are identified as Class II plants.

Ohio Administrative Code 3745-07-04(C) requires that the operator of record be physically present at a Class III and Class IV plant a minimum of 40 hrs. per week. Operators of record overseeing operations at Class II plants must be physically present at the plants 5 days per week for a minimum of 20 hrs. per week. By assigning responsibility for five plants to Mr. Maiorana, it is impossible for the county to comply with Ohio Administrative Code 3745-07-04(C). The county must take the necessary steps to either re-organize county personnel to assign operators of record to each POTW in accordance with Ohio Administrative Code 3745-07-04(C), or hire new employees from outside the current sanitary engineer's office in order to cover the attendance requirements in Ohio Administrative Code 3745-07-04(C).

The county must provide a response to this letter stating actions that will be taken to address this requirement of Ohio Administrative Code 3745-07-04(C) and a schedule for having in place the necessary personnel. The response should be submitted to this office no later than February 19, 2010.

NPDES Permit Compliance Review

Limit Violations

A review of the compliance record for the Campbell POTW was conducted for the time period covering January through December 2009. Following are limit violations identified during the review period.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2009	001	Total Suspended Solids	30D Qty	216	354.484	2/1/2009
February 2009	001	Total Suspended Solids	7D Conc	45	85.6666	2/22/2009
February 2009	001	Total Suspended Solids	7D Qty	324	1180.91	2/22/2009
October 2009	001	Oil and Grease, Total	1D Conc	10	11.	10/15/2009
November 2009	001	Oil and Grease, Total	1D Conc	10	12.2	11/2/2009

Be advised that the limit violations of the NPDES Permit constitute violations of the Ohio Revised Code (ORC) 6111.07.

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Bypass Events

The city reported bypasses through the Wilson Avenue bypass structure on March 8, 2009 and June 17, 2009. The discharge of wastewater through the structure constitutes a violation of ORC 6111.04

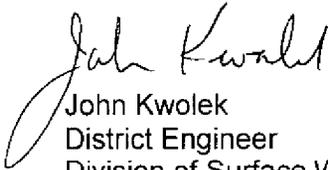
Response Requested

This writer requests a response to this letter to include the following information. The response should be provided to this office no later than February 19, 2010.

- I. Include an update to the June 29, 2009 letter from Mr. Warino to indicate if the original schedule to complete the storm water separation projects in Campbell by the spring of 2010 is still accurate (Item 5 above).
- II. Per Item 6 above, provide a plan to ensure compliance with the staffing requirements in OAC 3745-07-04. As stated above, the city is unable to comply with the regulation by having Mr. Maiorana as the operator of record for five different treatment plants.

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

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc. Mayor and Council, City of Campbell
Bob Lyden, Mahoning County Sanitary Engineer
Mr. Guy Maiorana, Superintendent, Campbell POTW

File: Public/Mahoning Campbell WWTP/Permit and Compliance