



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

May 23, 2008

RE: TRUMBULL COUNTY  
CITY OF HUBBARD WWTP  
NPDES PERMIT NO. OH0025810  
OHIO EPA PERMIT NO. 3PD00028

Mayor and Council  
City of Hubbard  
220 West Liberty Street  
Hubbard, Ohio 44425

Dear Mayor and Council

This letter is a follow-up to the April 22, 2008 meeting and inspection at the City of Hubbard Wastewater Treatment Plant by the undersigned. The City was represented by Messrs. Albert Patrick, Bob Toth, Pat Camuso, and Andrew Petrella. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

**Inspection Findings/Compliance Status**

The wet-stream processes of the 2.1 MGD treatment plant consist of mechanical bar screening, aerated grit removal, activated sludge treatment process, secondary clarification, chlorine disinfection, dechlorination, and post aeration. The plant discharges to Little Yankee Creek via Outfall 001. Waste activated sludge is presently processed thru an aerobic storage tank and belt filter press. The dewatered sludge is currently being hauled to the City of Warren WWTP's "Nature's Blend" biosolids facility for further processing.

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

1. All treatment units appeared to be operating satisfactorily. The final effluent was clear with no observable adverse impact to Yankee Run.
2. A new flow influent flowmeter had been installed at the plant headworks. Additionally, new control units were noted for the chlorination and dechlorination systems.
3. It was noted that the facility laboratory performed very well on the 2007 DQR-QA Study. All of the reported constituents were noted as "Acceptable".
4. It was noted that the facility continues to experience problems due to excessive inflow and infiltration (I/I). Correspondence from ms consultants, inc. indicates that the City is developing a 5-year capital improvements program to address sources of extraneous I/I in the collection system. The efficiency of wastewater treatment at the treatment plant depends strongly on the design and performance of the collection system. High levels of I/I increase the hydraulic load on the treatment plant, which can reduce treatment efficiency, can exceed the capacity of components within the treatment process, and, in extreme situations, wash out the biological organisms that treat the wastewater. Hence, removal of extraneous "clean water" from the collection system will go a long way toward protecting the substantial investment that the City has made at the treatment plant.

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A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period January 2007 through April 2008 indicate violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2007	001	Oil and Grease, Hexane	1D Conc	10	21.	7/11/2007
July 2007	001	Dissolved Oxygen	1D Conc	6.0	5.54	7/20/2007
November 2007	001	Oil and Grease, Hexane	1D Conc	10	13.	11/16/2007
February 2008	001	Total Suspended Solids	7D Qty	239	418.575	2/1/2008

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.

**Summary/Conclusion**

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. 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.

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

File: Public/Hubbard/PC