



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 22, 2009

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:

Please find enclosed a copy of the laboratory data compiled by Ohio EPA for the samples collected on September 14-15, 2009 at the City of Hubbard Wastewater Treatment Plant. During the course of the visit, 24-hour composite and grab samples were collected of the plant effluent at Outfall 001. In addition, upstream and acute mixing zone samples were collected in Little Yankee Run. The samples were analyzed by Ohio EPA for the routine permit parameters, organic constituents, and toxicity. A follow-up meeting was held on October 27, 2009 with Messrs. Lanier Epperson, Bob Toth, and Andrew Petrella to discuss the inspection findings.

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. Waste activated sludge is processed through an aerobic storage tank and belt filter press prior to landfilling or hauling to another facility for additional processing.

During the October 27th meeting, the following items were noted and discussed with the gentlemen:

1. The overall operational performance of the treatment plant was satisfactory. However, the existing bar screen appeared to be in need of significant repair and /or replacement. Given the age, type, and performance of the unit, it was recommended that the City pursue replacement.
2. The analytical data compiled by Ohio EPA indicate that the plant discharge was in compliance with the respective NPDES permit effluent concentration limitations. The bioassay data indicate that the effluent was not acutely toxic to the test organisms, *Ceriodaphnia dubia* and *Pimephales promelas*. Screening bioassays are utilized by Ohio EPA to determine if an effluent is acutely toxic to the test organisms and to indicate if more extensive evaluations should be conducted to determine the persistence of toxicity. The current evaluation did not address the possibility of chronic toxicity.

3. Ohio Administrative Code (OAC) 3745-07 requires that both the wastewater treatment plant and the collection system be under the responsible charge of **certified operator**. While Mr. Petrella fulfills the legal requirement for the treatment plant, Mr. Pat Camuso does not hold an operator's certificate for the collection system. In response to this issue, it was stated that supervision of the collection system would be placed under Mr. Petrella. Please forward a copy of the revised table of organization to this office.

4. We understand that Trumbull County has awarded a contract to Lynn, Kittinger, & Noble for the design of the sanitary sewer extension to serve the Kurmont Heights area. This sewer will eliminate a declared sewage nuisance area within Hubbard Township.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, May 2008 - November 2009, 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
January 2009	001	Copper, Total Recoverable	30D Qty	0.14	.17413	1/1/2009
March 2009	001	Oil and Grease, Hexane	1D Conc	10	25	3/4/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.021	.05	8/6/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.021	.05	8/13/2009
May 2008	001	Fecal Coliform			AK	5/20/2008
July 2008	001	Fecal Coliform			AK	7/15/2008

In addition to the above, the evaluation noted the following headworks bypasses (Station 602):

602	Bypass Volume	MGAL	2/8/2008	1
602	Bypass Volume	MGAL	3/5/2008	0.7
602	Bypass Volume	MGAL	3/8/2009	1

Based on the above, it would appear that the facility is still impacted by excessive inflow and infiltration (I/I) in the collection system. We understand that the City is continuing to evaluate sources of the extraneous I/I. The efficiency of the wastewater treatment plant is dependent of the effective maintenance of the collection system.

In addition to the above, our review of the facility's data reporting procedures noted the following:

- The facility's DMRs are currently being submitted and certified by Mr. Tim Walker. While eDMR allows permitted facilities to enter, electronically sign, and submit DMRs, federal and state regulations specify who can legally sign and

certify the reports. Pursuant to the regulations, DMRs can **only** be signed and certified by the principal elected official, i.e. mayor, or by a duly authorized representative of said official. Pursuant to Title 40 Code of Federal Regulations (40 CFR) 122.22 (b):

A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,

(3) The written authorization is submitted to the Director.

The Personal Identification Number, or PIN, uniquely identifies and serves as the **electronic signature** of the responsible or duly-authorized official. Based on the above requirements, the eDMRs must be pinned by Mr. Petrella.

Under the eDMR program, the PIN holder can delegate individuals, such as lab personnel, with the privilege to view, create and edit DMRs...but not submit eDMR data. These individuals must have an eBusiness Center account, but do not need a PIN. Since they do not have the privilege of actually certifying the data, the law does not require them to have a PIN. Once these users perform the data entry or review the data, the DMR is saved and the PIN holder can log on and submit the DMR.

- The following DMR data (2008-2009) appear to have been reported using the wrong units (e.g. mg/l):

Station	Parameter	Units	Date	Reported Value
001	Nickel, Total Recoverable	ug/l	3/7/2008	0.032
001	Zinc, Total Recoverable	ug/l	3/7/2008	0.032
001	Zinc, Total Recoverable	ug/l	5/7/2008	0.051
001	Zinc, Total Recoverable	ug/l	9/3/2008	0.046
001	Zinc, Total Recoverable	ug/l	6/3/2009	0.074
001	Zinc, Total Recoverable	ug/l	7/1/2009	0.041
001	Lead, Total Recoverable	ug/l	6/4/2008	0.006
001	Copper, Total Recoverable	ug/l	3/7/2008	0.004

Mayor and Council
City of Hubbard
December 22, 2009
Page 4

Station	Parameter	Units	Date	Reported Value
001	Copper, Total Recoverable	ug/l	5/7/2008	0.006
001	Copper, Total Recoverable	ug/l	9/3/2008	0.011
001	Copper, Total Recoverable	ug/l	7/1/2009	0.014
601	Chromium, Total Recoverable	ug/l	3/7/2008	0.003
601	Zinc, Total Recoverable	ug/l	3/7/2008	0.068
601	Lead, Total Recoverable	ug/l	6/4/2008	0.001
601	Copper, Total Recoverable	ug/l	3/7/2008	0.023
901	Nickel, Total Recoverable	ug/l	3/7/2008	0.0026
901	Zinc, Total Recoverable	ug/l	3/7/2008	0.022
901	Lead, Total Recoverable	ug/l	6/4/2008	0.002

The corrected eDMRs should be resubmitted as expeditiously as practicable. Questions regarding eDMR submission should be directed to James Roberts at (614) 644-2054 or via e-mail: James.Roberts@epa.ohio.gov.

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 the inspection, please contact this office.

Respectfully,


Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

Enclosures: Analytical Data

cc: Andy Petrella, Hubbard WWTP