



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 12, 2010

RE: PUBLIC WASTEWATER
MEANDER WWTP
NPDES PERMIT NO. 3PK00011
2010 CEI

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

Gentlemen:

On January 27, 2010, this writer conducted an unannounced Compliance Evaluation Inspection (CEI) of the Meander Wastewater Treatment Plant (WWTP). The intent of the inspection was to determine the condition of the treatment plant and to review the compliance record since the previous inspection.

Observations

Following are observations made during this inspection.

1. The condition of the treatment system was satisfactory at the time of the inspection. Both treatment stages and clarifiers were on-line.
2. A pin floc was apparent in effluent from both clarifiers and from the polishing clarifier. However, the final effluent from the polishing filters was clear and had no color or odor at the time of the inspection. The pin floc identified at the clarifiers was assumed to be the result of construction activities associated with the new grit removal system. Flow to the wastewater treatment plant was retained in the influent wet well during the installation of new gates in the new grit building. Following completion of the installation, the pump station was delivering the retained wastewater to the treatment plant at a higher than normal rate of flow. Plant personnel were monitoring the plant for any temporary compliance issues.
3. Construction of the new grit removal system is near completion. Mr. DeNiro indicated that the grit system should be operational by March 2010.
4. All treatment processes appeared to be operational at the time of the inspection. Because of the winter season, the disinfection system was off-line. The county must evaluate the disinfection system for replacement. The system has been properly maintained since installation; however, it is near its design age and has created compliance problems in the past.

5. Mr. DeNiro provided the preventive maintenance report for the oxygen delivery system. The report showed that the annual preventive maintenance inspection of the oxygen delivery system was completed in October 2009.
6. The treatment plant has no back-up power that will enable the plant to operate during power outages. The county must provide an alternative power source to the plant. Please provide a response indicating the actions that will be taken and a schedule for completing the installation of the secondary power source.

Compliance Review

A review of the compliance record for the Meander WWTP was made for the months covering November 2008 through December 2009. Following is a list of permit limit violations identified for the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
6/1/2009	Nitrogen, Ammonia	30D Conc	2.1	5.95	12/1/2007
6/1/2009	Nitrogen, Ammonia	7D Conc	3.15	6.06	12/1/2007
6/1/2009	Nitrogen, Ammonia	30D Qty	31.8	72.5	12/1/2007
6/1/2009	Nitrogen, Ammonia	7D Qty	47.7	47.7	12/1/2007
6/8/2009	Nitrogen, Ammonia	7D Conc	3.15	6.8	12/8/2007
6/8/2009	Nitrogen, Ammonia	7D Qty	47.7	74.2	12/8/2007
6/15/2009	Nitrogen, Ammonia	7D Qty	47.7	68.3	12/15/2007
6/15/2009	Nitrogen, Ammonia	7D Conc	3.15	6.55	12/22/2007
6/22/2009	Nitrogen, Ammonia	7D Conc	3.15	4.41	1/8/2008
6/22/2009	Nitrogen, Ammonia	7D Qty	47.7	69.05	1/8/2008

It is the understanding of this writer that the cause of the violations was unknown at the time. Be advised that the limits violations constitute violations of ORC 6111.07. However, it should be pointed out that the system returned to compliance much faster during this period than in the past. It may have been a combination of increased capacity in the pure oxygen tanks and actions taken by plant personnel to monitor and provide alkalinity to the system when needed. Regardless, plant personnel responded quickly to bring the plant back into compliance with the NPDES Permit.

Consent Order

On October 22, 2008, Mahoning County and Ohio EPA entered into a consent agreement for the Meander, Boardman and Campbell WWTPs. Following are the items in the consent agreement that pertain to the Meander WWTP and have actions pending.

- *Section V, Item 6* enjoins the County to permanently comply with the terms and

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conditions of NPDES Permit No. 3PK00011.

- *Section VI, Item 7* requires the County to evaluate the grit removal system. As stated above, this is near completion and scheduled for start-up in March 2010.

Operator of Record

Part II, Item C requires Mahoning County to report the operator of record to Ohio EPA within 60 days of the effective date of the permit. The notification was to be submitted on a form acceptable to Ohio EPA. The Web site for the appropriate form was identified in Part II, Item C.2 of the NPDES Permit.

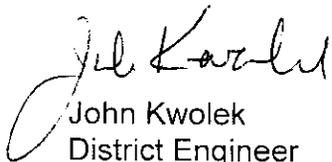
To date the Ohio EPA has not received the required operator of record notification. The county must submit the completed form within 7 days of receipt of this inspection report.

Response Requested

As stated in Item 6 above, please provide a response to this inspection report indicating the type of back-up power to be installed at the Meander POTW and a schedule for completing the activities. It is anticipated that the back-up power will be installed and operational before the end of 2010. The requested response to this report should be provided no later than March 5, 2010.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this letter.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Mr. Bob Lyden, Acting County Sanitary Engineer
Joe DeNiro, Superintendent, Meander POTW

File: Public/Mahoning County/Meander WWTP/Permit and Compliance