

**Environmental  
Protection Agency**

John R. Estick, **Governor**  
Richard Cordell, **Lt. Governor**  
Michael DeWine, **Director**

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September 13, 2011

RE: TRUMBULL COUNTY  
BAZETTA TOWNSHIP  
TRUMBULL COUNTY BAZETTA WWTP  
1440 STERLING DRIVE  
NPDES PERMIT NO. OH0092550  
OHIO EPA PERMIT NO. 3PG00140

Mr. Rex Fee, Executive Director  
Trumbull County Sanitary Engineers  
7500 Anderson Avenue, N.E.  
Warren, Ohio 44484

Dear Mr. Fee:

On September 6, 2011, Mr. Chris Moody and the undersigned, both of the Ohio Environmental Protection Agency (EPA), performed a compliance evaluation inspection at the above-referenced facility. The facility was represented by Mr. William Durst of the Trumbull County Sanitary Engineers. The purpose of the inspection was to evaluate the operational compliance of the facility with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

It was noted that the treatment plant improvements approved pursuant to permit-to-install No. 609780 had been completed. Existing treatment components consist of a bar screen, flow equalization basin, 84,000 gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration and UV disinfection. Sludge handling consists of an aerated sludge holding tank. Treated effluent is discharged to Mosquito Creek Reservoir.

At the time of the inspection, the overall operation of the treatment processes and equipment appeared to be satisfactory. The treatment plant was producing an effluent of satisfactory visual quality.

The following site-specific observations and/or deficiencies were noted during the inspection:

1. The facility did have bound and numbered log books on site to record maintenance visits, however maintenance activities were not being recorded in them. Any and all operation and maintenance activities performed by the operators must be recorded in the log book.
2. The color of the mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.

*[Faint signature and text]*

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3. Please ensure that once a sand filter is taken out of service, it is cleaned, raked and leveled.
4. Please ensure the washout hole in the sand filter that is shown in the attached pictures is repaired.
5. Please ensure that proper pipe support is provided for the sand filter dose pipes to ensure that unnecessary stresses are not being placed on the flexible rubber gaskets located on the distribution box.
6. The facility needs a discharge sign at the outfall. When this issue was mentioned to Mr. Durst, he explained that his office is currently working on obtaining a sign for the outfall.
7. A number of the UV bulbs were not functioning properly. When this was pointed out to Mr. Durst, he made a phone call to have maintenance personnel address the issue immediately. Please ensure that this issue was followed up on.
8. Past correspondence from this office has required that the bypass piping in the disinfection chamber be removed. Despite past assurances from your office that the disinfection chamber would be modified to eliminate this pipe, this requirement has not been met. Please see to it that the bypass pipe is eliminated.

A review of the facility's monthly discharge monitoring reports from January 2009 – August 2011 indicated the following permit limit and/or monitoring frequency violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2010	001	00300	Dissolved Oxygen	1D Conc	6.0	4.5	6/23/2010

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2009	001	00010	Water Temperature	1/Day	1	0	03/02/2009

The facility's current NPDES permit expires on March 31, 2012. This office received a permit renewal application on August 10, 2011. Once the new NPDES permit is issued, Ohio EPA advises that the permittee read through it carefully because there will be a number of changes made to it.

One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. Monitoring requirements for E. coli, and all other new parameters, will be described in the new permit.

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Please inform this office in writing, within 14 days receipt of this letter, as to the actions that will be taken, or have been taken, to address the above violations and/or deficiencies. Your response shall include specific dates for initiation and completion of this action plan. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Should you have any questions or comments regarding this letter, please contact this office at 330-963-1120.

Respectfully,



Tomás Parry  
Environmental Engineer  
Division of Surface Water

TP//cs

Enclosures: photographs

ec: Chris Moody, Ohio EPA, NEDO, DSW

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