



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korfuski, Director

November 22, 2010

RE: TRUMBULL COUNTY
MOSQUITO CREEK WWTP
NPDES PERMIT NO: OH0043401
OHIO EPA PERMIT NO. 3PK00009
COMPLIANCE EVALUATION INSPECTION

Mr. Rex Fee, Executive Director
Trumbull County Sanitary Engineer's Office
842 Youngstown Kingsville Road
Vienna, Ohio 44473

Dear Mr. Fee:

On October 20, 2010, an inspection of the above referenced facility was conducted by Mr. Tomas Parry and the undersigned. The facility was represented by Mr. Mark Mound, Operator and Ms. Lori Baker, Lab Analyst. The purpose of the inspection was to obtain and review information in anticipation of renewal of the National Pollutant Discharge Elimination System (NPDES) discharge permit. During the course of the inspection, evaluations were conducted of the treatment processes, effluent discharge quality, laboratory performance, and biosolids management.

NPDES Permit Status

The NPDES permit for this facility expired on July 31, 2010. Receipt of a timely renewal application by Ohio EPA on February 1, 2010 authorizes the Mosquito Creek WWTP to discharge beyond the expiration date.

Facility Description

The wet-stream processes of the 4.2 MGD treatment plant consist of comminution/mechanical bar screening, aerated grit removal, micro-screening, primary settling, activated sludge, intermediate settling, nitrification towers, final settling, chlorine disinfection, dechlorination, and post aeration. Off-line flow equalization is provided in a lagoon for peak flow retention. The plant discharges to Mosquito Creek. Waste activated sludge is presently processed through an aerobic digester and belt filter press prior to landfill disposal.

Inspection Findings/Compliance Status

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

1. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. A visual observation of the plant effluent revealed no signs of floating debris, oil & grease, or foam in the discharge. Additionally, no adverse impact was evident within the mixing zone and downstream segments of Mosquito Creek.
2. The influent and effluent composite samplers were set to collect "time-weighted" samples. Please be advised the NPDES permit requires the collection of "flow-proportionate" samples.

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2110 East Aurora Road
Twinsburg, OH 44087-1924

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3. Please ensure that the operator logbooks, i.e. chlorine analyses, are maintained with the meter. Additionally, the log entries should include the name or initials of the analyst.
4. The facility will be reclassified as a Class III treatment works in accordance with Ohio Administrative Code (OAC) 3745-7. Additionally, the facility must provide written notice regarding the name and certification of the designated operator(s) of record for the facility and collection system. Please complete the enclosed Operator of Record (ORC) Notification Form and return it to the specified address within 30 days of receipt of this letter.
5. As of March 15, 2010, the current Fecal Coliform water quality standard has been replaced by an *E. coli* standard. Based on the new Class B Primary Contact Recreation standard, the projected *E. coli* effluent limitations for the facility will be 161/100 ml (30-day average) and 362/100 ml (7-day average). The new standards will be applied at the time of NPDES permit renewal. The need for a compliance schedule, as well as the length of the schedule, will be determined on a case-by-case basis.

A review of monthly Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period, November 2009 – October 2010, 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
March 2010	001	Silver, Total Recovera	30D Conc	2.0	2.55	3/1/2010
March 2010	001	Silver, Total Recovera	30D Qty	0.03	.05048	3/1/2010
April 2010	001	Silver, Total Recovera	30D Conc	2.0	2.28	4/1/2010
April 2010	001	Silver, Total Recovera	30D Qty	0.03	.03003	4/1/2010
April 2010	001	pH, Minimum	1D Conc	6.5	6.27	4/12/2010
April 2010	001	pH, Minimum	1D Conc	6.5	6.4	4/14/2010
June 2010	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.05059	6/1/2010
June 2010	001	Nitrogen, Ammonia (NH3	30D Qty	32	33.0456	6/1/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.08	6/18/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.08	6/19/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/20/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/21/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/22/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/23/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/24/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/27/2010
July 2010	001	Chlorine, Total Residu	1D Conc	0.027	.44	7/26/2010
September 2010	001	Chlorine, Total Residu	1D Conc	0.027	.4	9/2/2010
September 2010	001	Chlorine, Total Residu	1D Conc	0.027	.33	9/3/2010

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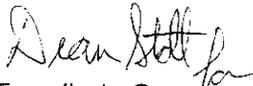
Conclusion

Please be advised, failure to comply with the terms and conditions of the NPDES permits may be cause for enforcement pursuant to the Ohio Revised Code Chapter 6111. It is requested that the County 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.

A draft copy of the renewal permit will be sent under separate cover. Any comments regarding the draft permit must be submitted in writing during the public notice period.

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

Enclosure: ORC Form

cc: Art Bain, Plant Superintendent

File: Public/Trumbull County/Mosquito Creek WWTP