



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 15, 2008

RE: TRUMBULL COUNTY
BROOKFIELD WWTP
NPDES PERMIT NO: OH0036285
OHIO EPA PERMIT NO. 3PJ00001
COMPLIANCE EVALUATION INSPECTION

Mr. Rex Fee, Executive Director
Trumbull County Sanitary Engineer
842 Youngstown Kingsville Road
Vienna, OH 44473

Dear Mr. Fee:

On January 15, 2008, a Compliance Evaluation Inspection was conducted at the Trumbull County Brookfield WWTP by the undersigned. The facility was represented by Messrs. Charles Yannucci and Art Bain. 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. During the inspection, evaluations were conducted of the treatment processes and effluent discharge to Yankee Creek.

Inspection Findings/Compliance Status

At the time of the inspection, 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 Yankee Creek.

A review of monthly operating reports received at this office for the period August 2006 through December 2007 indicates violations of the final effluent limitations contained in the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2006	001	Chlorine, Total Residual	1D Conc	0.02	.06	10/17/2006
July 2007	001	Chlorine, Total Residual	1D Conc	0.02	.06	7/17/2007
June 2007	001	pH, Minimum	1D Conc	6.5	6.41	6/18/2007
December 2007	001	Total Suspended Solids	30D Qty	59	68.3068	12/1/2007
January 2007	001	Total Suspended Solids	7D Qty	89	95.8538	1/15/2007
December 2007	001	Total Suspended Solids	7D Qty	89	137.582	12/8/2007

In addition to the above, the evaluation noted the following headworks bypasses at the swirl concentrator (station 602):

Station	Parameter	Reporting Unit	Date	Reported Value
602	Bypass Volume	MGAL	1/5/2007	0.731
602	Bypass Volume	MGAL	1/13/2007	0.274
602	Bypass Volume	MGAL	1/15/2007	2.002

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Station	Parameter	Reporting Unit	Date	Reported Value
602	Bypass Volume	MGAL	3/2/2007	3.146
602	Bypass Volume	MGAL	3/15/2007	1.799
602	Bypass Volume	MGAL	8/20/2007	0.2977
602	Bypass Volume	MGAL	10/23/2007	0.1742
602	Bypass Volume	MGAL	12/12/2007	0.3008
602	Bypass Volume	MGAL	12/13/2007	0.6498
602	Bypass Volume	MGAL	12/23/2007	0.1263

Based on the above, it would appear that the facility continues to experience impacts from excessive inflow and infiltration (I/I). We understand that the County has initiated a study to evaluate 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 County has made at the treatment plant.

Summary/Conclusion

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. 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.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

File: Public/Permit&Compliance//Trumbull County Brookfield WWTP