



State of Ohio Environmental Protection Agency

Northeast District Office

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

December 23, 2009

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:

Please find enclosed a copy of the laboratory data compiled by Ohio EPA for the samples collected on September 28-29, 2009, at the Trumbull County Mosquito Creek 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 Mosquito Creek. The samples were analyzed by Ohio EPA for the routine permit parameters, organic constituents, and toxicity. The facility was represented by Art Bain, Interim Plant Superintendent

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, 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 thru an aerobic digester and belt filter press prior to landfill disposal.

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. It was noted that requisitions had been made for the replacement of two aeration tank blowers and the micro-screens.
2. 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.
3. The analytical data revealed 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.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, January 2008 – October 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
July 2008	001	Chlorine, Total Residu	1D Conc	0.027	.48	7/9/2008
September 2008	001	Chlorine, Total Residu	1D Conc	0.027	.6	9/13/2008
September 2008	001	Chlorine, Total Residu	1D Conc	0.027	.65	9/14/2008
September 2008	001	Chlorine, Total Residu	1D Conc	0.027	.57	9/15/2008
October 2008	001	Chlorine, Total Residu	1D Conc	0.027	.37	10/21/2008
October 2008	001	Chlorine, Total Residu	1D Conc	0.027	.38	10/22/2008
October 2008	001	Chlorine, Total Residu	1D Conc	0.027	.31	10/23/2008
October 2008	001	Chlorine, Total Residu	1D Conc	0.027	.32	10/24/2008
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.2	5/22/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.16	5/23/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	5/24/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.22	5/25/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	5/26/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.08	5/27/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.08	5/28/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	5/29/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	5/30/2009
May 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	5/31/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/1/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/2/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/3/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/4/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/5/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/6/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.14	6/7/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/8/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/9/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/10/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/11/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/14/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/15/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/16/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/17/2009

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/18/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/19/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/20/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/21/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/22/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/23/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	6/24/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/25/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/26/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/27/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	6/28/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.08	6/29/2009
June 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	6/30/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/1/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/2/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/3/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/4/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/5/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.08	7/6/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/7/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/8/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/9/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.07	7/10/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	7/11/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	7/12/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/13/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/14/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/15/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	7/16/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/18/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/19/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	7/20/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/21/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/22/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/23/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/24/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/25/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/26/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.09	7/29/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.06	7/30/2009
July 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	7/31/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	8/1/2009

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 Trumbull County Sanitary Engineer's Office
 December 23, 2009
 Page 4

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	8/2/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	8/4/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	8/6/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	8/9/2009
August 2009	001	Chlorine, Total Residu	1D Conc	0.027	.05	8/10/2009
June 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.08	6/1/2008
June 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.81	6/22/2008
June 2008	001	Nitrogen, Ammonia (NH3	7D Qty	48	50.6545	6/22/2008
July 2008	001	Nitrogen, Ammonia (NH3	30D Conc	2.0	2.98231	7/1/2008
July 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	4.31667	7/1/2008
July 2008	001	Nitrogen, Ammonia (NH3	30D Qty	32	42.0386	7/1/2008
July 2008	001	Nitrogen, Ammonia (NH3	7D Qty	48	53.9995	7/1/2008
July 2008	001	Nitrogen, Ammonia (NH3	7D Conc	3.0	3.1975	7/8/2008
July 2008	001	Nitrogen, Ammonia (NH3	7D Qty	48	52.1741	7/8/2008
October 2008	001	Nitrogen, Ammonia (NH3	7D Qty	48	48.1791	10/22/2008
September 2009	001	Silver, Total Recovers	30D Conc	2.0	4.61	9/1/2009
September 2009	001	Silver, Total Recovers	30D Qty	0.03	.0438	9/1/2009

Station	Parameter	Units	Date	Reported Value	A Code
1	Water Temperature	C	9/18/2009		AD
1	Water Temperature	C	9/20/2009		AD
1	Total Suspended Solids	mg/l	2/10/2008		AH
1	Total Suspended Solids	mg/l	2/11/2008		AH
1	Total Suspended Solids	mg/l	2/12/2008		AH
1	Total Suspended Solids	mg/l	2/14/2008		AH
1	Total Suspended Solids	mg/l	1/21/2009		AH
1	Total Suspended Solids	mg/l	3/5/2009		AH
1	Total Suspended Solids	mg/l	8/20/2009		AH
1	Total Suspended Solids	mg/l	8/23/2009		AH
1	Total Suspended Solids	mg/l	8/24/2009		AH
1	Total Suspended Solids	mg/l	8/25/2009		AH
1	Total Suspended Solids	mg/l	10/5/2009		AH
1	Total Suspended Solids	mg/l	10/7/2009		AH
1	Total Suspended Solids	mg/l	10/12/2009		AH
1	Total Suspended Solids	mg/l	10/14/2009		AH
1	Total Suspended Solids	mg/l	10/20/2009		AH
1	Total Suspended Solids	mg/l	10/21/2009		AH
1	Total Suspended Solids	mg/l	10/22/2009		AH
1	Total Suspended Solids	mg/l	11/24/2009		AH
1	Total Suspended Solids	mg/l	11/25/2009		AH
1	Total Suspended Solids	mg/l	11/26/2009		AH
1	Oil and Grease, Hexane Extr Method	mg/l	11/17/2009		AE

Station	Parameter	Units	Date	Reported Value	A Code
1	Nitrogen, Ammonia (NH3)	mg/l	2/10/2008		AH
1	Nitrogen, Ammonia (NH3)	mg/l	2/11/2008		AH
1	Nitrogen, Ammonia (NH3)	mg/l	2/12/2008		AH
1	Nitrogen, Ammonia (NH3)	mg/l	2/14/2008		AH
1	Nitrogen, Ammonia (NH3)	mg/l	1/21/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	3/5/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	8/20/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	8/23/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	8/24/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	8/25/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/5/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/7/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/12/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/14/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/20/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/21/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	10/22/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	11/24/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	11/25/2009		AH
1	Nitrogen, Ammonia (NH3)	mg/l	11/26/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	4/23/2008		AH
1	Nitrite Plus Nitrate, Total	mg/l	5/28/2008		AH
1	Nitrite Plus Nitrate, Total	mg/l	6/17/2008		AH
1	Nitrite Plus Nitrate, Total	mg/l	7/28/2008		AH
1	Nitrite Plus Nitrate, Total	mg/l	8/20/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	8/23/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	8/24/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	8/25/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	8/26/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	8/27/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/1/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/5/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/7/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/12/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/14/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/20/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/21/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/22/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	10/26/2009		AH
1	Nitrite Plus Nitrate, Total	mg/l	11/23/2009		AH
1	Phosphorus, Total (P)	mg/l	8/23/2009		AH
1	Phosphorus, Total (P)	mg/l	8/24/2009		AH

Station	Parameter	Units	Date	Reported Value	A Code
1	Phosphorus, Total (P)	mg/l	8/25/2009		AH
1	Phosphorus, Total (P)	mg/l	8/26/2009		AH
1	Phosphorus, Total (P)	mg/l	8/27/2009		AH
1	Cyanide, Free	mg/l	8/20/2009		AH
1	Cyanide, Free	mg/l	8/23/2009		AH
1	Cyanide, Free	mg/l	8/24/2009		AH
1	Cyanide, Free	mg/l	8/25/2009		AH
1	Cyanide, Free	mg/l	8/26/2009		AH
1	Cyanide, Free	mg/l	8/27/2009		AH
1	Nickel, Total Recoverable	ug/l	8/20/2009		AH
1	Nickel, Total Recoverable	ug/l	8/23/2009		AH
1	Nickel, Total Recoverable	ug/l	8/24/2009		AH
1	Nickel, Total Recoverable	ug/l	8/25/2009		AH
1	Nickel, Total Recoverable	ug/l	8/26/2009		AH
1	Nickel, Total Recoverable	ug/l	8/27/2009		AH
1	Zinc, Total Recoverable	ug/l	8/20/2009		AH
1	Zinc, Total Recoverable	ug/l	8/23/2009		AH
1	Zinc, Total Recoverable	ug/l	8/24/2009		AH
1	Zinc, Total Recoverable	ug/l	8/25/2009		AH
1	Zinc, Total Recoverable	ug/l	8/26/2009		AH
1	Zinc, Total Recoverable	ug/l	8/27/2009		AH
1	Cadmium, Total Recoverable	ug/l	8/20/2009		AH
1	Cadmium, Total Recoverable	ug/l	8/23/2009		AH
1	Cadmium, Total Recoverable	ug/l	8/24/2009		AH
1	Cadmium, Total Recoverable	ug/l	8/25/2009		AH
1	Cadmium, Total Recoverable	ug/l	8/26/2009		AH
1	Cadmium, Total Recoverable	ug/l	8/27/2009		AH
1	Lead, Total Recoverable	ug/l	8/20/2009		AH
1	Lead, Total Recoverable	ug/l	8/23/2009		AH
1	Lead, Total Recoverable	ug/l	8/24/2009		AH
1	Lead, Total Recoverable	ug/l	8/25/2009		AH
1	Lead, Total Recoverable	ug/l	8/26/2009		AH
1	Lead, Total Recoverable	ug/l	8/27/2009		AH
1	Chromium, Total Recoverable	ug/l	8/20/2009		AH
1	Chromium, Total Recoverable	ug/l	8/23/2009		AH
1	Chromium, Total Recoverable	ug/l	8/24/2009		AH
1	Chromium, Total Recoverable	ug/l	8/25/2009		AH
1	Chromium, Total Recoverable	ug/l	8/26/2009		AH
1	Chromium, Total Recoverable	ug/l	8/27/2009		AH
1	Copper, Total Recoverable	ug/l	8/20/2009		AH
1	Copper, Total Recoverable	ug/l	8/23/2009		AH
1	Copper, Total Recoverable	ug/l	8/24/2009		AH

Station	Parameter	Units	Date	Reported Value	A Code
1	Copper, Total Recoverable	ug/l	8/25/2009		AH
1	Copper, Total Recoverable	ug/l	8/26/2009		AH
1	Copper, Total Recoverable	ug/l	8/27/2009		AH
1	Chromium, Dissolved Hexavalent	ug/l	8/20/2009		AH
1	Chromium, Dissolved Hexavalent	ug/l	8/23/2009		AH
1	Chromium, Dissolved Hexavalent	ug/l	8/24/2009		AH
1	Chromium, Dissolved Hexavalent	ug/l	8/25/2009		AH
1	Chromium, Dissolved Hexavalent	ug/l	8/26/2009		AH
1	Chromium, Dissolved Hexavalent	ug/l	8/27/2009		AH
1	Fecal Coliform	#/100 ml	5/1/2008		AH
1	Fecal Coliform	#/100 ml	5/5/2008		AH
1	Fecal Coliform	#/100 ml	5/22/2008		AH
1	Fecal Coliform	#/100 ml	5/26/2008		AH
1	Fecal Coliform	#/100 ml	5/11/2009		AH
1	Fecal Coliform	#/100 ml	8/20/2009		AH
1	Fecal Coliform	#/100 ml	8/24/2009		AH
1	Fecal Coliform	#/100 ml	8/25/2009		AH
1	Fecal Coliform	#/100 ml	8/26/2009		AH
1	Fecal Coliform	#/100 ml	8/27/2009		AH
1	Fecal Coliform	#/100 ml	10/1/2009		AH
1	Fecal Coliform	#/100 ml	10/6/2009		AH
1	Fecal Coliform	#/100 ml	10/12/2009		AH
1	Fecal Coliform	#/100 ml	10/13/2009		AH
1	Fecal Coliform	#/100 ml	10/15/2009		AH
1	Fecal Coliform	#/100 ml	10/19/2009		AH
1	Fecal Coliform	#/100 ml	10/21/2009		AH
1	Fecal Coliform	#/100 ml	10/22/2009		AH
1	Fecal Coliform	#/100 ml	10/27/2009		AH
1	Flow Rate	MGD	1/11/2009		AD
1	Flow Rate	MGD	1/12/2009		AD
1	Flow Rate	MGD	1/13/2009		AD
1	Flow Rate	MGD	1/14/2009		AD
1	Flow Rate	MGD	1/15/2009		AD
1	Flow Rate	MGD	1/16/2009		AD
1	Flow Rate	MGD	1/17/2009		AD
1	Flow Rate	MGD	1/18/2009		AD
1	Flow Rate	MGD	1/19/2009		AD
1	Flow Rate	MGD	1/20/2009		AD
1	Flow Rate	MGD	1/21/2009		AD
1	Flow Rate	MGD	1/22/2009		AD
1	Flow Rate	MGD	1/23/2009		AD
1	Flow Rate	MGD	1/24/2009		AD

Station	Parameter	Units	Date	Reported Value	A Code
1	Flow Rate	MGD	1/25/2009		AD
1	Flow Rate	MGD	1/26/2009		AD
1	Flow Rate	MGD	1/27/2009		AD
1	Flow Rate	MGD	1/28/2009		AD
1	Flow Rate	MGD	6/4/2009		AH
1	Mercury, Total (Low Level)	ng/l	3/4/2008		AH
1	Mercury, Total (Low Level)	ng/l	6/18/2008	2.49	AH
1	CBOD 5 day	mg/l	2/10/2008		AH
1	CBOD 5 day	mg/l	2/11/2008		AH
1	CBOD 5 day	mg/l	2/12/2008		AH
1	CBOD 5 day	mg/l	2/14/2008		AH
1	CBOD 5 day	mg/l	1/21/2009		AH
1	CBOD 5 day	mg/l	3/5/2009		AH
1	CBOD 5 day	mg/l	8/16/2009		AH
1	CBOD 5 day	mg/l	8/18/2009		AH
1	CBOD 5 day	mg/l	8/19/2009		AH
1	CBOD 5 day	mg/l	8/20/2009		AH
1	CBOD 5 day	mg/l	8/23/2009		AH
1	CBOD 5 day	mg/l	8/24/2009		AH
1	CBOD 5 day	mg/l	8/25/2009		AH
1	CBOD 5 day	mg/l	10/5/2009		AH
1	CBOD 5 day	mg/l	10/7/2009		AH
1	CBOD 5 day	mg/l	10/12/2009		AH
1	CBOD 5 day	mg/l	10/14/2009		AH
1	CBOD 5 day	mg/l	10/20/2009		AH
1	CBOD 5 day	mg/l	10/21/2009		AH
1	CBOD 5 day	mg/l	10/22/2009		AH
1	CBOD 5 day	mg/l	11/24/2009		AH
1	CBOD 5 day	mg/l	11/25/2009		AH
1	CBOD 5 day	mg/l	11/26/2009		AH

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

- 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	Chromium, Dissolved Hexavalent	ug/l	3/24/2008	0.01
001	Chromium, Dissolved Hexavalent	ug/l	8/25/2008	0.006
001	Chromium, Dissolved Hexavalent	ug/l	3/24/2009	0.014

Station	Parameter	Units	Date	Reported Value
601	Chromium, Total Recoverable	ug/l	12/15/2008	0.045
601	Chromium, Dissolved Hexavalent	ug/l	3/24/2008	0.04
601	Chromium, Dissolved Hexavalent	ug/l	8/25/2008	0.081
601	Chromium, Dissolved Hexavalent	ug/l	3/24/2009	0.072
901	Chromium, Dissolved Hexavalent	ug/l	8/25/2008	0.004
901	Chromium, Dissolved Hexavalent	ug/l	3/24/2009	0.007

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.

- The facility's Quality Assurance/Quality Control (QA/QC) protocols are still not up to date. The laboratory must continually review and graphically display the QA/QC data that is being generated. This deficiency may be due, in part, to the reduction of the staffing level in the laboratory.
- The facility's eDMRs are currently being submitted and certified by Ms. Lori Baker. 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 an executive County official 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, Ms. Baker **cannot** sign and certify the eDMRs.

Mr. Rex Fee, Executive Director
Trumbull County Sanitary Engineer's Office
December 23, 2009
Page 10

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.

It is requested that the County submit a written response to this office documenting the actions taken or proposed to address the above violations and/or deficiencies. Your response shall include dates for initiation and completion of the actions. Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to \$10,000 per day of violation.

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:bo

pc: Art Bain, Interim Plant Superintendent

File: Public/Trumbull County/Mosquito Creek WWTP