



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 6, 2011

RE: TRUMBULL COUNTY
MECCA TOWNSHIP
JAK'S FINE FOODS
NPDES PERMIT NO. OH0137049
OHIO EPA PERMIT NO. 3PR00411

Mr. Kevin Cook, Owner
Jak's Fine Foods
2323 Greenville Road
Cortland, Ohio 44410

Dear Mr. Cook:

On May 25, 2011 an inspection of the above referenced wastewater treatment plant was conducted by Mr. Steve Kramer of the Trumbull County Health Department and the undersigned. The purpose of the inspection was to evaluate the operational performance of the treatment system and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The current treatment system consists of a trash trap, 2,462 gpd extended aeration activated sludge package plant, final settling tank, scum tank, slow surface sand filtration, and chlorination/dechlorination disinfection system.

At the time of the inspection, the following deficiencies were noted:

1. You explained during the inspection that work done at the plant is recorded on a computer. In addition to the computer, maintenance activities should also be recorded in a bound and numbered log book. Any and all work or maintenance done at the plant should be recorded in these log books, along with the times of arrival and departure.
2. The NPDES permit requires that flow rates be **estimated** and reported. The facility consistently reports a flow rate of 2462 gpd for Outfall 001. The flow should be estimated using accepted engineering practices.
3. The sand filter dose pumps were not cycling when attempts were made to run them manually. Please confirm that they are functioning properly. If they are not, please supply documentation to this office verifying that they were serviced and made operational.
4. Effluent was of satisfactory visual quality.

Alissa Taylor, 6/10/11

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5. The color of the mixed liquor was not the deep chocolate brown that's indicative of well-fed bacteria. The color was greyish, indicating possible underloading of the system.
6. Foam was visible in the aeration tank.
7. The chlorine tablets in the disinfection chamber were nearly completely dissolved away, and did not appear to be properly dropping down. Additionally, no de-chlorination tablets were observed.
8. Ohio EPA has received the renewal application for the facility's current NPDES permit, which expires August 31, 2011. Please be aware that upon renewal of the plant's NPDES permit, there will be language requiring a sign to be placed at the outfall. Details regarding what needs to be displayed on the sign will be described in the new permit.

A review of the facility's monthly Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period November 2008 – May 2011 indicated the following violations of the effluent limitations contained in the NPDES permit:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.64	12/1/2010
December 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.03	.03392	12/1/2010
June 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.19	6/1/2009
June 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.009	.01109	6/1/2009

We understand that Mr. Brian Mosko and Mr. Ed Mosko, of Valley Environmental Labs, Inc., have been routinely submitting the DMRs electronically via an assigned Personal Identification Number (PIN). Pursuant to Part III of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22". 40 CFR 122.22 (a) states that reports for a corporation can only be signed and certified by an individual with decision making privileges, or by a duly authorized representative of said individual. Pursuant to 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*

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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.*

Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of a written contract between Jak's Fine Foods and a state-certified operator.

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.

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 14 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,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/mt

cc: Travis Cook, Jak's Fine Foods
Steve Kramer, R.S., Trumbull County Health Department