

**Environmental
Protection Agency**

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

April 12, 2011

RE: TRUMBULL COUNTY
HUBBARD TOWNSHIP
BELL-WICK BOWL, INC.
NPDES PERMIT NO.OH0129283
OHIO EPA PERMIT NO. 3PR00262

Mr. Francis Zitnik
Bell-Wick Bowl, Inc.
6105 W. Liberty St. SE
Hubbard, OH 44425

Dear Mr. Zitnik:

On March 31, 2011, an inspection of the above referenced wastewater treatment plant was conducted by Mr. Richard Curl of the Trumbull County Health Department and the undersigned. The inspection was performed 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 2,500 gallon/day treatment system consists of a trash trap, flow equalization basin, extended aeration activated sludge package plant, final settling tank, slow surface sand filtration, sludge holding, and effluent disinfection.

At the time of the inspection, the following observations and/or deficiencies were noted:

1. A visual determination of final effluent quality could not be determined because the discharge pipe was partially buried in the bed of the receiving stream.
2. There was no visit/maintenance log book on site. Bound and numbered log books should be kept on site as a means to record all site visits by maintenance and operating personnel. 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.
3. Please be aware that the facility's current NPDES permit expires on September 30, 2011, and Ohio EPA has not yet received the permit renewal application package. Permit renewal applications are required to be submitted 180 days prior to the expiration of the current permit. This allows for ample time to process and issue the permit without having any gaps in permit coverage. Please complete and submit the permit renewal application immediately.

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4. Upon arrival, the south sand filter was filled to capacity. The north filter had approximately 18 inches of standing water. Excessive amounts of water in the sand filters could be a sign of infiltration and inflow (I/I) from storm water entering the treatment system. During the inspection, the sand filter pumps cycled and caused the south filter to overflow onto the ground. Channelization and washed out soil at the base of the sand filters indicated that this is a recurring problem.
5. A recent conversation with Elmer Takash, the treatment system's installer, indicated that the likely cause of the excessive I/I problem is a leaky trash trap. Mr. Takash explained that the trash tank was recently pumped empty, only to completely refill 10 minutes later with clear water. He indicated that the 500-gallon trash trap will be replaced with a brand new trash trap of equal capacity. Please keep this office informed about the status of the installation of the new trash trap. Please note that as long as the new trash trap is equivalent in volume to the existing one, a Permit to Install (PTI) will not be necessary. Any change to the trash trap volume will require a PTI, along with the fees for the required engineering services and PTI review.
6. The aeration tank water was grey in color. This could be indicative of low system use.
7. The north sand filter had a heavy amount of accumulated solids, and needs to be cleaned and raked once the standing water has dissipated. Once the filter has been cleaned and raked, please verify the existing depth of sand, which should be 18". If there is not 18" of sand, new sand will need to be added until the proper depth is obtained. Please repeat this procedure for the south filter if a large amount of accumulated solids is discovered after the standing water dissipates.
8. 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 operating reports received by Ohio EPA for the period February 2008 - March 2011 indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

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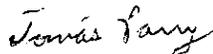
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PR00262*BD	January 2009	001	00083	Color, Severity			AF	1/28/09
3PR00262*BD	January 2009	001	01330	Odor, Severity			AF	1/28/09
3PR00262*BD	January 2009	001	01350	Turbidity, Severity			AF	1/28/09

Ohio EPA recognizes that the plant has been in substantial compliance with the terms and conditions of its current NPDES permit since the last violation in January 2009. Once the new NPDES permit is drafted and 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 10 days of receipt of this notification as to the actions taken or proposed to address the above violations 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:bo

attachments: photos

pc: Richard Curl, R.S., Trumbull County Health Department



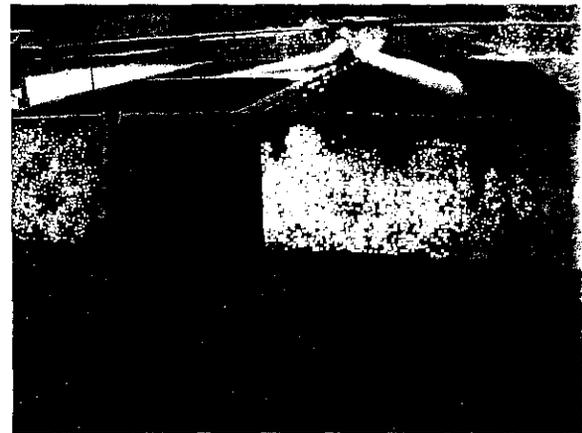
full south sand filter



washout area from repeated overflows



overflowing south sand filter



overflowing south sand filter



buried discharge pipe