



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 25, 2007

RE: TRUMBULL COUNTY
VERNON TOWNSHIP
JOSEPH BADGER SCHOOL
NPDES PERMIT NO. OH0136794
OHIO EPA PERMIT NO. 3PT00122

Mr. David Bair, Superintendent
Joseph Badger Local School District
7119 State Route 7
Kinsman, OH 44428

Dear Mr. Bair:

An inspection was conducted by Mr. Steve Kramer and the undersigned of the sanitary wastewater treatment plant serving the above referenced facility on September 6, 2007. 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.

Inspection Findings/Compliance Status

The current 25,000-gpd treatment system consists of an influent pump station, trash trap, flow equalization basin, extended aeration activated sludge "package" plant, chemical addition (phosphorus removal), final settling tank, upflow clarifier, slow surface sand filtration, and UV disinfection system. The facility discharges to a tributary of Pymatuning Creek.

At the time of the inspection, the treatment components appeared to be in satisfactory condition. The final effluent being discharged appeared to be of satisfactory visual quality. However, a review of the facility's monthly operating reports (MORs) received by Ohio EPA for the period September 2006 through August 2007 indicates violations of the terms and conditions of the NPDES permit. Specifically, the review noted the following violations of the numeric effluent limitations contained in the permit:

Numeric Effluent Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2006	001	Dissolved Oxygen	1D Conc	6.0	5.7	11/2/2006
February 2007	001	Dissolved Oxygen	1D Conc	6.0	4.1	2/7/2007
June 2007	001	Fecal Coliform	30 Conc	1000	6400	6/1/2007
June 2007	001	Fecal Coliform	7D Conc	2000	6400	6/1/2007
October 2006	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	7.905	10/1/2006

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Numeric Effluent Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2006	001	Nitrogen, Ammonia (NH3)	30DConc	1.0	2.47	11/1/2006
February 2007	001	Nitrogen, Ammonia (NH3)	30DConc	3.0	3.095	2/1/2007
May 2007	001	Nitrogen, Ammonia (NH3)	30DConc	1.0	1.58	5/1/2007
October 2006	001	Nitrogen, Ammonia (NH3)	30D Qty	0.0947	.74801	10/1/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.91	10/8/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	11.9	10/22/2006
November 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.18	11/1/2006
November 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.4	11/15/2006
May 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.	5/1/2007
October 2006	001	Nitrogen, Ammonia (NH3)	7D Qty	0.142	.36998	10/8/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Qty	0.142	1.12604	10/22/2006
October 2006	001	Total Suspended Solids	7D Conc	18	19.	10/22/2006
October 2006	001	Total Suspended Solids	7D Qty	1.71	1.79788	10/22/2006

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
October 2006	10/1/2006	001	CBOD 5 day	1/Week	1	0
June 2007	6/8/2007	001	CBOD 5 day	1/Week	1	0
June 2007	6/15/2007	001	CBOD 5 day	1/Week	1	0
June 2007	6/22/2007	001	CBOD 5 day	1/Week	1	0
October 2006	10/2/2006	001	Color, Severity	1/Day	1	0
October 2006	10/3/2006	001	Color, Severity	1/Day	1	0
October 2006	10/4/2006	001	Color, Severity	1/Day	1	0
October 2006	10/6/2006	001	Color, Severity	1/Day	1	0
October 2006	10/9/2006	001	Color, Severity	1/Day	1	0
October 2006	10/10/2006	001	Color, Severity	1/Day	1	0
October 2006	10/26/2006	001	Color, Severity	1/Day	1	0
October 2006	10/30/2006	001	Color, Severity	1/Day	1	0
October 2006	10/31/2006	001	Color, Severity	1/Day	1	0
April 2007	4/15/2007	001	Dissolved Oxygen	1/Week	1	0
May 2007	5/8/2007	001	Dissolved Oxygen	1/Week	1	0
June 2007	6/15/2007	001	Dissolved Oxygen	1/Week	1	0
June 2007	6/22/2007	001	Dissolved Oxygen	1/Week	1	0
November 2006	11/1/2006	001	Fecal Coliform	1/Month	1	0
March 2007	3/31/2007	001	Flow Rate	1/Day	1	0
June 2007	6/15/2007	001	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0
October 2006	10/2/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/3/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/4/2006	001	Odor, Severity	1/Day	1	0

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October 2006	001	Nitrogen, Ammonia (NH3)	30D Qty	0.0947	.74801	10/1/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.91	10/8/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	11.9	10/22/2006
November 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.18	11/1/2006
November 2006	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.4	11/15/2006
May 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.	5/1/2007
October 2006	001	Nitrogen, Ammonia (NH3)	7D Qty	0.142	.36998	10/8/2006
October 2006	001	Nitrogen, Ammonia (NH3)	7D Qty	0.142	1.12604	10/22/2006
October 2006	001	Total Suspended Solids	7D Conc	18	19.	10/22/2006
October 2006	001	Total Suspended Solids	7D Qty	1.71	1.79788	10/22/2006

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
October 2006	10/1/2006	001	CBOD 5 day	1/Week	1	0
June 2007	6/8/2007	001	CBOD 5 day	1/Week	1	0
June 2007	6/15/2007	001	CBOD 5 day	1/Week	1	0
June 2007	6/22/2007	001	CBOD 5 day	1/Week	1	0
October 2006	10/2/2006	001	Color, Severity	1/Day	1	0
October 2006	10/3/2006	001	Color, Severity	1/Day	1	0
October 2006	10/4/2006	001	Color, Severity	1/Day	1	0
October 2006	10/6/2006	001	Color, Severity	1/Day	1	0
October 2006	10/9/2006	001	Color, Severity	1/Day	1	0
October 2006	10/10/2006	001	Color, Severity	1/Day	1	0
October 2006	10/26/2006	001	Color, Severity	1/Day	1	0
October 2006	10/30/2006	001	Color, Severity	1/Day	1	0
October 2006	10/31/2006	001	Color, Severity	1/Day	1	0
April 2007	4/15/2007	001	Dissolved Oxygen	1/Week	1	0
May 2007	5/8/2007	001	Dissolved Oxygen	1/Week	1	0
June 2007	6/15/2007	001	Dissolved Oxygen	1/Week	1	0
June 2007	6/22/2007	001	Dissolved Oxygen	1/Week	1	0
November 2006	11/1/2006	001	Fecal Coliform	1/Month	1	0
March 2007	3/31/2007	001	Flow Rate	1/Day	1	0
June 2007	6/15/2007	001	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0
October 2006	10/2/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/3/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/4/2006	001	Odor, Severity	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
October 2006	10/6/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/9/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/10/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/30/2006	001	Odor, Severity	1/Day	1	0
October 2006	10/31/2006	001	Odor, Severity	1/Day	1	0
June 2007	6/15/2007	001	pH	1/Week	1	0
June 2007	6/22/2007	001	pH	1/Week	1	0
October 2006	10/1/2006	001	Phosphorus, Total (P)	1/Month	1	0
February 2007	2/1/2007	001	Phosphorus, Total (P)	1/Month	1	0
October 2006	10/1/2006	001	Total Suspended Solids	1/Week	1	0
June 2007	6/8/2007	001	Total Suspended Solids	1/Week	1	0
June 2007	6/15/2007	001	Total Suspended Solids	1/Week	1	0
June 2007	6/22/2007	001	Total Suspended Solids	1/Week	1	0
October 2006	10/2/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/3/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/4/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/6/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/9/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/10/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/23/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/24/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/25/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/26/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/30/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/31/2006	001	Turbidity, Severity	1/Day	1	0
October 2006	10/2/2006	001	Water Temperature	1/Day	1	0
October 2006	10/3/2006	001	Water Temperature	1/Day	1	0
October 2006	10/4/2006	001	Water Temperature	1/Day	1	0
October 2006	10/6/2006	001	Water Temperature	1/Day	1	0
October 2006	10/9/2006	001	Water Temperature	1/Day	1	0
October 2006	10/10/2006	001	Water Temperature	1/Day	1	0
October 2006	10/12/2006	001	Water Temperature	1/Day	1	0
October 2006	10/13/2006	001	Water Temperature	1/Day	1	0
October 2006	10/16/2006	001	Water Temperature	1/Day	1	0
October 2006	10/18/2006	001	Water Temperature	1/Day	1	0
October 2006	10/19/2006	001	Water Temperature	1/Day	1	0
October 2006	10/20/2006	001	Water Temperature	1/Day	1	0
October 2006	10/23/2006	001	Water Temperature	1/Day	1	0
October 2006	10/24/2006	001	Water Temperature	1/Day	1	0
October 2006	10/25/2006	001	Water Temperature	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
October 2006	10/30/2006	001	Water Temperature	1/Day	1	0
October 2006	10/31/2006	001	Water Temperature	1/Day	1	0
November 2006	11/3/2006	001	Water Temperature	1/Day	1	0
November 2006	11/4/2006	001	Water Temperature	1/Day	1	0
November 2006	11/6/2006	001	Water Temperature	1/Day	1	0
November 2006	11/7/2006	001	Water Temperature	1/Day	1	0
November 2006	11/9/2006	001	Water Temperature	1/Day	1	0
November 2006	11/10/2006	001	Water Temperature	1/Day	1	0
November 2006	11/12/2006	001	Water Temperature	1/Day	1	0
November 2006	11/13/2006	001	Water Temperature	1/Day	1	0
November 2006	11/14/2006	001	Water Temperature	1/Day	1	0
November 2006	11/16/2006	001	Water Temperature	1/Day	1	0
November 2006	11/18/2006	001	Water Temperature	1/Day	1	0
November 2006	11/19/2006	001	Water Temperature	1/Day	1	0
November 2006	11/20/2006	001	Water Temperature	1/Day	1	0
November 2006	11/21/2006	001	Water Temperature	1/Day	1	0
November 2006	11/23/2006	001	Water Temperature	1/Day	1	0
November 2006	11/25/2006	001	Water Temperature	1/Day	1	0
November 2006	11/26/2006	001	Water Temperature	1/Day	1	0
November 2006	11/27/2006	001	Water Temperature	1/Day	1	0
November 2006	11/28/2006	001	Water Temperature	1/Day	1	0
December 2006	12/3/2006	001	Water Temperature	1/Day	1	0
December 2006	12/4/2006	001	Water Temperature	1/Day	1	0
December 2006	12/6/2006	001	Water Temperature	1/Day	1	0
December 2006	12/7/2006	001	Water Temperature	1/Day	1	0
December 2006	12/9/2006	001	Water Temperature	1/Day	1	0
December 2006	12/10/2006	001	Water Temperature	1/Day	1	0
December 2006	12/11/2006	001	Water Temperature	1/Day	1	0
December 2006	12/13/2006	001	Water Temperature	1/Day	1	0
December 2006	12/14/2006	001	Water Temperature	1/Day	1	0
December 2006	12/15/2006	001	Water Temperature	1/Day	1	0
December 2006	12/16/2006	001	Water Temperature	1/Day	1	0
December 2006	12/17/2006	001	Water Temperature	1/Day	1	0
December 2006	12/18/2006	001	Water Temperature	1/Day	1	0
December 2006	12/20/2006	001	Water Temperature	1/Day	1	0
December 2006	12/21/2006	001	Water Temperature	1/Day	1	0
December 2006	12/22/2006	001	Water Temperature	1/Day	1	0
December 2006	12/24/2006	001	Water Temperature	1/Day	1	0
December 2006	12/25/2006	001	Water Temperature	1/Day	1	0
December 2006	12/27/2006	001	Water Temperature	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
December 2006	12/28/2006	001	Water Temperature	1/Day	1	0
December 2006	12/29/2006	001	Water Temperature	1/Day	1	0
December 2006	12/30/2006	001	Water Temperature	1/Day	1	0
December 2006	12/31/2006	001	Water Temperature	1/Day	1	0
January 2007	1/1/2007	001	Water Temperature	1/Day	1	0
January 2007	1/2/2007	001	Water Temperature	1/Day	1	0
January 2007	1/3/2007	001	Water Temperature	1/Day	1	0
January 2007	1/5/2007	001	Water Temperature	1/Day	1	0
January 2007	1/6/2007	001	Water Temperature	1/Day	1	0
January 2007	1/7/2007	001	Water Temperature	1/Day	1	0
January 2007	1/8/2007	001	Water Temperature	1/Day	1	0
January 2007	1/10/2007	001	Water Temperature	1/Day	1	0
January 2007	1/11/2007	001	Water Temperature	1/Day	1	0
January 2007	1/13/2007	001	Water Temperature	1/Day	1	0
January 2007	1/15/2007	001	Water Temperature	1/Day	1	0
January 2007	1/16/2007	001	Water Temperature	1/Day	1	0
January 2007	1/18/2007	001	Water Temperature	1/Day	1	0
January 2007	1/20/2007	001	Water Temperature	1/Day	1	0
January 2007	1/21/2007	001	Water Temperature	1/Day	1	0
January 2007	1/22/2007	001	Water Temperature	1/Day	1	0
January 2007	1/24/2007	001	Water Temperature	1/Day	1	0
January 2007	1/26/2007	001	Water Temperature	1/Day	1	0
January 2007	1/27/2007	001	Water Temperature	1/Day	1	0
January 2007	1/28/2007	001	Water Temperature	1/Day	1	0
January 2007	1/29/2007	001	Water Temperature	1/Day	1	0
January 2007	1/30/2007	001	Water Temperature	1/Day	1	0
January 2007	1/31/2007	001	Water Temperature	1/Day	1	0
February 2007	2/2/2007	001	Water Temperature	1/Day	1	0
February 2007	2/3/2007	001	Water Temperature	1/Day	1	0
February 2007	2/4/2007	001	Water Temperature	1/Day	1	0
February 2007	2/5/2007	001	Water Temperature	1/Day	1	0
February 2007	2/6/2007	001	Water Temperature	1/Day	1	0
February 2007	2/8/2007	001	Water Temperature	1/Day	1	0
February 2007	2/9/2007	001	Water Temperature	1/Day	1	0
February 2007	2/11/2007	001	Water Temperature	1/Day	1	0
February 2007	2/12/2007	001	Water Temperature	1/Day	1	0
February 2007	2/14/2007	001	Water Temperature	1/Day	1	0
February 2007	2/15/2007	001	Water Temperature	1/Day	1	0
February 2007	2/17/2007	001	Water Temperature	1/Day	1	0
February 2007	2/18/2007	001	Water Temperature	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
February 2007	2/19/2007	001	Water Temperature	1/Day	1	0
February 2007	2/21/2007	001	Water Temperature	1/Day	1	0
February 2007	2/22/2007	001	Water Temperature	1/Day	1	0
February 2007	2/23/2007	001	Water Temperature	1/Day	1	0
February 2007	2/24/2007	001	Water Temperature	1/Day	1	0
February 2007	2/26/2007	001	Water Temperature	1/Day	1	0
February 2007	2/27/2007	001	Water Temperature	1/Day	1	0
February 2007	2/28/2007	001	Water Temperature	1/Day	1	0
March 2007	3/1/2007	001	Water Temperature	1/Day	1	0
March 2007	3/6/2007	001	Water Temperature	1/Day	1	0
March 2007	3/7/2007	001	Water Temperature	1/Day	1	0
March 2007	3/9/2007	001	Water Temperature	1/Day	1	0
March 2007	3/12/2007	001	Water Temperature	1/Day	1	0
March 2007	3/14/2007	001	Water Temperature	1/Day	1	0
March 2007	3/15/2007	001	Water Temperature	1/Day	1	0
March 2007	3/19/2007	001	Water Temperature	1/Day	1	0
March 2007	3/21/2007	001	Water Temperature	1/Day	1	0
March 2007	3/22/2007	001	Water Temperature	1/Day	1	0
March 2007	3/26/2007	001	Water Temperature	1/Day	1	0
March 2007	3/28/2007	001	Water Temperature	1/Day	1	0
March 2007	3/29/2007	001	Water Temperature	1/Day	1	0
April 2007	4/1/2007	001	Water Temperature	1/Day	1	0
April 2007	4/4/2007	001	Water Temperature	1/Day	1	0
April 2007	4/5/2007	001	Water Temperature	1/Day	1	0
April 2007	4/7/2007	001	Water Temperature	1/Day	1	0
April 2007	4/8/2007	001	Water Temperature	1/Day	1	0
April 2007	4/9/2007	001	Water Temperature	1/Day	1	0
April 2007	4/11/2007	001	Water Temperature	1/Day	1	0
April 2007	4/12/2007	001	Water Temperature	1/Day	1	0
April 2007	4/13/2007	001	Water Temperature	1/Day	1	0
April 2007	4/14/2007	001	Water Temperature	1/Day	1	0
April 2007	4/15/2007	001	Water Temperature	1/Day	1	0
April 2007	4/16/2007	001	Water Temperature	1/Day	1	0
April 2007	4/18/2007	001	Water Temperature	1/Day	1	0
April 2007	4/19/2007	001	Water Temperature	1/Day	1	0
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April 2007	4/22/2007	001	Water Temperature	1/Day	1	0
April 2007	4/23/2007	001	Water Temperature	1/Day	1	0
April 2007	4/25/2007	001	Water Temperature	1/Day	1	0
April 2007	4/26/2007	001	Water Temperature	1/Day	1	0

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
April 2007	4/27/2007	001	Water Temperature	1/Day	1	0
April 2007	4/28/2007	001	Water Temperature	1/Day	1	0
April 2007	4/29/2007	001	Water Temperature	1/Day	1	0
May 2007	5/2/2007	001	Water Temperature	1/Day	1	0
May 2007	5/3/2007	001	Water Temperature	1/Day	1	0
May 2007	5/4/2007	001	Water Temperature	1/Day	1	0
May 2007	5/5/2007	001	Water Temperature	1/Day	1	0
May 2007	5/6/2007	001	Water Temperature	1/Day	1	0
May 2007	5/8/2007	001	Water Temperature	1/Day	1	0
May 2007	5/9/2007	001	Water Temperature	1/Day	1	0
May 2007	5/10/2007	001	Water Temperature	1/Day	1	0
May 2007	5/11/2007	001	Water Temperature	1/Day	1	0
May 2007	5/12/2007	001	Water Temperature	1/Day	1	0
May 2007	5/13/2007	001	Water Temperature	1/Day	1	0
May 2007	5/14/2007	001	Water Temperature	1/Day	1	0
May 2007	5/16/2007	001	Water Temperature	1/Day	1	0
May 2007	5/17/2007	001	Water Temperature	1/Day	1	0
May 2007	5/18/2007	001	Water Temperature	1/Day	1	0
May 2007	5/19/2007	001	Water Temperature	1/Day	1	0
May 2007	5/20/2007	001	Water Temperature	1/Day	1	0
May 2007	5/21/2007	001	Water Temperature	1/Day	1	0
May 2007	5/23/2007	001	Water Temperature	1/Day	1	0
May 2007	5/24/2007	001	Water Temperature	1/Day	1	0
May 2007	5/26/2007	001	Water Temperature	1/Day	1	0
May 2007	5/27/2007	001	Water Temperature	1/Day	1	0
May 2007	5/28/2007	001	Water Temperature	1/Day	1	0
May 2007	5/30/2007	001	Water Temperature	1/Day	1	0
June 2007	6/2/2007	001	Water Temperature	1/Day	1	0
June 2007	6/3/2007	001	Water Temperature	1/Day	1	0
June 2007	6/4/2007	001	Water Temperature	1/Day	1	0
June 2007	6/6/2007	001	Water Temperature	1/Day	1	0
June 2007	6/7/2007	001	Water Temperature	1/Day	1	0
June 2007	6/8/2007	001	Water Temperature	1/Day	1	0
June 2007	6/9/2007	001	Water Temperature	1/Day	1	0
June 2007	6/10/2007	001	Water Temperature	1/Day	1	0
June 2007	6/12/2007	001	Water Temperature	1/Day	1	0
June 2007	6/13/2007	001	Water Temperature	1/Day	1	0
June 2007	6/14/2007	001	Water Temperature	1/Day	1	0
June 2007	6/15/2007	001	Water Temperature	1/Day	1	0
June 2007	6/16/2007	001	Water Temperature	1/Day	1	0

Monitoring/Reporting Violations						
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June 2007	6/17/2007	001	Water Temperature	1/Day	1	0
June 2007	6/18/2007	001	Water Temperature	1/Day	1	0
June 2007	6/19/2007	001	Water Temperature	1/Day	1	0
June 2007	6/20/2007	001	Water Temperature	1/Day	1	0
June 2007	6/21/2007	001	Water Temperature	1/Day	1	0
June 2007	6/22/2007	001	Water Temperature	1/Day	1	0
June 2007	6/23/2007	001	Water Temperature	1/Day	1	0
June 2007	6/24/2007	001	Water Temperature	1/Day	1	0
June 2007	6/25/2007	001	Water Temperature	1/Day	1	0
June 2007	6/26/2007	001	Water Temperature	1/Day	1	0
June 2007	6/27/2007	001	Water Temperature	1/Day	1	0
June 2007	6/28/2007	001	Water Temperature	1/Day	1	0
June 2007	6/29/2007	001	Water Temperature	1/Day	1	0
June 2007	6/30/2007	001	Water Temperature	1/Day	1	0

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

1. We understand that Valley Environmental has been routinely submitting monthly operating reports for the facility. 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. As such, reports for companies can only be signed and certified by a corporate officer, general partner, proprietor, 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 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.***

Mr. David Bair
Joseph Badger Local School District
September 25, 2007
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2. Pursuant to Ohio Administrative Code (OAC)3745-7- 02, a copy of the contract with your certified operator, Roger Prior, must be submitted to this office. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the daily services (i.e., **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. Signatory authority required pursuant to 40 CFR 122.22 (b) may be addressed under the terms of the contract for submission of Monthly Operating Reports.
3. The facility shall ensure that copies of all records listed in Part III, Paragraph 7 of the NPDES permit are maintained on site.

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

cc: Steve Kramer, Trumbull County Health Department