



**Environmental  
Protection Agency**

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

March 14, 2011

RE: TRUMBULL COUNTY  
VIENNA TOWNSHIP  
CERTIFIED 458-VIENNA  
NPDES PERMIT NO. OH0136981  
OHIO EPA PERMIT NO. 3PR00407

Mr. Art Schmitz, Environmental Manager  
Certified Oil Company  
949 King Avenue  
Columbus, OH 43212

Dear Mr. Schmitz:

On March 9, 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 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 treatment components consist of a trash trap, a 1,500 gpd extended aeration activated sludge treatment process, surface sand filtration, a clarifying basin, and chlorination/dechlorination.

During the inspection, the following observations and deficiencies were noted:

1. There were very little solids in the aeration tank, and the color of the water was quite dark. This appears to be the direct result of low system use, i.e. low flow.
2. The trash trap appeared to be full and in need of being pumped.
3. There were heavy solids deposits in the active sand filter. These solids need to be removed, and the sand raked.
4. 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.
5. The sand filter distribution box is deteriorating badly. Multiple leaky joints were observed when the dose pumps were manually cycled. The distribution box needs to be repaired.

6. Ohio EPA has received the renewal application for the facility's current NPDES permit, which expired October 30, 2010. 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.
7. Foam buildup was observed in the aeration tank.

A review of the facility's monthly discharge monitoring reports (DMRs) received by Ohio EPA for the period, May 2009 – March 2011, indicates violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	41.1	12/1/2009
December 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	35.8	12/1/2009
December 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	46.4	12/22/2009
December 2009	001	80082	CBOD 5 day	30D Conc	10	13.5	12/1/2009
August 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.38	8/1/2010
August 2010	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	4.38	8/22/2010
March 2010	001	00530	Total Suspended Solids	30D Conc	12	14.	3/1/2010
March 2010	001	00530	Total Suspended Solids	7D Conc	18	24.	3/15/2010
March 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.86	3/1/2010
March 2010	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	7.02	3/15/2010
June 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.09	6/1/2010

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2009	001	00530	Total Suspended Solids	1/Quarter	1	0	06/01/2009
June 2009	001	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	06/01/2009
June 2009	001	31616	Fecal Coliform	1/Quarter	1	0	06/01/2009
June 2009	001	80082	CBOD 5 day	1/Quarter	1	0	06/01/2009
August 2009	001	00530	Total Suspended Solids	1/Quarter	1	0	08/01/2009
August 2009	001	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	08/01/2009
August 2009	001	31616	Fecal Coliform	1/Quarter	1	0	08/01/2009
August 2009	001	80082	CBOD 5 day	1/Quarter	1	0	08/01/2009

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

- Ohio Administrative Code (OAC) 3745-7 requires that you have an up-to-date contract with your certified operator. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide

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the onsite services (i.e. **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. If applicable, the signatory authority required pursuant to 40 CFR 122.22 (b) must be addressed under the terms of the contract for submission of DMRs. Please provide to this office a copy of the contract between Certified Oil and its certified plant operator.

- Standard operating procedures for sample collection, storage, transport, and reporting must be documented. In addition, written procedures **shall be** developed for all analyses **required** to be performed onsite, e.g. pH, DO, etc. Calibration and maintenance records must be maintained for the analytical instrumentation.
- The facility shall make sure that detailed analytical reports, including a complete chain of custody record, are received from the laboratory.

Ohio EPA recognizes that the plant has been in compliance since the last violation in August 2010. However, 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. Please inform this office, in writing, within 10 days of receipt of this notification, as to the actions that were taken to address the above referenced violations and/or deficiencies. Include in your follow up report all measures that will be taken to address the deficiencies that were noted during the inspection. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

Should you have any questions or comments regarding this letter, please contact this office.

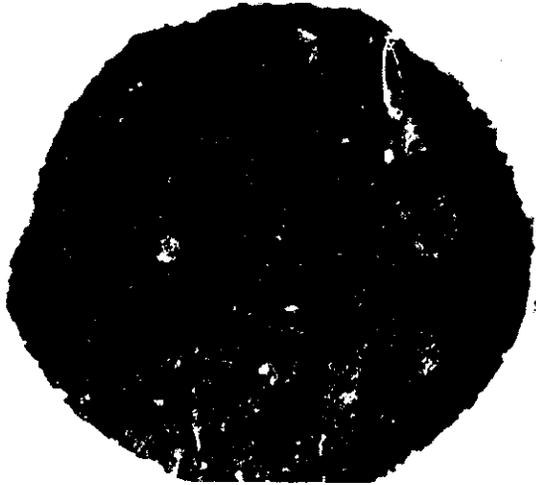
Respectfully,



Tomás Parry  
Environmental Engineer  
Division of Surface Water

TP/mt

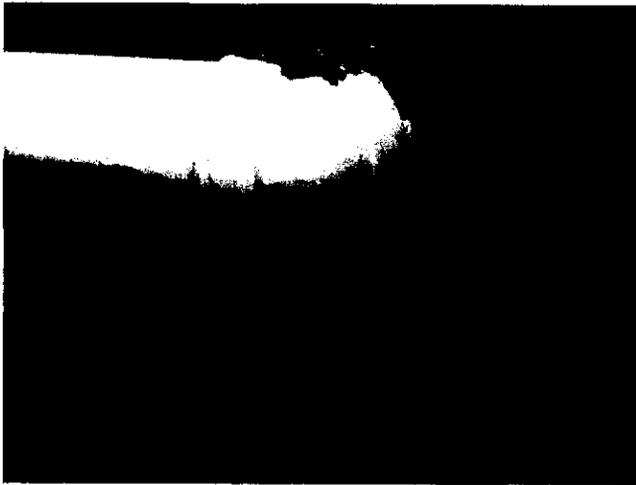
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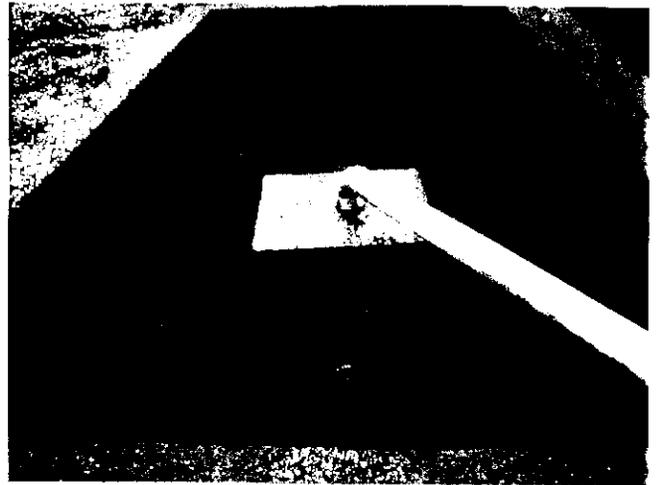
trash trap full of solids



leaky sand filter distribution box joints



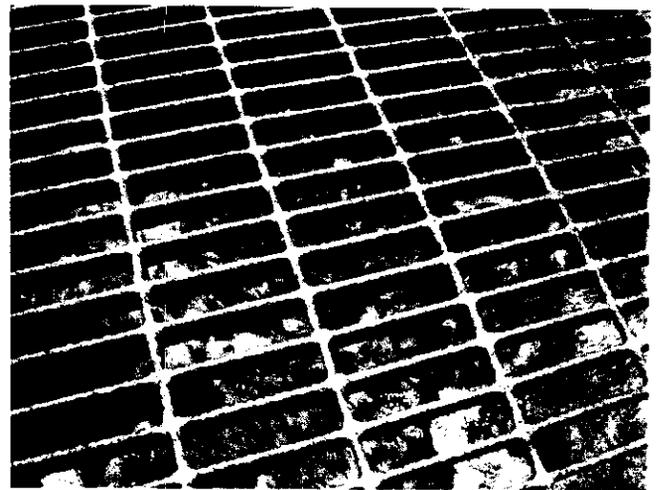
leaky sand filter distribution box joints



solids buildup in active sand filter bed



foam buildup in aeration basin



dark color in aeration basin