

**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

October 31, 2011

RE: TRUMBULL COUNTY  
MVSD WATER TREATMENT PLANT  
NPDES PERMIT NO. OH0107395  
OHIO EPA PERMIT NO. 3IW00041  
DRAFT PERMIT COMMENTS RESPONSE

Mr. Thomas Holloway, P.E., Chief Engineer  
Mahoning Valley Sanitary District  
P.O. Box 4119  
1181 Ohltown-McDonald Road  
Mineral Ridge, Ohio 44440

Dear Mr. Holloway:

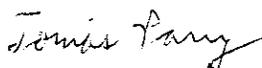
On October 10, 2011, Ohio EPA (OEPA) public noticed a draft renewal of the above-referenced facility's National Pollutant Discharge Elimination System (NPDES) permit. Comments on the draft permit were prepared by you, and received by OEPA on October 12, 2011. Specifically, your comment letter requests that the proposed decrease in the maximum pH limit from 11.0 to 9.0 at Outfall 001 be suspended until the next permit renewal. Your reasoning is based on the fact that major plant improvements are currently under construction, and will not be complete until January 2013. Per our understanding, MVSD will be installing two (2) new 30 MGD contact clarifiers and a recarbonation system.

The current maximum pH limit of 11.0 was originally authorized under a policy which is no longer in effect. Water quality standards require pH to be maintained within a range of 6.5 – 9.0, which is why the current pH limit will be lowered this permit cycle.

The new permit will contain an interim table and a final table for Outfall 001 to allow MVSD time to transition from the 11.0 limit to the 9.0 limit. The interim period affords MVSD a 36-month timeframe before the maximum pH limit of 9.0 becomes effective. Since the new permit will not go effective until sometime in 2012, the limit of 9.0 will not become effective until sometime in 2015, which is well beyond the anticipated construction completion date of January 2013.

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

Respectfully,



Tomás Parry  
Environmental Engineer  
Division of Surface Water

TP/cs

cc: Matthew Blair

File: Industrial/PC/MVSD