



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

February 12, 2008

RE: TRUMBULL COUNTY
LIBERTY TOWNSHIP
OBLATE SISTERS OF THE SACRED HEART
NPDES PERMIT NO. OH0126004
OHIO EPA PERMIT NO. 3PR00200

Sister Teresina Rosa
Oblate Sisters of the Sacred Heart Institute
50 Warner Road
Hubbard, Ohio 44425

Dear Sister Teresina:

An inspection was conducted by the undersigned of the sanitary wastewater treatment plant serving the above referenced facility on January 8, 2008. 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.

Please note that the NPDES permit is set to expire on October 31, 2008. Pursuant to state and federal regulations, a renewal application must be filed 180 days prior to the date of expiration.

Inspection Findings/Compliance Status

The current 2400 gpd treatment system consists of a trash trap, extended aeration activated sludge "package" plant, final settling tank, slow surface sand filtration, and chlorination/dechlorination. The facility discharges to a tributary of Crab Creek.

At the time of the inspection, the operation and maintenance of the treatment system was unsatisfactory. As evidenced by the enclosed pictures, the facility had apparently experienced an upset condition, resulting in the overflow of sludge onto the ground surface. A telephone call was made to your contact operator, Valley Environmental Labs, to apprise them of the situation. In addition, the following deficiencies were communicated to Valley as requiring immediate corrective actions:

1. One of the surface sand filters was ponded. The other unit has a significant accumulation of sludge.
2. One of the blower units was inoperative due to a missing blower.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, January 2006 – January 2008, indicate 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:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.18	3/1/2007
March 2007	001	Nitrogen, Ammonia (NH3)	7D Conc	4.5	5.18	3/1/2007
March 2007	001	Nitrogen, Ammonia (NH3)	30D Qty	0.03	.05049	3/1/2007
March 2007	001	Nitrogen, Ammonia (NH3)	7D Qty	0.04	.05049	3/1/2007
March 2007	001	Dissolved Oxygen	1D Conc	6.0	5.6	3/6/2007
March 2006	001	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.37	3/1/2006
March 2006	001	Nitrogen, Ammonia (NH3)	30D Qty	0.03	.03144	3/1/2006
August 2007	001	Dissolved Oxygen	1D Conc	6.0	2.1	8/1/2007

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 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.***
2. Pursuant to Ohio Administrative Code (OAC) 3745-7-02, you are required to have a contract with your certified operator. 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. A copy of the signed contract must be submitted to this office.

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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/ams

Enclosure: Pictures

cc: Steve Kramer, Trumbull County Health Department

