



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

January 30, 2012

RE: TRUMBULL COUNTY
CITY OF GIRARD WWTP
COMPLIANCE EVALUATION INSPECTION
OHIO EPA PERMIT NO. 3PD00010
NPDES PERMIT NO. OH0025364

Mayor James Melfi and Council
City of Girard
100 West Main Street
Girard, OH 44420

Dear Mayor Melfi and Council:

Ohio EPA performed a compliance evaluation inspection on January 4, 2012, at the above-referenced facility. Messrs. Howard Zickefoose and Mike Scoville represented the City of Girard, and Mr. Chris Moody and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment system, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The wet-stream processes of the 5.0 MGD treatment plant consist of preliminary treatment, primary clarification, trickling filter secondary treatment process, final clarification, chlorine disinfection, and dechlorination. Waste sludge from the facility is anaerobically digested, dewatered in a belt filter press, and hauled to a licensed solid waste landfill for disposal. Treated effluent is discharged to Little Squaw Creek.

Wet-weather storage is provided in an off-line retention basin. The facility also has an internal secondary treatment process bypass at Station 602, which is tributary to Outfall 001. There is one identified Combined Sewer Overflow (CSO) in the collection system.

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

1. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory.
2. Leaks were observed in the grit tanks. Mr. Zickefoose explained that the leaks had been repaired in the past, but that they were an ongoing problem. Failure to maintain treatment equipment is a violation of Part III, 3 of the NPDES permit.
3. Covers were not observed on the primary clarifier chain sprockets. These units should be covered and protected. After the inspection, Mr. Zickefoose emailed photographs to this office on January 18, 2012 documenting that the covers had been reinstalled.

4. The time on the effluent totalizer is off by one hour. Please adjust the time.
5. Heavy solids buildup was observed in the chlorine contact tank.
6. Part II, BB of the facility's NPDES permit requires that an outfall sign be constructed at the treatment plant's final Outfall 001 by no later than four months after the effective date of the permit. During the inspection, no such sign was noted. Additionally, while an outfall sign was observed at CSO Outfall 003, the lettering did not meet the 2-inch minimum size requirement. After the inspection, Mr. Zickefoose emailed photographs to this office on January 18, 2012, documenting that a new sign had been posted at Outfall 001, and a new sign with the properly-sized lettering had been installed at CSO Outfall 003.
7. The SCADA display was indicating high values for pH and low values for Dissolved Oxygen. When this was pointed out to Mr. Zickefoose, he indicated that the sensors for those meters were broken.
8. A visual observation of the plant effluent revealed evidence of some solids carryover in the discharge. However, no adverse impact was evident within the mixing zone and downstream segments of Little Squaw Creek.

A review of the facility's electronic discharge monitoring reports (eDMRs) received by Ohio EPA for the period October 2010 – December 2011 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2010	001	01119	Copper, Total Recovera	30D Conc	20	22.	10/1/2010
March 2011	001	01119	Copper, Total Recovera	30D Qty	0.38	.39957	3/1/2011
April 2011	001	00530	Total Suspended Solids	30D Qty	568	607.164	4/1/2011
May 2011	001	00530	Total Suspended Solids	7D Qty	852	1003.94	5/1/2011
June 2011	001	39100	Bis(2-ethylhexyl) Phth	30D Conc	1.8	14.	6/1/2011
June 2011	001	39100	Bis(2-ethylhexyl) Phth	30D Qty	0.034	.21389	6/1/2011
July 2011	001	01119	Copper, Total Recovera	30D Conc	20	27.1	7/1/2011
August 2011	001	39100	Bis(2-ethylhexyl) Phth	30D Conc	1.8	23.975	8/1/2011
August 2011	001	39100	Bis(2-ethylhexyl) Phth	30D Qty	0.034	.27962	8/1/2011
September 2011	001	00552	Oil and Grease, Hexane	1D Conc	10	24.	9/2/2011
October 2011	001	00552	Oil and Grease, Hexane	1D Conc	10	15.5	10/6/2011
October 2011	001	00552	Oil and Grease, Hexane	1D Conc	10	17.7	10/17/2011
December 2011	001	39100	Bis(2-ethylhexyl) Phth	30D Conc	1.8	10.9	12/1/2011
December 2011	001	39100	Bis(2-ethylhexyl) Phth	30D Qty	0.034	.21621	12/1/2011
December 2011	001	00530	Total Suspended Solids	7D Qty	852	914.188	12/15/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00010*MD	October 2010	001	31616	Fecal Coliform			AK	10/27/2010
3PD00010*MD	October 2010	001	31616	Fecal Coliform			AK	10/14/2010
3PD00010*MD	February 2011	003	74063	Overflow Volume			AD	2/28/2011

Based on the submitted data, the City of Girard is considered to be in significant noncompliance with Bis(2-ethylhexyl) Phthalate. Mr. Zickefoose explained to Ohio EPA during a followup telephone conversation that the city is pulling its Bis(2-ethylhexyl) Phthalate samples through an automatic sampler. Ohio EPA explained that there could be a contamination issue with the plastic tubing used by the sampler. Ohio EPA advised that the City of Girard use glass containers to collect and store future samples, and to collect these samples in accordance with the following language:

Composite samples for Bis(2-ethylhexyl) phthalate shall be comprised of at least three grab samples proportionate in volume to the sewage flow rate at the time of sampling and collected at intervals of at least 30 minutes, but not more than two hours, during an eight hour period that the plant is staffed for sampling. The samples shall be collected in glass to eliminate the potential for contamination from plastic containers; and they shall be collected at such times and locations, and in such fashion, as to be representative of the facility's overall performance.

Please implement this new sample collection technique right away. Should Bis(2-ethylhexyl) Phthalate violations persist, then further actions will be required to evaluate and correct this problem.

The current NPDES permit, which went effective on July 1, 2009, expires on January 31, 2012. Receipt of a timely renewal application authorizes the city to continue its discharge of treated wastewater under this current permit until a new permit is drafted. Based on the findings of the inspection, and the review of the eDMR data, this office anticipates drafting a renewal permit. Once the new NPDES permit is drafted and issued, Ohio EPA advises that the permittee read through it carefully, as 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 conversion period to transition from meeting fecal coliform limits to meeting E.coli limits. Requirements for E.coli, and any other new parameters, will be described in the new permit.

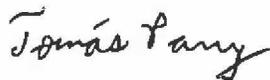
It appears that the facility is still impacted by excessive inflow and infiltration (I/I) in the collection system. We understand that the City is continuing to evaluate sources of the extraneous I/I. The efficiency of the wastewater treatment plant is dependent on the effective maintenance of the collection system. Please be advised that the diverting or bypassing of wastewater from any portion of the treatment facility is prohibited, and may be subject to enforcement action pursuant to Ohio Revised Code Chapter 6111. All bypass

events must be reported as an unauthorized discharge in accordance with Part III, items 11 and 12, of your NPDES permit.

Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement action 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 submit to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to address the above-referenced violations and deficiencies. Your response shall include specific dates for the initiation and completion of this action plan.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Enclosures: Photographs

ec: Chris Moody, OHIO EPA, NEDO, DSW

cc: Howard Zickefoose, Girard WWTP



