



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 19, 2012

RE: TRUMBULL COUNTY
LIBERTY TOWNSHIP
PLEASANT VALLEY CHURCH
NPDES PERMIT NO. OH0139556
OHIO EPA PERMIT NO. 3PR00455

Pastor Don Spayd
Pleasant Valley Church
2055 Pleasant Valley Road
Niles, Ohio 44446

Dear Pastor Spayd:

Ohio EPA conducted an inspection of the wastewater treatment plant at the above-referenced facility on March 12, 2012. You and Mr. Neal Roden represented Pleasant Valley Church, Mr. Steve Kramer represented the Trumbull County Health Department, and the undersigned represented Ohio EPA. The inspection was performed 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 current 3,000 gpd treatment system consists of a trash trap, flow equalization basin, extended aeration activated sludge package plant, final settling tank, slow surface sand filtration, and ultraviolet (UV) disinfection. Treated effluent is discharged to an unnamed tributary of Squaw Creek.

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

1. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the receiving stream.
2. At the time of the inspection, the overall operation and maintenance of the treatment works was marginal. While all treatment processes appeared to be online at the time of the inspection, several pieces of equipment were not functioning.
3. It was noted that one of the flow equalization pumps was inoperable. Please ensure that it is repaired, and returned to service immediately.
4. The color of the mixed liquor in the aeration tank was grey. Typically, when the aerobic bacteria in an activated sludge plant are thriving, the color of the mixed liquor is a chocolate brown color.
5. It was noted that one of the sand filter dose pumps was inoperable, and had been removed for servicing. Please ensure that it is repaired and returned to service immediately.
6. Please provide documentation that the UV disinfection system is functional. If it is not, please ensure that it is repaired immediately, as the disinfection season begins May 1 and continues until October 31.
7. Please provide documentation describing when the plant's metering equipment was last calibrated. Metering equipment should be calibrated on a yearly basis.

8. Operation and maintenance activities should be documented in a bound and numbered log book. Loose sheets are not acceptable as the sole means of recording plant activities. Additionally, maintenance personnel shall include their arrival time, departure time, and initials with each entry.
9. Please install stone riprap around the sand filter splash pads to prevent the development of preferential flow paths in the filter beds.
10. Portions of the sand filter concrete walls were deteriorating. Please ensure that they are repaired.
11. It was noted that construction of the improvements required in Part I, C of the NPDES permit had been completed since the last inspection.

A review of the facility's electronic discharge monitoring reports (eDMRs) received by Ohio EPA for the period November 2008 – February 2012 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
December 2009	001	00530	Total Suspended Solids	1D Conc	18	24.	12/8/2009
December 2009	001	00530	Total Suspended Solids	1D Qty	0.20	.38843	12/8/2009
December 2009	001	00530	Total Suspended Solids	30D Qty	0.14	.14629	12/1/2009
December 2011	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	12.7	12/15/2011
December 2011	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	12.7	12/1/2011

The facility's current NPDES permit expires on August 31, 2012. A timely renewal application was received by this office on January 10, 2012. Based on the results of the eDMR review and the inspection findings, 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 12-month conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. Monitoring requirements for E. coli, and any other new parameters, will be described in the new permit.

Our review also noted that Valley Environmental Labs, Inc. is currently submitting the eDMR data for the facility. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 Code of Federal Regulations (CFR) 122.22". 40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

A person is a duly authorized representative 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.

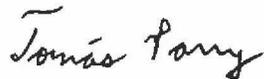
Part II, A of the NPDES permit requires that Pleasant Valley Church designate an operator of record for the facility, and that Ohio EPA be notified of this designation. This office has no documentation indicating that Valley Environmental Labs, Inc. has been retained as the operator of record for the facility.

Based on the requirements outlined in 40 CFR 122.22, Valley Environmental Labs, Inc. may not submit eDMR data on behalf of Pleasant Valley Church. To meet these requirements, please complete and submit to this office the enclosed Operator of Record Notification (ORC) form.

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 14 days' receipt of this notification, as to the actions taken or proposed to address the above-referenced violations and/or deficiencies. Your response shall include specific dates for initiation and completion of this action plan. 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 at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs

Enclosures: ORC Form

Cc: Steve Kramer RS, Trumbull County Health Department
Valley Environmental Labs, Inc.



