



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 24, 2012

RE: TRUMBULL COUNTY
VIENNA TOWNSHIP
TRUMBULL COUNTY VIENNA WWTP
NPDES PERMIT NO. OH0097993
OHIO EPA PERMIT NO. 3PG00144

Mr. Rex Fee, Executive Director
Trumbull County Sanitary Engineers
7500 Anderson Avenue, N.E.
Warren, Ohio 44484

Dear Mr. Fee:

Ohio EPA conducted a compliance evaluation inspection at the above-referenced facility on April 19, 2012. Ms. Trudy Angles represented the Trumbull County Sanitary Engineers and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment works, and evaluate the facility's compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The treatment system components consist of an airlift pump station, 18,980 gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration and UV disinfection. Final effluent is discharged to an unnamed tributary of Squaw Creek.

The following observations and/or deficiencies were noted during the inspection:

1. At the time of the inspection, the overall operation of the treatment processes and equipment appeared to be satisfactory.
2. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the receiving stream.
3. The color of the mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
4. Please provide documentation describing when the metering equipment was last calibrated.
5. Foaming was observed in the aeration tank.
6. The final clarifier is not settling sludge in an efficient manner.
7. One of the sand filter dose pumps did not function when it was cycled. Please ensure that both sand filter dose pumps remain operational.
8. Heavy sludge deposits were observed in the sand filters.
9. Please ensure that maintenance personnel include their arrival times **and** departure times in the log books.

A review of the facility's monthly electronic discharge monitoring reports (eDMRs) from January 2010 – March 2012 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

TRUMBULL COUNTY VIENNA WWTP
 APRIL 24, 2012
 PAGE 2 OF 4

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2010	001	00530	Total Suspended Solids	30D Conc	12	15.6666	10/1/2010
October 2010	001	00530	Total Suspended Solids	7D Conc	18	24.	10/15/2010
February 2011	001	00530	Total Suspended Solids	30D Conc	12	13.	2/1/2011
February 2011	001	00530	Total Suspended Solids	7D Conc	18	20.	2/22/2011
August 2010	001	00530	Total Suspended Solids	30D Conc	12	22.3333	8/1/2010
August 2010	001	00530	Total Suspended Solids	7D Conc	18	29.	8/8/2010
April 2010	001	80082	CBOD 5 day	30D Qty	0.72	.75246	4/1/2010
April 2010	001	80082	CBOD 5 day	7D Qty	1.1	1.43679	4/1/2010
June 2010	001	00530	Total Suspended Solids	30D Qty	0.86	1.44966	6/1/2010
June 2010	001	00530	Total Suspended Solids	7D Qty	1.3	1.44966	6/8/2010
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.49	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.49	5/8/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.14	.28797	5/1/2011
May 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.22	.28797	5/8/2011
May 2011	001	31648	E. coli	30D Conc	161	350.	5/1/2011
August 2011	001	00530	Total Suspended Solids	30D Conc	12	20.	8/1/2011
August 2011	001	00530	Total Suspended Solids	7D Conc	18	20.	8/22/2011
August 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	14.1	8/1/2011
August 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	14.1	8/22/2011
August 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.14	.39493	8/1/2011
August 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.22	.39493	8/22/2011
August 2011	001	31648	E. coli	30D Conc	161	2070.	8/1/2011
August 2011	001	31648	E. coli	7D Conc	362	2070.	8/22/2011
October 2011	001	31648	E. coli	30D Conc	161	3269.86	10/1/2011
October 2011	001	31648	E. coli	7D Conc	362	6600.	10/15/2011
October 2011	001	31648	E. coli	7D Conc	362	1620.	10/22/2011
November 2011	001	00530	Total Suspended Solids	30D Qty	0.86	1.06699	11/1/2011
April 2011	001	00530	Total Suspended Solids	30D Qty	0.86	.91446	4/1/2011
April 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	5.4	4/21/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	12.1	7/1/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	12.5	7/15/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	11.7	7/22/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.14	.33806	7/1/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.22	.39269	7/15/2011
July 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.22	.28342	7/22/2011
July 2011	001	00300	Dissolved Oxygen	1D Conc	6.0	3.5	7/5/2011
July 2011	001	31648	E. coli	30D Conc	161	6528.70	7/1/2011
July 2011	001	31648	E. coli	7D Conc	362	11520.	7/15/2011
July 2011	001	31648	E. coli	7D Conc	362	3700.	7/22/2011
January 2012	001	00530	Total Suspended Solids	30D Conc	12	16.	1/1/2012
January 2012	001	00530	Total Suspended Solids	7D Conc	18	22.	1/1/2012
January 2012	001	00530	Total Suspended Solids	30D Qty	0.86	2.1408	1/1/2012
January 2012	001	00530	Total Suspended Solids	7D Qty	1.3	2.96441	1/1/2012
January 2012	001	00530	Total Suspended Solids	7D Qty	1.3	1.31718	1/8/2012

TRUMBULL COUNTY VIENNA WWTP
 APRIL 24, 2012
 PAGE 3 OF 4

March 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.32	.35059	3/1/2011
June 2011	001	00530	Total Suspended Solids	30D Conc	12	15.5	6/1/2011
June 2011	001	00530	Total Suspended Solids	7D Conc	18	24.	6/22/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	4.8	6/1/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	8.6	6/22/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.14	.17237	6/1/2011
June 2011	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.22	.30272	6/22/2011
June 2011	001	31648	E. coli	30D Conc	161	4954.99	6/1/2011
June 2011	001	31648	E. coli	7D Conc	362	620.	6/15/2011
June 2011	001	31648	E. coli	7D Conc	362	39600.	6/22/2011

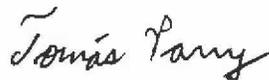
Historically, it appears that the majority of the facility's violations occur during the warmer months of the year. Ms. Angles explained that the plant experiences recurring issues with a lack of settling of the sludge. She also explained that the plant is subject to high wet weather flows, which push flow through the plant much faster due to the lack of a flow equalization (EQ) basin. Please be advised that should permit violations persist, the Trumbull County Sanitary Engineers will be required to install additional treatment components (i.e., Flow EQ) in order to improve the performance of the Vienna treatment works.

Failure to comply with the terms and conditions of the 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 14 days' receipt of this letter, as to the actions that will be taken, or have been taken, 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 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 at (330) 963-1120.

Respectfully,



Tomás Parry
 Environmental Engineer
 Division of Surface Water

TP/cs

Enclosures: Photographs

