



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 11, 2012

RE: TRUMBULL COUNTY  
VIENNA TOWNSHIP  
MACK INDUSTRIES OF PENNSYLVANIA  
CEI  
(NPDES PERMIT 3IN00343)

Mr. David Fagan, GM  
Mack Industries of Pennsylvania, Inc.  
2207 Sodom-Hutchings Road  
Vienna, OH 44473

Dear Mr. Fagan:

On June 7, 2012, a Compliance Evaluation Inspection (CEI) was conducted at Mack Industries. Present during the inspection were you, Mr. Jeff Solvesky, and Mr. Dave Beltz, representing Mack Industries; and this writer, of the Ohio EPA. The facility is located at 2207 Sodom-Hutchins Road, Vienna Township.

The purpose of the inspection was to evaluate the wastewater treatment plant (WWTP)'s operation and maintenance condition, and its compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit. The most recent CEI conducted on the Mack Industries WWTP was on March 31, 2011.

During the June 7<sup>th</sup> inspection, the following observations were made, and items discussed:

- 1) The manufacturing process conducted at the facility remains the same as the previous inspection, with the exception that production volume is down approximately 40 to 50%. Mack is a concrete manufacturing facility, which utilizes forms and batch concrete to make finished products. Typical concrete products manufactured include manholes, barriers, and sound barriers.
- 2) At the time of the March 31, 2011 inspection, there were approximately 50 persons employed at the facility. Currently there are approximately 37 employees.
- 3) Industrial wastewater generated at the facility is collected in the production areas, and hauled to two sedimentation basins (in series) at the rear of the property, where it is allowed to settle, prior to discharging down a swale and spillway to Yankee Creek.
- 4) Production area industrial wastewater is generated during cleanout/rinsing of concrete mixers, and in concrete core drilling areas.
- 5) At the time of the June 7<sup>th</sup> inspection, the sanitary sewage treatment system (STA 601) exhibited the following characteristics:
  - a) The trash trap contents were typical, and no pumping is needed.

- b) Flow equalization (EQ) contents were well aerated, were turbid gray in color, and were at a higher level. Flow EQ tank pumps were in the 'AUTO' position, and operated when manually tested. The high-level alarm was also operational when manually tested.
- c) Contents of the extended aeration tank were well aerated, and were a watery grayish-brown in color. The return activated sludge (RAS) line was operating, returning almost clear water.

Contents of the aeration tank are continuously aerated. As was discussed during the inspection, this office has no objection to the aeration tank blowers being put on a timer. However, the timer should be set such that the blowers are off only a portion of each hour, not for an extended amount of time (not as ON during working hours, and OFF at night). Your certified operator will have to determine the optimum hourly ON/OFF ratio.

- d) Settling tank contents were below the effluent trough, and the trough was clean and free of solids. The skimmer was operating, returning clear water to the aeration tank.
- e) Both pumps in the surface sand filter dosing station were in the 'AUTO' mode, and operated satisfactorily when manually tested. The high water level alarm operated satisfactorily when manually tested.
- f) The north cell of the surface sand filter was in use. Sand in both filter cells was clean, free of vegetative growth, and was raked level.
- g) The UltraViolet (UV) disinfection unit was in operation.
- h) Treated effluent is discharged to a pond on-site.
- i) Average daily sanitary flow to the WWTP is approximately 200 gallons.
- j) Cardinal Labs provide sample collection bottles to Mack Industries, and Mack personnel collect the wastewater samples and transport the samples back to Cardinal Labs for analysis. A chain of custody form is utilized with the sample collection, transport, and transfer process.
- k) Analytical results are forwarded to Mack Industries, and Mack Industries enters and pins the electronic Discharge Monitoring Reports (eDMR) data.
- l) Please be advised that the eDMR data entered must be pinned by a licensed (Class A or greater) wastewater operator, as per the conditions contained in the NPDES permit issued to the facility.
- m) An Operator of Record (ORC) Notification Form (EPA 5121) is to be on file with Ohio EPA, indicating the licensed operator responsible for operating the Mack Industries WWTP, and pinning the data submitted.

A review of the eDMR as reported to the Ohio EPA for the Mack Industries WWTP, during the period of April 1, 2011, through June 1, 2012, found the following NPDES permit violations for the facility:

**MACK INDUSTRIES  
 NPDES PERMIT NO. 3IN00343  
 NUMERIC EFFLUENT LIMITATION VIOLATIONS  
 (APRIL 1, 2011 – JUNE 1, 2012)**

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2011	601	E. coli	30D Conc	161	1100.	8/1/2011
August 2011	601	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	11.9	8/1/2011

\*\* Additionally, there were Reporting Frequency Violations found for STA 601 for Aug. 2011, as no data was found for Flow.

**REPORTING CODE VIOLATIONS  
 (APRIL 1, 2011 – JUNE 1, 2012)**

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2011	601	00056	Flow Rate			AF	12/27/201
December 2011	601	00056	Flow Rate			AF	12/28/201
December 2011	601	00056	Flow Rate			AF	12/29/201
December 2011	601	00300	Dissolved Oxygen			AF	12/30/201
December 2011	601	00400	pH			AF	12/30/201
December 2011	601	80082	CBOD 5 day			AF	12/30/201
			Nitrogen, Ammonia (NH3-N)				
December 2011	601	00610				AF	12/30/201
December 2011	601	00530	Total Suspended Solids			AF	12/30/201

\*\* *AF - Sample Site Inaccessible Due to Flooding or Freezing: Use this code if a sample could not be collected because the designated sampling site was flooded or frozen-over. This code should be used for all parameters required to be sampled at the site on the day that it was inaccessible.*

Proper operation and maintenance practices which will enable Mack Industries to continuously meet its NPDES Permit effluent limits should continue to be implemented. Any deficiencies outlined in the above report need to be satisfactorily addressed, and this office informed, in writing, when the deficiencies are corrected.

A copy of this inspection report is being forwarded to the Trumbull County Health Department. If you have any comments or questions about this document, you may contact me at (330) 963-1110.

Respectfully,



Charles E. Allen  
 Environmental Engineer  
 Division of Surface Water

CEA/cs

cc: Trumbull County Health Dept.