



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 13, 2012

RE: TRUMBULL COUNTY
KINSMAN TOWNSHIP
BOYD'S KINSMAN HOME
NPDES PERMIT NO. OH0126152
OHIO EPA PERMIT NO. 3PR00208

Paula Ruby, Administrator
Boyd's Enterprises, Inc.
P.O. Box 315
Kinsman, Ohio 44428

Dear Ms. Ruby:

Ohio EPA and the Trumbull County Health Department performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on July 5, 2012. Mr. Paul Vitko represented Boyd's Family Home, Mr. Steve Kramer represented the Trumbull County Health Department, and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The existing treatment system components consist of a trash trap, 5,700-gpd extended aeration activated sludge aeration process, final clarifier, slow surface sand filters, and chlorination/dechlorination chamber. Treated effluent is discharged to Sugar Creek.

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

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment components appeared to be in working order.
2. The color of the mixed liquor in the aeration tank was chocolate brown, which is indicative of a healthy bacterial population.
3. There was a large amount of visible suspended solids in the clarifier.
4. Heavy amounts of suspended solids were observed exiting the clarifier through the weir trough. The facility would benefit from a flow equalization basin to help store excess wastewater during periods of high flow.
5. Heavy sludge deposits and ponded water was observed on the sand filters. Please ensure that the sand filters are cleaned, raked, and leveled on a regular basis.
6. The sand filters are not protected (i.e., lockable covers, perimeter fencing, etc.) from unauthorized access
7. The final effluent exiting the disinfection chamber was relatively clear.

8. Please provide documentation describing how often your designated plant operator, Mr. Douglas Jones, is visiting the treatment plant. Please note that Boyd's Family Home is classified as a Class A wastewater treatment works. Pursuant to Ohio Administrative Code 3745-7-04, operators of Class A wastewater treatment works are required to visit the plant twice a week for a minimum of one-hour total.

9. A bound and numbered logbook should be used to record all operation and maintenance activities at the plant. Plant operation and maintenance personnel shall record the date, arrival/departure times, a description of the work performed, and their initials.

10. Part II, I of the facility's NPDES permit requires that an outfall sign be erected at the outfall point by no later than four months from the effective date of the permit, which was February 1, 2010. No such sign was observed during the inspection. Please refer to the above-referenced part of the NPDES permit for specific instructions regarding the sizing, positioning, and what information must be displayed on the sign.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period August 2009 through June 2012, indicated violations of the terms and conditions contained in the NPDES application. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2011	001	00530	Total Suspended Solids	30D Conc	12	32.	12/1/2011
December 2011	001	00530	Total Suspended Solids	30D Qty	0.26	.52687	12/1/2011
December 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	7.41	12/1/2011
December 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.10	.122	12/1/2011
December 2011	001	80082	CBOD 5 day	30D Conc	10	17.	12/1/2011
December 2011	001	80082	CBOD 5 day	30D Qty	0.22	.2799	12/1/2011
December 2011	001	00530	Total Suspended Solids	1D Conc	18	32.	12/8/2011
December 2011	001	00530	Total Suspended Solids	1D Qty	0.39	.52687	12/8/2011
December 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	6.75	7.41	12/8/2011
December 2011	001	80082	CBOD 5 day	1D Conc	15	17.	12/8/2011
December 2011	001	00300	Dissolved Oxygen	1D Conc	5.0	4.4	12/8/2011

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
February 2012	001	00083	Color, Severity	1/Week	1	0	02/08/2012
February 2012	001	01330	Odor, Severity	1/Week	1	0	02/08/2012
February 2012	001	01350	Turbidity, Severity	1/Week	1	0	02/08/2012

In addition to the above, our review of the facility's data reporting procedures noted that Mr. Edward Mosko of Valley Environmental Laboratories, Inc. has been routinely submitting the facility's eDMR data. 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.*

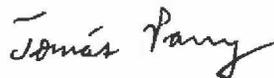
Based on the requirements outlined in 40 CFR 122.22, Mr. Mosko may not submit eDMR data on behalf of Boyd's Family Home.

The Trumbull County Sanitary Engineer's Office has recently submitted to Ohio EPA, a permit-to-install (PTI) application for the construction of upgrades at the Kinsman wastewater treatment plant (WWTP), as well as a sanitary sewer collection system to serve the Kinsman area. Pursuant to Part II, J of the NPDES permit, Boyd's Family Home will be required to properly abandon its WWTP, and connect the entirety of the facility's wastewater stream to the sanitary sewers once they become available and accessible.

Please inform this office, in writing, within 14 days' receipt of this notification, of the actions taken or proposed to address the above-referenced violations and/or deficiencies. Your response shall include specific dates for the 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, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Valley Environmental Labs, Inc.
Steve Kramer, R.S., Trumbull County Health Department

