



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

September 11, 2012

**RE: MAHONING COUNTY
MEANDER POTW
NPDES PERMIT NO. 3PK00011
2013 CEI**

Board of Mahoning County Commissioners
21 West Boardman Street
Youngstown, OH 44503

Gentlemen:

On July 31, 2012, this writer conducted a Compliance Evaluation Inspection (CEI) of the Meander Wastewater Treatment Plant (WWTP). The intent of the inspection was to evaluate the condition of the treatment plant and to review the compliance record for the POTW. Representing the county during the inspection was Joe DeNiro.

Observations

Following are observations made during this inspection:

1. All treatment stages were on line including the first and second aeration system, tertiary clarifier, tertiary sand filters and the disinfection system. One of the clarifiers was offline to replace a drive mechanism.
2. One item discussed during the inspection was the location of the influent sampler inside the grit building. Because the sampler is not explosion-proof, the sampler must be located outside or in a more ventilated area. Mr. DeNiro indicated that he was in the process of moving the sampler outside. The sampler must be relocated outside of the grit building as soon as possible, but no later than September 28, 2012
3. The new ultraviolet disinfection system was online at the time of the inspection. Analytical data of effluent samples indicate that the system is operating properly.
4. Mr. DeNiro indicated that the annual preventive maintenance inspection of the oxygen delivery system had been completed. The procedures are contracted out and include the entire oxygen delivery system inclusive of the media towers.

Compliance Review

A review of the compliance record for the Meander WWTP was made for the months covering May 2011 through July 2012. Following is a list of permit limit violations identified for the review period:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	001	Nitrogen, Ammonia	30D Conc	1.9	5.77583	5/1/2011
May 2011	001	Nitrogen, Ammonia	7D Conc	2.85	6.17667	5/1/2011
May 2011	001	Nitrogen, Ammonia	30D Qty	28.8	111.817	5/1/2011
May 2011	001	Nitrogen, Ammonia	7D Qty	43.1	142.035	5/1/2011
May 2011	001	Nitrogen, Ammonia	7D Conc	2.85	9.14333	5/8/2011
May 2011	001	Nitrogen, Ammonia	7D Qty	43.1	134.149	5/8/2011
May 2011	001	Nitrogen, Ammonia	7D Conc	2.85	5.07333	5/15/2011
May 2011	001	Nitrogen, Ammonia	7D Qty	43.1	126.204	5/15/2011
May 2011	001	Nitrogen, Ammonia	7D Qty	43.1	44.8809	5/22/2011
June 2011	001	Nitrogen, Ammonia	7D Conc	2.85	3.88333	6/1/2011
June 2011	001	Nitrogen, Ammonia	7D Qty	43.1	55.8817	6/1/2011
December 2011	001	Total Suspended Solids	7D Qty	454	479.035	12/22/2011

Be advised that violations of the NPDES Permit constitute violations of Ohio Revised Code 6111.07. Also, Paragraph 28 and 29 of the October 22, 2008 Consent Order include stipulated penalties for violations of the seven-day and 30-day limits in the NPDES Permit.

For each first through the fourth consecutive failure to meet any seven-day average effluent limit, the county is to pay a stipulated penalty of seven hundred and fifty dollars (\$750.00) for each violation. Based on the required stipulated penalty, it is estimated that Mahoning County is liable for a penalty of \$3,000.00 for the first four seven-day violations of the ammonia limits in May 2011.

For each fifth through the eighth consecutive failure to meet any seven-day average effluent limit, the county is to pay a stipulated penalty of one thousand dollars (\$1000.00) for each violation. Based on this required stipulated penalty, it is estimated that Mahoning County is liable for a penalty of \$4000.00 for the fifth through the eighth ammonia violations in May and June 2011.

For each ninth through the twelve consecutive failures to meet any seven-day average effluent limit, the county is to pay a stipulated penalty of one thousand two hundred fifty dollars (\$1250.00) for each violation. Based on the required stipulated penalty, it is estimated that Mahoning County is liable for a penalty of \$1250.00 for the ninth consecutive ammonia violation in June 2011.

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It is also estimated that Mahoning County is liable for a penalty of \$750.00 for the Total Suspended Solids violation in December 2011.

Finally, based on the stipulated penalty stated in paragraph 29 of the 2008 Consent Order, the county is liable for stipulated penalties of \$1000.00 for the first and \$1,500 for the second 30-day ammonia violations in May 2011. Total penalty associated with the two 30-day violations is \$2,500.

From the above calculations, it is determined that the total stipulated penalty owed by Mahoning County for violations during the period covering May 2011 through July 2012 is \$11,500.00. The 2008 Consent Order states that the county shall immediately and automatically pay the stipulated penalty. If the county has not already submitted a certified check for the stated amount of \$11,500.00, the county must immediately deliver a check for the stated amount made payable to "Treasurer, State of Ohio". The check shall be delivered to the Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215-3400.

You may contact this office at (330) 963-1251, or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this inspection letter.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/cl

cc: Joseph DeSantis, Mahoning County Sanitary Engineer Office
Joe DeNiro, Meander POTW, Mahoning County Sanitary Engineer Office
Rachel DeMuth, Enforcement, DSW, Central Office