



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

September 5, 2012

RE: MAHONING COUNTY  
WASTEWATER  
2013 CEI  
NPDES PERMIT NO. 3PR00442

Mr. George Beaver  
Angels for Animals  
4630 South Range Road  
Canfield, OH 44406

Mr. Beaver:

On July 11, 2012, this writer conducted an inspection of the wastewater treatment system for the Angels for Animals facility. The intent of the inspection was to evaluate the condition of the system and to review the compliance record for the facility.

Observations

1. The treatment system consists of an equalization tank, aeration, clarification, tertiary filtration, a holding pond, and spray irrigation field.
2. The pumps for the equalization tank operate continuously in order to deliver the daily flow over a 24-hr. period. One concern noted during the inspection was the absence of any flow monitoring. The time meters for each equalization pump were inoperable at the time of the inspection. This was the second inspection that identified this problem. Angels for Animals must have a mechanism for monitoring flow. Options discussed during the inspection included repairing the time meters or installing a potable water meter to monitoring water used in the facility.
3. The content of the aeration tank was light brown in color. The contents of the aeration tank should be medium brown in color and should have an earthy odor.
4. The clarifier was satisfactory during the inspection. We discussed cleaning the clarifier by drawing down the water and hosing down the exposed surfaces to remove all accumulated sludge. Old sludge has a tendency to denitrify and float to the surface of a clarifier. By reducing the level of water in the clarifier and hosing down the exposed surfaces, floating sludge on the surface of the clarifier can be prevented from being discharged to the tertiary filters. As discussed during the inspection, the sides of the hopper should be scraped at least twice per week.
5. The east tertiary filter had recently been sealed to repair leaks. New sand was then placed in the filter. There was a question as to whether the sand met the specifications for filter sand. The specification requires that sand shall be clean and washed, with an effective size between 0.4 and 1.0 mm, and with a uniformity coefficient not greater than 3.0. It is recommended that the sieve analysis conform to standard testing procedures for particle size distribution such as the procedures in American Standards of Testing Materials (ASTM) No. C-136.

6. The holding pond was nearly overflowing the banks and appeared to have overflowed in the past. Any discharge from the holding pond other than to the permitted spray irrigation field is a violation of Ohio Revised Code (R.C.) 6111.04.

The holding pond was full because the transfer pump to deliver wastewater to the spray irrigation field was inoperable at the time of the inspection. The transfer pump must be repaired as soon as possible and the wastewater in the pond must be delivered to the spray irrigation field.

7. Previous inspections by this office identified that the spray field was not completely operational. Many of the spray heads did not spray the full length and some of the spray heads could not be found. The spray field must be evaluated and any required repairs must be made so that the system operates as originally approved by this office.

**Compliance Evaluation**

A review of the compliance record was done for the period covering October 2011 through July 2012. The intent of the review was to identify and noncompliance issues during the review period.

Following is a list of monthly reports documented in the Ohio EPA record. These are the dates that Ohio EPA received the reports for each month identified:

Station	Reporting Period	MOR Load Date	Reporting Lab
601	June 2011	7/20/2011	Leetonia
602	June 2011	7/20/2011	Leetonia
601	March 2012	4/20/2012	Leetonia
601	February 2012	3/20/2012	Leetonia
601	January 2012	2/20/2012	Leetonia
601	July 2012	8/9/2012	Leetonia
602	July 2012	8/9/2012	Leetonia

You will note that monthly reports are not on record at Ohio EPA for October 2011, November 2011, December 2011, April 2012, and May 2012. As discussed, Angels for Animals must coordinate with personnel in Columbus to determine why the reports are not on record at Ohio EPA. Until such time as the reports are recorded as received by Ohio EPA, Angels for Animals will be considered in violation of the NPDES Permit.

In addition, the following limit and reporting frequency violations were identified in the compliance record at the time of the review.

**Limit Violations**

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	601	Total Suspended Solids	30D Conc	12.0	21.	6/1/2011
June 2011	601	Nitrogen, Ammonia	30D Conc	1.0	4.27	6/1/2011
June 2011	601	Total Suspended Solids	1D Conc	18.0	21.	6/7/2011
June 2011	601	Nitrogen, Ammonia	1D Conc	1.5	4.27	6/7/2011
January 2012	601	Total Suspended Solids	30D Conc	12.0	15.	1/1/2012
January 2012	601	Nitrogen, Ammonia	30D Conc	1.0	3.66	1/1/2012

January 2012	601	Nitrogen, Ammonia	1D Conc	1.5	3.66	1/10/2012
February 2012	601	Nitrogen, Ammonia	30D Conc	1.0	3.66	2/1/2012
February 2012	601	Nitrogen, Ammonia	1D Conc	1.5	3.66	2/15/2012
March 2012	601	Nitrogen, Ammonia	30D Conc	1.0	4.888	3/1/2012
March 2012	601	Nitrogen, Ammonia	1D Conc	1.5	4.888	3/9/2012
March 2012	601	Chlorine, Total	1D Conc	1.0	.67	3/9/2012

**Frequency Violations**

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2011	601	00056	Flow Rate	1/Day	1	0	06/01/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/02/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/03/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/04/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/05/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/06/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/07/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/08/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/09/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/10/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/11/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/12/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/13/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/14/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/15/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/16/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/17/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/18/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/19/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/20/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/21/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/22/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/23/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/24/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/25/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/26/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/27/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/28/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/29/2011
June 2011	601	00056	Flow Rate	1/Day	1	0	06/30/2011
January 2012	601	00056	Flow Rate	1/Day	1	0	01/01/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/02/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/03/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/04/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/05/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/06/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/07/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/08/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/09/2012
January 2012	601	00056	Flow Rate	1/Day	1	0	01/10/2012

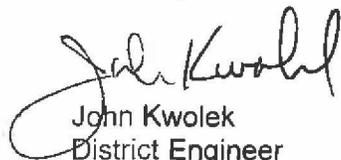


March	2012	601	00056	Flow Rate	1/Day	1	0	03/02/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/03/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/04/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/05/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/06/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/07/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/08/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/09/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/10/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/11/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/12/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/13/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/14/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/15/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/16/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/17/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/18/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/19/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/20/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/21/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/22/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/23/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/24/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/25/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/26/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/27/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/28/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/29/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/30/2012
March	2012	601	00056	Flow Rate	1/Day	1	0	03/31/2012

Be advised that limit and reporting frequency violations are considered violations of Ohio Revised Code (R.C.) 6111.07 and are subject to enforcement action by Ohio EPA. Please provide a response to this letter addressing item 2, 4, 5, 6, and 7 above; and specifying actions that have or will be taken to address each concern. In addition, the response must include efforts taken to verify proper reporting of electronic monthly reports so that all reports are accounted for in the Ohio EPA compliance record system.

You may contact this writer at (330) 963-1251 or at [john.kwolek@epa.state.oh.us](mailto:john.kwolek@epa.state.oh.us) to discuss any questions you may have.

Sincerely,



John Kwolek  
District Engineer  
Division of Surface Water

JK/cs

Cc. Joe Mansky, Mahoning County Department of Health