



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Naily, Director

October 24, 2012

RE: TRUMBULL COUNTY
CITY OF GIRARD WWTP
NPDES PERMIT NO. OH0025364
OHIO EPA PERMIT NO. 3PD00010
COMPLIANCE EVALUATION INSPECTION

Mayor James Melfi and Council
City of Girard
100 West Main Street
Girard, OH 44420

Mayor Melfi and Council:

Ohio EPA performed a compliance evaluation inspection and pretreatment program audit of the above-referenced facility on October 2, 2012 and October 18, 2012. Messrs. Howard Zickefoose and Mike Scoville represented the City of Girard, and Mrs. Donna Kniss and the undersigned represented Ohio EPA. The compliance evaluation inspection was conducted to evaluate the operation and maintenance of the treatment works, and determine the facility's overall compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit. Findings from the pretreatment program audit will be addressed under separate cover from Mrs. Donna Kniss.

The wet-stream processes of the 5.0-MGD treatment plant consist of preliminary treatment, primary clarification, trickling filter secondary treatment process, final clarification, chlorine disinfection, and dechlorination. Waste sludge from the facility is anaerobically digested, dewatered in a belt filter press, and hauled to a licensed solid waste landfill for disposal. Treated effluent is discharged to Little Squaw Creek.

Wet-weather storage is provided in an off-line retention basin. The facility also has an internal secondary treatment process bypass at Station 602, which is tributary to Outfall 001. There is one identified Combined Sewer Overflow (CSO) in the collection system.

At the time of the inspection, the following observations and/or deficiencies were noted:

1. The general operation and maintenance of the treatment processes and equipment appeared to be satisfactory. The maintenance issues identified in correspondence from this office dated January 30, 2012 have since been satisfactorily addressed.
2. The comminutors at the head of the plant have been placed back into operation.
3. Solids buildup was observed in the chlorine contact tank.
4. An observation of the plant effluent revealed evidence of solids carryover in the discharge. However, no adverse impact was evident within the mixing zone and downstream segments of Little Squaw Creek.

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A review of the facility's electronic discharge monitoring reports (eDMRs) received by Ohio EPA for the period January 2012 – October 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2012	001	00530	Total Suspended Solids	30D Conc	30	30.7692	7/1/2012
July 2012	001	00530	Total Suspended Solids	7D Conc	45	51.25	7/15/2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00010*MD	May 2012	901	31616	Fecal Coliform			AK	5/3/2012
3PD00010*MD	May 2012	003	31616	Fecal Coliform			AK	5/7/2012

It appears that the facility is still impacted by excessive inflow and infiltration (I/I) in the collection system. The efficiency of the wastewater treatment plant is dependent on the effective maintenance of the collection system. Please be advised that the diverting or bypassing of wastewater from any portion of the treatment facility is prohibited, and may be subject to enforcement action pursuant to Ohio Revised Code, Chapter 6111. All bypass events must be reported as an unauthorized discharge in accordance with Part III, items 11 and 12, of the NPDES permit.

The City of Girard has recently initiated a flow metering effort to determine the extent of I/I in select portions of the collection system throughout the city. This effort has been initiated in response to the No Feasible Alternative (NFA) language outlined in Part I, C of the NPDES permit, in which the City of Girard is being required to conduct a comprehensive analysis of all feasible alternatives necessary to eliminate the treatment plant bypass and collection system overflow. Please note that Part I, C requires the submittal of a report summarizing the results of this analysis by no later than 12 months from the effective date of the NPDES permit. Further information regarding the implementation of these alternatives can also be found in the above-referenced section of the NPDES permit.

In addition to the NFA language, the City of Girard is also required to submit to this office, within six months of the effective date of the NPDES permit, a report evaluating the ability of the existing treatment works to meet the Escherichia coli (E. coli) monitoring limits that will become effective 12 months after the effective date of the NPDES permit. Please refer to Part I, C of the NPDES permit for additional language regarding E. coli monitoring requirements.

Please note that a Storm Water Pollution Prevention Plan (SWPPP) is required for the facility. Part IV, A of the NPDES permit requires that a SWPPP be submitted to this office by no later than six months from the effective date of the NPDES permit. Please refer to Parts IV, V, and VI of the NPDES permit for further storm water requirements.

Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement action 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 submit to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to address the above-referenced violations and deficiencies.

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Your response shall include specific dates for the initiation and completion of this action plan. Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,

A handwritten signature in cursive script that reads "Tomás Parry".

Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

ec: Donna Kniss, Ohio EPA, DSW, NEDO

cc: Howard Zickefoose, Girard WWTP