Ohio EPA
40 years and moving forward

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

November 19, 2012

RE: TRUMBULL COUNTY
NILES WWTP
NPDES PERMIT NO. OH0026743
OHIO EPA PERMIT NO. 3PD00036

Mayor and Council
City of Niles
34 West State Street
Niles, Ohio 44446

Mayor and Council:

Ohio EPA performed a compliance evaluation inspection of the above-referenced facility on November 8, 2012. Mr. John Nemet represented The City of Niles 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 overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The 6.2-MGD treatment facility consists of influent screening, grit removal, oxidation ditches with integral clarifiers, chlorine disinfection, and dechlorination. Waste sludge is processed through an anaerobic digester and a gravity thickener before it is dewatered in a belt filter press and then hauled away for disposal. Treated effluent is discharged to the Mahoning River.

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 operational.
2. The mixed liquor in the aeration tanks was a chocolate brown color, indicative of a healthy bacterial population.
3. It appears that one of the aeration tanks has a broken diffuser head. Please ensure that the unit is repaired and returned to service.
4. A large amount of floating solids were observed in the settling tanks.
5. Please provide the latest calibration records for the sample refrigerator thermometers, level sensors, and flow meters.
6. One of the mixed liquor pump motors did not have the housing installed. Please replace the housing on the motor.
7. Please ensure that the chemical storage room for the disinfection system is swept, and kept clean.
8. Heavy floating solids, presumably the after-effects from the excessive flows experienced by the plant during Superstorm Sandy, were observed in the chlorine contact chamber. Mr. Nemet indicated that this problem would probably clear up in the near future.
9. While heavy solids were observed in the chlorine contact chamber, there did not appear to be much carryover of the solids to the Mahoning River. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the Mahoning River.

A review of the facility's electronic Discharge Monitoring Reports received by Ohio EPA for the period August 2011 – October 2012 did not indicate any monitoring limit violations. This office did note that the May 2012 fecal coliform sample results were reported as "AH", and that a note was attached to this entry explaining that E. coli samples were taken. It was explained to Mr. Nemet that while the new permit did transition directly into E. coli sampling for the bacteria monitoring, the new permit did not become effective until July 1, 2012. Therefore, the months of May 2012 and June 2012 would have required the fecal coliform sampling. It appears that the City of Niles did report sampling data for fecal coliform in the month of June before transitioning into full-time E. coli sampling in July 2012.

Discussions with Mr. Nemet revealed that the facility is still impacted by excessive inflow and infiltration in the collection system during wet weather. This is evident with the multiple treatment plant bypasses (Station 602) that have been reported since the last inspection. This office understands that the City of Niles has initiated the process of performing a comprehensive analysis of the collection system, and of the treatment plant, in order to determine the best method to eliminate the 602 headworks bypass. This analysis is required as part of the bypass elimination schedule outlined in Part I, C in the current NPDES permit. Please ensure that every effort is made to ensure that compliance with the bypass elimination schedule is achieved.

This office also documented that construction of the 500,000-gallon flow equalization (EQ) basin (PTI No. 714304) on Fairlawn Avenue has been completed. Mr. Nemet explained that the EQ basin is functioning as it was designed, and that there have been no problems since it was placed into operation. Basement flooding in the Fairlawn Avenue area appears to have been greatly reduced with the installation of the basin.

Please submit to this office, within 14 days' receipt of this letter, written documentation describing how the deficiencies outlined in this letter have been, or will be addressed. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that past or present instances of noncompliance are subject to future legal enforcement action pursuant to Chapter 6111 of the Ohio Revised Code.

Should you have any questions regarding this letter, please contact this office at (330) 963-1120.

Respectfully,

Tomás Parry

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

TP/cs

Attachments: Photographs

cc: John Nemet, Niles WWTP