



**Environmental
Protection Agency**

Governor
Lt. Governor
Director

November 13, 2012

RE: TRUMBULL COUNTY
CITY OF HUBBARD WWTP
NPDES PERMIT NO. OH0025810
OHIO EPA PERMIT NO. 3PD00028

Mayor and Council
City of Hubbard
220 West Liberty Street
Hubbard, Ohio 44425

Mayor and Council:

Ohio EPA conducted a compliance evaluation inspection of the above-referenced facility on November 8, 2012. Mr. Randy Fabrizio represented the City of Hubbard and the undersigned represented Ohio EPA. The 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.

The current treatment system treats an average daily flow of 2.1 MGD, and consists of mechanical bar screening, aerated grit removal, activated sludge treatment process, secondary clarification, chlorine disinfection, dechlorination, and post aeration. Waste sludge is processed through an aerobic storage tank and dewatered in a belt filter press before being hauled away for disposal. Treated effluent is discharged to Little Yankee Creek.

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

1. The overall operation and maintenance of the treatment works was satisfactory.
2. Please provide the date the last calibration was performed on the clarifier level monitor.
3. One of the mechanical aerators was out of service, and in the process of being repaired. This office is aware that the aerator units are regularly being serviced and/or repaired at the facility. Ohio EPA recommends that the City of Hubbard implement a long-term program to rebuild each aerator unit.
4. The City of Hubbard has recently installed a new disinfection system (PTI No. 870861). The facility removed its gaseous chlorine and gaseous sulfur dioxide feed system, and now utilizes a liquid sodium hypochlorite and liquid sodium bisulfite feed system. The City has reported no difficulties in meeting its E. coli limits with the new disinfection technology.
5. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the receiving stream.

MAYOR AND COUNCIL
 CITY OF HUBBARD
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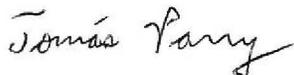
A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period November 2011 – October 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00028*JD	May 2012	001	01119	Copper, Total Recovera	30D Conc	17	19.	5/1/2012
3PD00028*JD	May 2012	001	61942	pH, Minimum	1D Conc	6.5	6.48	5/25/2012
3PD00028*JD	July 2012	001	61942	pH, Minimum	1D Conc	6.5	6.4	7/2/2012
3PD00028*JD	July 2012	001	61942	pH, Minimum	1D Conc	6.5	6.48	7/26/2012
3PD00028*JD	October 2012	001	61942	pH, Minimum	1D Conc	6.5	6.25	10/22/2012
3PD00028*JD	October 2012	001	61942	pH, Minimum	1D Conc	6.5	6.43	10/25/2012
3PD00028*JD	October 2012	001	61942	pH, Minimum	1D Conc	6.5	6.47	10/26/2012

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that will be taken, or have been taken, to address the above-referenced deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that violations of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code.

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:bo

pc: Randy Fabrizio, Hubbard WWTP