



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

December 7, 2012

RE: TRUMBULL COUNTY
HUBBARD TOWNSHIP
WATSON'S TOWING, INC
5700 YOUNGSTOWN-HUBBARD RD

Ms. Susan Watson
Watson's Towing, Inc.
5700 Youngstown Hubbard Road
Hubbard, Ohio 44425

Ms. Watson:

Ohio EPA conducted an inspection of the wastewater treatment works serving the above-referenced facility on November 8, 2012. Per this office's understanding, you were interested in purchasing the property in 2010, and so this office sent a letter to you on September 24, 2010 outlining what upgrades would be necessary for the wastewater treatment works at the site. Since you went ahead with the purchase of the property, the inspection was conducted to evaluate the performance of the treatment system, and determine if the recommended upgrades were made to the treatment works.

The existing 1,500-gpd treatment works serves two buildings and two mobile homes, and consists of a trash trap, activated sludge aeration tank, clarifier tank, dual-unit slow surface sand filters, and an ultraviolet (UV) disinfection unit. Treated effluent is discharged to an unnamed tributary of Crab Creek.

The following observations and/or deficiencies were noted during the inspection:

1. A fence or other suitable enclosure is necessary around all unlocked treatment units. Lockable covers are also an acceptable alternative to fencing.
2. The color of the mixed liquor in the aeration tank was a chocolate brown, indicative of a healthy bacterial population.
3. A weir trough is necessary in the clarifier/settling tank. A Permit-To-Install (PTI) is not necessary for this.
4. A lid is necessary on the sand filter distribution box.
5. A lockable lid is necessary on the sampling well.
6. Stone riprap is necessary around the sand filter splash pads.

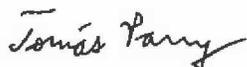
7. The UV unit was installed as was recommended in the last letter from this office. However, it was installed without a PTI from Ohio EPA. PTIs are necessary before any type of change can be made to a wastewater treatment system. Please consult with a registered, professional engineer to prepare an As-Built PTI application package.
8. The final effluent appeared to be clear, and did not appear to be causing any immediately noticeable, adverse impacts to the receiving stream.
9. The site has been graded to direct surface runoff around the treatment works.
10. A trench drain in the vehicle maintenance building was observed discharging into a tank. When the tank lid was opened, it appeared to be full, and a discharge pipe was observed. You must determine what the tank is being used for, what flow it is collecting, and where the flow is being conveyed to. Once you have obtained this information, please provide it to this office for further review and guidance on any applicable regulations for the discharge.

In addition to the inspection findings, this office also noted that Watson's Towing, Inc. is discharging treated wastewater to waters of the state without a valid National Pollutant Discharge Elimination System (NPDES) permit. Please complete and submit the enclosed NPDES permit application forms to this office, along with a \$200 application fee check made payable to "Treasurer – State of Ohio". This office will draft, and then issue an NPDES permit once your application has been received and processed.

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 violations and deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that past or current acts of noncompliance can continue as subjects of future enforcement actions.

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/cs

Attachments: NPDES Application Form 1
NPDES Application Form 2E
Antidegradation Addendum
Photos

cc: Richard Curl, R.S., Trumbull County Health Dept.

