



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

January 2, 2013

RE: HIRAM WWTP  
PORTAGE COUNTY  
PERMIT NO. 3PB00020

Mayor and Council  
Village of Hiram  
P.O. Box 65  
Hiram, Ohio 44234

Dear Mayor and Council:

On December 3, 2012, an inspection of the above referenced facility was conducted to obtain and review information for drafting a renewal of the facility's NPDES wastewater permit. The facility was represented by Messrs. Robert Simon, Assistant Superintendent and Dan Vair, Wastewater Operator. The purpose of the inspection was to: (1) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit; and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted:

1. The plant design of the wastewater treatment system is 0.20 MGD.
2. In accordance with Ohio Administrative Code 3745-7-04, the sewage treatment facility is classified as a Class I facility. The permittee shall ensure that the treatment works Operator of Record is physically present at the facility three times per week for a minimum of one and a half hours per week.
3. Mr. Simon indicated that the plant is currently averaging 120,000 gpd when school is in and 80,000 gpd when school is out.
4. Both Messrs Simon and Vair hold a Class II Wastewater Operators License.
5. The influent sampler is not refrigerated. The influent sampler is required to be refrigerated.
6. Only one of two aeration tanks was in operation.
7. Both digesters were in operation.
8. Mr. Robert Simon is responsible for collecting the samples and reporting the results to Ohio EPA's Surface Water Information Management System.
9. The wastewater treatment collection system has three lift stations.
10. Dalton Sanitary hauls the treatment plant sludge. The sludge is hauled to Newcastle Sanitary Authority WWTP.
11. The effluent sampler's top door and front refrigeration door need replaced. Mr. Simon indicated that the replacement parts are no longer available. Provisions to replace both the influent and effluent samplers should be made in the near future.
12. The final effluent being discharged was clear.
13. No visual impact to the receiving stream was observed.
14. Below is a list of some of the improvement made to the treatment plant since the last inspection:
  - a. A new comminutor was installed approximately two years ago

- b. Three out of three influent pumps were rebuilt
  - c. All new floats were installed in the influent pump station – five total
  - d. 75% of the diffusers along with the waste return line, and new brackets were replaced in the west aeration tank within the past 2-3 years
  - e. New stainless steel weirs and holding brackets were installed in the settling tanks 3-4 years ago
  - f. Both skimmers were rebuilt in the Summer of 2012
15. Mr. Matt Kohn, Superintendent, is no longer with the Village of Hiram. It was understood that he left in August 2012. Due to the aging of the existing treatment plant, ie. increased maintenance needs of the treatment plant, and the other non wastewater treatment duties of the existing two wastewater treatment plant operators, the Agency is concerned that the existing staffing levels may be deficient at times.
16. Please note the following includes some of the changes to the facility NPDES permit:
- a. A schedule of compliance will be placed in the permit renewal which requires the facility to meet E. Coli limits in the final table for outfall monitoring station 3PB00020001.
  - b. Total dissolved solids monitoring has been added to station 3PB00020001.
  - c. The limit for copper at sampling station 3PB00020001 has been removed.
  - d. The monitoring frequency for copper at sampling station 3PB00020001 has been increased from quarterly to monthly.
  - e. Quarterly monitoring for copper and hardness has been added to sampling stations 3PB00020801 and 3PB00020901.
  - f. Biological monitoring language has been included in Part II of the permit. The language will require biological monitoring to be conducted in Silver Creek to assess its attainment status.
  - g. Pollution Prevention Plan language has been included in Part II of the permit. The language requires the Village of Hiram to submit a Copper Pollution Prevention Plan that will assure that the effluent total recoverable copper will not exceed the Inside Mixing Zone Maximum (IMZM) concentration of 79µg/l.
17. Limits for total recoverable silver have been added to sampling station 3PB00020001.

This office has recently reviewed your self-monitoring reports covering the period September 1, 2007 through November 30, 2012, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

#### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01119	Copper, Total Recoverable	30D Conc	26.5	29.5	6/1/2008
001	01119	Copper, Total Recoverable	30D Conc	14	45.	6/1/2010
001	01119	Copper, Total Recoverable	30D Qty	0.0106	.01141	6/1/2010
001	01119	Copper, Total Recoverable	1D Conc	22	45.	6/2/2010
001	01119	Copper, Total Recoverable	30D Conc	14	48.	8/1/2010
001	01119	Copper, Total Recoverable	30D Qty	0.0106	.01145	8/1/2010
001	01119	Copper, Total Recoverable	1D Conc	22	48.	8/11/2010
001	01119	Copper, Total Recoverable	30D Conc	14	28.	12/1/2010
001	01119	Copper, Total Recoverable	1D Conc	22	28.	12/8/2010

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01119	Copper, Total Recoverable	30D Conc	14	34.	3/1/2011
001	01119	Copper, Total Recoverable	30D Qty	0.0106	.02651	3/1/2011
001	50092	Mercury, Total (Low Level)	30D Conc	12	16.	3/1/2011
001	50092	Mercury, Total (Low Level)	30D Qty	0.0000	.00001	3/1/2011
001	01119	Copper, Total Recoverable	1D Conc	22	34.	3/16/2011
001	01119	Copper, Total Recoverable	1D Qty	0.0167	.02651	3/16/2011
001	01119	Copper, Total Recoverable	30D Conc	14	23.	6/1/2011
001	01119	Copper, Total Recoverable	1D Conc	22	23.	6/8/2011
001	01119	Copper, Total Recoverable	30D Conc	14	28.	8/1/2011
001	01119	Copper, Total Recoverable	1D Conc	22	28.	8/17/2011
001	01119	Copper, Total Recoverable	30D Conc	14	32.	12/1/2011
001	01119	Copper, Total Recoverable	30D Qty	0.0106	.03016	12/1/2011
001	01119	Copper, Total Recoverable	1D Conc	22	32.	12/7/2011
001	01119	Copper, Total Recoverable	1D Qty	0.0167	.03016	12/7/2011
001	01119	Copper, Total Recoverable	30D Conc	14	28.	6/1/2012
001	01119	Copper, Total Recoverable	1D Conc	22	28.	6/13/2012
001	01119	Copper, Total Recoverable	30D Conc	14	32.	8/1/2012
001	01119	Copper, Total Recoverable	30D Qty	0.0106	.0109	8/1/2012
001	01119	Copper, Total Recoverable	1D Conc	22	32.	8/26/2012

No frequency or code violations were noted.

**Please notify this office in writing, within 14 days receipt of this letter, of your intentions to address items 5 , 11 and the replacement of Mr. Kohn's position. The letter should include dates, either actual or proposed, for completion of the actions.**

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

The facility's renewal NPDES is currently being drafted and will be Public Noticed in the near future. At this time, you will have a 30-day period to evaluate this permit and comment in writing any concerns you may have.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/cs

cc: Robert Simon, Assistant Superintendent