



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 5, 2013

RE: TRUMBULL COUNTY
VILLAGE OF LORDSTOWN
IMPERIAL MHP
NPDES PERMIT NO. OH0107450
OHIO EPA PERMIT NO. 3PV00062

Mr. Ronald Radka, President
Imperial Communities, Inc.
3293 Ellsworth-Bailey Road
Warren, OH 44481

Mr. Radka:

Ohio EPA conducted a compliance evaluation inspection of the treatment works serving the above-referenced facility on February 28, 2013. The inspection was performed to evaluate the overall operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

Existing treatment components consist of preliminary treatment (trash traps), 75,000-gpd extended aeration activated sludge process, final settling tank, slow surface sand filtration, and UV disinfection. Sludge handling consists of an aerated sludge holding tank and sludge drying beds. Treated effluent is discharged to an unnamed tributary of Mud Creek.

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

1. The general operation and maintenance of the treatment plant was found to be satisfactory.
2. Please ensure that the O & M logbook includes the time in and time out for every entry.
3. Foaming was observed in the aeration tank.
4. One of the sand filter dose pumps appears to have a broken seal. Please ensure that this pump is repaired.
5. How often is the plant metering equipment being calibrated? Flow meters should be calibrated on a yearly basis. Equipment used for daily measurements (DO, Cl⁻, pH) must be calibrated before each use.
6. A fence or other type of suitable enclosure has still not been installed around the sand filters, despite being mentioned in multiple, past inspection letters.
7. Solids accumulation was observed in the sand filters.

8. Buildup was observed on the clarifier walls.
9. The final effluent appeared to be turbid.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period October 2011 – January 2013 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PV00062*ED	January 2012	001	00530	Total Suspended Solids	7D Conc	18	21.	1/15/2012
3PV00062*ED	July 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.05	7/15/2012
3PV00062*ED	August 2012	001	00530	Total Suspended Solids	7D Conc	18	19.	8/8/2012
3PV00062*ED	September 2012	001	00530	Total Suspended Solids	30D Conc	12	24.5	9/1/2012
3PV00062*ED	September 2012	001	00530	Total Suspended Solids	7D Conc	18	22.	9/1/2012
3PV00062*ED	September 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	6.4	9/1/2012
3PV00062*ED	September 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	12.75	9/1/2012
3PV00062*ED	September 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.57	.84992	9/1/2012
3PV00062*ED	September 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.85	1.69388	9/1/2012
3PV00062*ED	September 2012	001	00530	Total Suspended Solids	7D Conc	18	23.	9/8/2012
3PV00062*ED	September 2012	001	00530	Total Suspended Solids	7D Conc	18	52.	9/15/2012
3PV00062*ED	September 2012	001	00530	Total Suspended Solids	7D Qty	5.1	6.19983	9/15/2012
3PV00062*ED	October 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	4.15	10/1/2012
3PV00062*ED	October 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	4.3	10/1/2012
3PV00062*ED	October 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	4.	10/15/2012
3PV00062*ED	January 2013	001	00530	Total Suspended Solids	7D Conc	18	26.	1/22/2013

The eDMR review indicated that Imperial MHP is in **significant noncompliance** with the terms and conditions of the NPDES permit due to the excessive and recurrent Ammonia and Total Suspended Solids effluent limit violations. As such, you must devise, and then execute, a plan of action to address these recurrent effluent limit violations. Please note that continued violations of the NPDES permit limits will result in the matter being referred to Ohio EPA's legal section for appropriate enforcement action.

Ohio EPA has processed your NPDES renewal application, and will soon public notice a renewal draft permit. Comments on the draft permit should be made in writing, and submitted to Ohio EPA, within 30 days of the public notice date. If comments are received, Ohio EPA will address them prior to issuing the permit as a final action.

There will be a number of changes made to the NPDES permit. One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with

Escherichia coli (E. coli) monitoring limits. The permittee will be given a one-year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits.

The permittee will also be required to begin monitoring for Nitrite and Nitrate, Phosphorus, Total Dissolved Solids (TDS), and Total Kjeldahl Nitrogen (TKN). Monitoring requirements for all new parameters will be described in the new permit.

Please provide to this office, within 14 days' receipt of this notification, written documentation describing the actions that will be taken, or have been taken, to address the above-referenced items. 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

Attachments: Photographs

TP/cs

