



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 4, 2013

RE: TRUMBULL COUNTY  
HUBBARD TWP  
VALLEY MHP  
NPDES PERMIT NO. OH0128953  
OHIO EPA PERMIT NO. 3PV00096

Todd Jones  
Valley MHP  
5925 Youngstown-Hubbard Rd.  
Hubbard, OH 44425

Mr. Jones:

Ohio EPA performed a compliance evaluation inspection of the wastewater 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 National Pollutant Discharge Elimination System (NPDES) permit.

The current 15,000-gpd treatment system consists of a flow equalization basin, extended aeration activated sludge process, final settling tank, slow surface sand filtration, sludge holding, and chlorination/dechlorination. Treated effluent is discharged to an unnamed tributary of Crab Creek.

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

1. The overall operation and maintenance of the treatment works appeared to be marginal. All treatment systems appeared to be operational.
2. The large, northeast gate was not locked.
3. A noticeable green tint was observed in the flow equalization tank and aeration tanks.
4. Floating sludge was observed in the clarifiers.
5. The sand filter distribution box is quite leaky.
6. The sand filters were full of heavy solids buildup and dense vegetation. The vegetation and accumulated solids need to be completely removed, and the sand raked and leveled. Improved performance of the clarifiers will help reduce the solids loading on the sand filters.
7. The sand filter walls are quite leaky. Partially treated effluent was observed leaking through the exterior walls of the active sand filter, and pooling on the ground. Partially treated effluent was also observed leaking through the interior walls of the active filter

bed, and flowing into the inactive beds. Please note that Part III of the NPDES permit contains specific language that: 1) requires that the treatment works be regularly maintained, and 2) prohibits treatment works bypasses.

8. Splash pads and stone riprap must be installed in the sand filters.
9. Please provide copies of the entries from the bound and numbered O & M logbook for all of 2011 and 2012.
1. Part II, J of the facility's NPDES permit requires that an outfall sign be erected at the outfall point by no later than four months from the effective date of the permit, which was June 1, 2011. No such sign was observed during the inspection. Please refer to the above-referenced part of the NPDES permit for specific instructions regarding the sizing, positioning, and what information must be displayed on the sign.
10. The final effluent appeared to be clear, and was not causing any immediately-noticeable, adverse impacts to the receiving stream.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period March 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
3PV00096*BD	May 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.085	.08955	5/1/2011
3PV00096*DD	May 2012	001	00300	Dissolved Oxygen	1D Conc	5.0	4.6	5/8/2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
3PV00096*DD	July 2011	001	01350	Turbidity, Severity	1/Day	1	0	7/27/2011
3PV00096*DD	July 2011	001	01350	Turbidity, Severity	1/Day	1	0	7/28/2011
3PV00096*DD	July 2011	001	01350	Turbidity, Severity	1/Day	1	0	7/29/2011
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/14/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/17/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/19/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/20/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/21/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/24/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/26/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/27/2012
3PV00096*DD	September 2012	001	01350	Turbidity, Severity	1/Day	1	0	9/28/2012

The eDMR review also indicated usage of the AH substitution code for missed quarterly sample events. Please note Part III.1 of the NPDES permit requires that samples for quarterly parameters be taken in March, June, August, and December. Failure to collect and analyze samples as required by the NPDES permit is an NPDES permit violation.

In addition to the above, our review of the facility's data reporting procedures also noted that Mr. Edward Mosko of Valley Environmental Laboratories, Inc. has been submitting the facility's eDMR data. Pursuant to Part III, Item 28 of the NPDES permit, "all reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22". 40 CFR 122.22 explains that reports or any other information requested by the Director must be signed and certified by an individual having authority to sign permit applications as described in 40 CFR 122.22 (a), or by a duly authorized representative. As explained in this section:

*A person is a duly authorized representative if:*

*(1) The authorization is made in writing by a person described in paragraph (a) of this section;*

*(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,*

*(3) The written authorization is submitted to the Director.*

This office has no documentation on file indicating that Valley Environmental Laboratories, Inc. has been designated as the facility's operator of record. As such, and based on the requirements outlined in 40 CFR 122.22, Mr. Mosko may not submit eDMR data on behalf of Valley MHP.

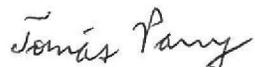
You were also required to submit to this office, within six months of the effective date of the NPDES permit, a report evaluating the ability of the existing treatment works to meet the Escherichia coli (E. coli) monitoring limits that would become effective 12 months after the effective date of the NPDES permit. To date, this office has not received the required E. coli status report. Failure to submit any reports or other documentation as required in an NPDES permit compliance schedule is an NPDES permit violation. Please refer to Part I, C of the NPDES permit for additional language regarding E. coli monitoring requirements.

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. 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.

VALLEY MHP  
MARCH 4, 2013  
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Should you have any questions or comments regarding this letter, please contact this office at (330)963-1120.

Respectfully,

A handwritten signature in cursive script that reads "Tomás Parry".

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

Attachments: Photos

TP/cs

cc: Valley Environmental Laboratories, Inc.

