



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 11, 2013

RE: TRUMBULL COUNTY
WEATHERSFIELD TWP.
LB FOSTER CO.
NPDES PERMIT NO. OH0140724
OHIO EPA PERMIT NO. 3IS00125

Mr. John Kasel
LB Foster Co.
1195 Salt Springs Rd.
Mineral Ridge, Ohio 44440

Mr. Kasel:

Ohio EPA and the Trumbull County Board of Health performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on February 27, 2013. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's compliance with the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

The existing 1,000-gpd treatment system consists of an influent bar screen, 1,000-gallon aerated flow equalization basin, 1,500-gallon activated sludge treatment process, 500-gallon dose tank, dual-unit slow surface sand filters, and a chlorination/dechlorination disinfection chamber. Waste-activated sludge is stored in an aerated sludge holding tank before being hauled away for final disposal. Treated effluent is discharged to an unnamed tributary of Meander 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 satisfactory. All treatment units appeared to be in working condition.
2. The mixed liquor was quite dark, and watery – indicative of a low organic load coming into the plant.
3. Foaming was observed in the aeration tank.
4. Please ensure that both initials (first and last name) of the plant's operation and maintenance personnel are included in the entries in the logbook.
5. The splash pad in the east sand filter has settled, and needs to be leveled. Additionally, please install stone riprap around both sand filter splash pads.
6. The sand filters need to be weeded, and raked level.

7. The lettering on the outfall sign does not meet the minimum 2-inch size requirement specified in Part II, K of the NPDES permit. Outfall signs must be installed in accordance with the referenced section of the NPDES permit.
8. 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 electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period December 2008 – 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
3IS00125*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.47	3/1/2009
3IS00125*AD	December 2011	001	00400	pH	1D Conc	9.0	9.1	12/1/2011

The eDMR review also indicated a wide range of flow values being reported. Flow values as low as 4 gpd have been reported as well as long intervals with 100 gpd or 1,000 gpd being reported. Please note that the NPDES permit requires that flow be estimated on a daily basis. Simply reporting the facility's design flow on a daily basis does **not** meet this requirement. Please provide to this office, documentation describing how the flow values are determined for the facility.

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 routinely 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 LB

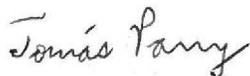
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Foster Co. To designate an operator of record, please complete and submit to Ohio EPA, the enclosed Operator of Record Notification (ORC) form.

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 items identified in this letter. 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/cs

Attachments: ORC form
Photos

cc: Francis Gajski, LB Foster Co.
Steve Kramer, R.S., Trumbull County Board of Health
Valley Environmental Labs, Inc.

