



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

April 11, 2013

RE: TRUMBULL COUNTY  
 BAZETTA TOWNSHIP  
 BAZETTA WWTP  
 1440 STERLING DRIVE  
 NPDES PERMIT NO. OH0092550  
 OHIO EPA PERMIT NO. 3PG00140

Mr. Rex Fee, Executive Director  
 Trumbull County Sanitary Engineers  
 7500 Anderson Avenue, N.E.  
 Warren, Ohio 44484

Mr. Fee:

Ohio EPA performed a compliance evaluation inspection of the above-referenced wastewater treatment works on March 27, 2013. The inspection was conducted 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.

The existing treatment system consists of a bar screen, flow equalization basin, 84,000-gpd extended aeration activated sludge treatment process, final settling tank, slow surface sand filtration, and UV disinfection. Waste activated sludge is stored in an aerated sludge holding tank until it is hauled away for final disposal. Treated effluent is discharged to Mosquito Creek Reservoir.

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 color of the mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
3. The final effluent appeared to be clear, and was not causing any immediately-observable, adverse impacts to the receiving reservoir.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) from August 2011 – March 2013 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PG00140*FD	October 2011	001	31616	Fecal Coliform	30D Conc	200	1407.12	10/1/2011
3PG00140*FD	October 2011	001	31616	Fecal Coliform	7D Conc	400	5500.	10/22/2011
3PG00140*FD	December 2011	001	00530	Total Suspended Solids	7D Conc	18	33.	12/8/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PG00140*FD	April 2012	001	50050	Flow Rate			AD	4/18/2012

The eDMR review also indicated that a number of missed sampling events were reported as "AH", or Sample Not Taken. The explanations for the AH code were that the laboratory chemist was on vacation. Please note that failure to collect and analyze samples as required in the NPDES permit is a violation. Effluent samples must be collected and analyzed in accordance with the NPDES requirements.

In addition to the inspection findings and the eDMR review, your office was also required to submit to Ohio EPA, 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 became effective twelve months after the effective date of the NPDES permit, which was May 1, 2012. To date, this office has not received the required E. coli status report. While the eDMR review indicated there have been no issues with meeting the E. coli limits, the report is still necessary.

This office is also aware of the multiple treatment bypasses that have been occurring at the facility due to power outages and backup generator failures. Since a headworks bypass station is not identified in the NPDES permit, this office questioned how the bypasses were occurring. It was later determined that when the treatment plant was last expanded, part of the work was to include sealing off a connection from the flow equalization basin to a final diversion manhole. This connection had never been sealed off, and so during power outages the flow equalization basin was overflowing into the diversion manhole and out through Outfall 001.

Your office has since indicated that the connection would be sealed off as was originally required, and that the backup generator would be maintained and inspected regularly to ensure it is available during power outages to keep the plant running. Additionally, 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. Treatment works bypasses are therefore considered to be an NPDES violation.

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. Additionally, past or current acts of noncompliance can continue as subjects of future enforcement actions. Such enforcement actions can result in fines of up to \$10,000 per day of violation.

Please submit to Ohio EPA, within 14 days' receipt of this notification, written documentation describing the course of action that will be taken, or has been taken, to address the deficiencies identified in this letter. Your response shall include specific dates for the initiation and completion of this action plan.

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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

TP/cs