



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

April 11, 2013

RE: TRUMBULL COUNTY  
LIBERTY TOWNSHIP  
LOGAN ARMS WWTP  
4757 LOGAN WAY  
NPDES PERMIT NO. OH0092568  
OHIO EPA PERMIT NO. 3PG00141

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 comminutor, 50,000-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 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 satisfactory. All treatment units appeared to be in working condition.
2. There are holes in the wall separating the sludge holding tank and the aeration tank.
3. The color of the mixed liquor was a chocolate brown color, indicative of a healthy bacterial population.
4. Floating sludge was observed in the clarifier.
5. Rusty tank gratings were observed. These should be replaced.
6. Both sand filter dose pumps were out of service. Replacement pumps had been ordered, and portable submersible pumps were being used in the interim. Since the inspection, this office has received notice that the new dose pumps arrived and have been installed.
7. The sand filter walls are deteriorating in places, and need to be repaired/rehabilitated.

8. Sludge deposits were observed on the sand filters.
9. The final effluent appeared clear, and was not causing any immediately-observable, adverse impacts to the receiving stream.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) from June 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
3PG00141*FD	May 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.345	5/1/2012
3PG00141*FD	May 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	4.455	5/15/2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PG00141*FD	March 2012	001	50050	Flow Rate			AD	3/10/2012
3PG00141*FD	March 2012	001	50050	Flow Rate			AD	3/11/2012
3PG00141*FD	March 2012	001	50050	Flow Rate			AD	3/12/2012
3PG00141*FD	March 2012	001	50050	Flow Rate			AD	3/20/2012

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.

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.

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