



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

April 11, 2013

RE: TRUMBULL COUNTY  
LIBERTY TOWNSHIP  
FOX DEN WWTP  
7000 LAKEVIEW DRIVE  
NPDES PERMIT NO. OH0112216  
OHIO EPA PERMIT NO. 3PG00148

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 trash trap, flow equalization basin, 28,000-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 an unnamed tributary of Crab Creek.

During the inspection, the following observation 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. Sludge deposits were observed in the sand filters.
4. 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) 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
3PG00148 *CD	November 2011	001	50050	Flow Rate			AD	11/30/2011
3PG00148 *CD	December 2011	001	50050	Flow Rate			AD	12/1/2011
3PG00148 *CD	December 2011	001	50050	Flow Rate			AD	12/2/2011

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 February 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.

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:bo