



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

August 19, 2013

RE: TRUMBULL COUNTY
VIENNA TWP
THE 972 COMPANY LTD.
NPDES PERMIT NO. OH0133434
OHIO EPA PERMIT NO. 3PR00350

Mr. Robert Thompson Jr., President
The 972 Company Ltd.
972 Youngstown Kingsville Road
Vienna, Ohio 44473

Mr. Thompson:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on July 29, 2013. The inspection was performed to evaluate the operation and maintenance of the facility's treatment system, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The existing treatment system consists of a trash trap, 1,500-gpd extended aeration activated sludge treatment process, final settling tank, dual-unit slow surface sand filters, and chlorination/dechlorination contact tank. Treated effluent is discharged to an unnamed tributary of Squaw Creek.

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

1. The overall operation and maintenance of the treatment system appeared to be marginal. While all treatment units appeared to be in working condition, there are a number of routine O & M items that must be addressed until the treatment works is abandoned, and a connection to the newly-constructed public sanitary sewer is finalized.
2. The last entry in the O & M logbook appeared to be from May 7, 2012. Please note that your contract operator must be at the plant twice a week for a minimum of one hour total. Additionally, operators must sign in with their time in/out, the date, a brief description of the work performed, and their initials.
3. The mixed liquor in the aeration tank was a light brown color.
4. Both sand filters had vegetation growing in them that needs to be pulled. The sand should also be raked and leveled to ensure even distribution and percolation of wastewater.
5. The settling tank had a very thick layer of floating sludge and vegetation in it. Additionally, the skimmer was not visible.

6. While fresh chlorine tablets were observed in the chlorine feed tube, they had not dropped all the way down to the bottom of the feed tube. As such, the effluent was passing underneath the tablets without achieving a sufficient contact time. The tablets must be all the way in the flow of the effluent to achieve a proper contact time and bacteria kill.
7. The dechlorination tablets were quite deteriorated, and must be replaced.
8. The final effluent being discharged appeared to be relatively clear.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period May 2012 – July 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
3PR00350*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	13.9	6/1/2012
3PR00350*AD	June 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	13.9	6/1/2012
3PR00350*AD	August 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.18	8/1/2012
3PR00350*AD	August 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.18	8/8/2012
3PR00350*BD	December 2012	001	00530	Total Suspended Solids	30D Conc	12	26.	12/1/2012
3PR00350*BD	December 2012	001	00530	Total Suspended Solids	7D Conc	18	26.	12/15/2012
3PR00350*BD	December 2012	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	6.86	12/1/2012
3PR00350*BD	December 2012	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	6.75	6.86	12/15/2012
3PR00350*BD	March 2013	001	00530	Total Suspended Solids	30D Conc	12	48.	3/1/2013
3PR00350*BD	March 2013	001	00530	Total Suspended Solids	7D Conc	18	48.	3/8/2013
3PR00350*BD	March 2013	001	00530	Total Suspended Solids	30D Qty	0.068	.0714	3/1/2013
3PR00350*BD	March 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	4.5	22.8	3/1/2013
3PR00350*BD	March 2013	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	6.75	22.8	3/8/2013
3PR00350*BD	March 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.026	.03392	3/1/2013
3PR00350*BD	June 2013	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	2.0	5.29	6/1/2013
3PR00350*BD	June 2013	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.0	5.29	6/15/2013

Due to the repeated and excessive Ammonia violations, the 972 Company Ltd. is considered to be in **significant noncompliance** with the terms and conditions of the NPDES permit. Recent discussions with the Trumbull County Sanitary Engineers and the Trumbull County Board of Health have indicated that sanitary sewers have now been deemed available and accessible to the property (letter addressed to you April 19, 2013 from the Trumbull County Board of Health). To avoid this office initiating enforcement action for the NPDES permit violations, please see to it that the wastewater treatment plant is abandoned, and the facility's wastewater stream is directed to the public sanitary sewer.

Please note that Part II, J of the NPDES permit contains language requiring a sanitary sewer connection once such sewers become available. As such, failure to do so will also result in this office initiating an enforcement action against the facility.

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to address the items described 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) 360-1120.

Respectfully,

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

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

TP/cs

cc: Richard Curl, R.S., Trumbull County Board of Health
Scott Mascioli

ec: Erm Gomes, Ohio EPA, NEDO, DSW

