



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

September 27, 2013

RE: TRUMBULL COUNTY
BAZETTA TOWNSHIP
HOWLAND ALARM CO., INC.
NPDES PERMIT NO. OHS000003
OHIO EPA PERMIT NO. 3GS00154

Ms. Cindy Matheson, Partner
Howland Alarm Co., Inc.
2489 Niles-Cortland Rd.
Cortland, Ohio 44410

Ms. Matheson:

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 August 29, 2013. Mr. Richard Curl represented the Trumbull County Board of Health and the undersigned represented Ohio EPA. 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 treatment components for the 360-gpd treatment system consist of a 500-gallon trash trap/flow equalization tank, 500-gallon aeration tank with integral settling chamber, 48-square foot dual-unit slow surface sand filter, and post-aeration/UV disinfection chamber. Treated effluent is discharged to an unnamed tributary of Big Run.

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 operation.
2. The mixed liquor was quite watery and light brown in color. This may be indicative of a low organic load coming into the plant.
3. Please ensure that the plant operator and any other O & M personnel record their arrival and departure time in the logbook.
4. Please install stone riprap around the sand filter splash pads to help dissipate the energy of the wastewater doses and prevent the development of preferential flow paths.
5. Please provide documentation that a spare equalization tank pump and a spare sand filter dose pump are being maintained on site.
6. The final effluent, while it appeared to be slightly turbid, did not appear to be causing any immediately noticeable, adverse impacts to the receiving stream.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period August 2012 – September 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
3GS00154*AG	September 2012	005	00300	Dissolved Oxygen	1D Conc	6.0	5.81	9/20/2012
3GS00154*AG	September 2012	005	00530	Total Suspended Solids	30D Conc	12	16.7	9/1/2012
3GS00154*AG	September 2012	005	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	11.2	9/1/2012
3GS00154*AG	September 2012	005	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	11.2	9/22/2012
3GS00154*AG	September 2012	005	31616	Fecal Coliform	30D Conc	1000	1200.	9/1/2012

The eDMR review also indicated that since the NPDES permit became effective on August 1, 2012, a large majority of the facility's daily flow values have been reported as 75 gallons per day. Please provide an explanation as to how daily flow values are estimated.

As was required in the last letter from this office, please provide detailed documentation describing what type of wastewater treatment is being provided at the call center building. Specifically, pumping receipts, correspondence from a local sewer authority, billing invoices, and any other applicable documentation would be acceptable.

Please inform this office, in writing, within 14 days' receipt of this notification, of the actions taken or proposed to address all of the above-referenced violations and/or deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. 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. Such actions can result in fines of up to \$10,000 per day of violation.

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 II
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Steve Kramer, R.S., Trumbull County Board of Health
Paul Panic

