Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 19, 2011

RE: TRUMBULL COUNTY
CITY OF HUBBARD WWTP
NPDES PERMIT NO. OH0025810
OHIO EPA PERMIT NO. 3PD00028

Mayor and Council
City of Hubbard
220 West Liberty Street.
Hubbard, Ohio 44425

Dear Mayor and Council:

Ohio EPA conducted a compliance evaluation inspection at the above-referenced facility on December 5, 2011. Mr. Mark Ackworth, Mr. Paul Bolchalk, and Mr. Randy Fabrizio represented the City of Hubbard and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operational performance of the treatment system and determine the facility's overall compliance with its newly reissued National Pollutant Discharge Elimination System (NPDES) permit.

The current treatment system treats an average daily flow of 2.1 MGD, and consists of mechanical bar screening, aerated grit removal, activated sludge treatment process, secondary clarification, chlorine disinfection, dechlorination, and post aeration. Treated effluent is discharged to Little Yankee Creek. Waste activated sludge is processed through an aerobic storage tank and dewatered in a belt filter press before being hauled away for disposal.

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

1. The overall operation and maintenance of the treatment works was satisfactory. The final effluent at Outfall 001 was clear, and was not causing an immediately noticeable, adverse impact to the receiving stream.

2. The clock on the influent flow meter has not been adjusted for the fall time change. Please see to it that the clock is turned back one hour.

3. Please provide verification for when the thermometers in the samplers were last calibrated.

4. Light foaming was observed in the disinfection chamber.

5. Laboratory log books need the initials of the person making each entry. Additionally, all laboratory work should be documented in bound and numbered log books.

6. The weights used to calibrate the balance were overdue for certification. The weights should be certified yearly. Please maintain the certification records on site.

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7. The clarifier level monitor was last calibrated on June 7, 2010. These units should be calibrated on a yearly basis. Please maintain the calibration records on site.

8. Algal growth and suspended particulates were observed in the secondary clarifiers.

9. Part II, P of the City's NPDES permit requires that outfall signs be erected at all outfalls no later than four months after the effective date of the permit, which was March 1, 2011. During the inspections, signs were not observed.

10. The City of Hubbard has recently hired a new superintendent, Mr. Randy Fabrizio. While the appropriate paperwork was filed to indicate this change, this office noted that Mr. Fabrizio is the only certified operator on staff at the facility. Part II, B of the NPDES permit requires that the plant be staffed in accordance with the requirements of the Ohio EPA-approved Operation and Maintenance manual.

11. The City of Hubbard has not experienced any difficulty in meeting the new E. coli limits with its current disinfection technology.

A review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, October 2010 – November 2011, indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	001	00530	Total Suspended Solids	7D Qty	239	266.190	12/1/2010
December 2010	001	01094	Zinc, Total Recoverabl	1D Conc	208	365.	12/1/2010
December 2010	001	01094	Zinc, Total Recoverabl	1D Qty	1.65	4.64469	12/1/2010
December 2010	001	01119	Copper, Total Recovera	1D Conc	26	258.	12/1/2010
December 2010	001	01119	Copper, Total Recovera	30D Conc	17	258.	12/1/2010
December 2010	001	01119	Copper, Total Recovera	1D Qty	0.21	3.28309	12/1/2010
December 2010	001	01119	Copper, Total Recovera	30D Qty	0.14	3.28309	12/1/2010
February 2011	001	01119	Copper, Total Recovera	30D Qty	0.14	.14439	2/1/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00028*JD	September 2011	001	50050	Flow Rate			AD	9/1/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/25/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/24/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/23/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/22/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/21/2011

3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/20/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/19/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/18/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/17/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/16/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/15/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/14/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/13/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/12/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/11/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/10/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/9/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/8/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/7/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/6/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/5/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/4/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/3/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/2/2011
3PD00028*JD	October 2011	001	50050	Flow Rate			AD	10/1/2011

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2011	001	50050	Flow Rate	1/Day	1	0	09/04/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/06/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/07/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/13/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/14/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/19/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/26/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/18/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/30/2011

September 2011	001	50050	Flow Rate	1/Day	1	0	09/15/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/17/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/22/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/23/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/25/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/03/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/10/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/27/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/20/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/02/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/05/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/08/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/11/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/21/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/24/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/28/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/16/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/09/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/12/2011
September 2011	001	50050	Flow Rate	1/Day	1	0	09/29/2011

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that will be taken, or have been taken, to address the above-referenced deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that violations of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code.

Should you have any questions or comments regarding the inspection, please contact this office at (330) 963-1120.

Respectfully,

Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

cc: Randy Fabrizio, Hubbard WWTP

Attachments: Photographs