



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



11Y0002020080221

GREENE CENTRAL STATE UNIVERSITY WTP

ZIMMERMAN, MICH 2008/02/21



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6367 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 21, 2008

Mr. Eric L. Jones, Water Services Manager
Central State University
P.O. Box 1004
Wilberforce, Ohio 45384

**Re: Central State University Water Treatment Plant
NPDES Permit No. IY00020*DD; OH0007951
NPDES Compliance Inspection and Notice of Violation**

Dear Mr. Jones:

On February 14, 2008 I conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection at the above referenced facility. Robert Oatneal, water treatment plant operator, represented the University during the inspection. The purpose of the inspection was to evaluate the operation and performance of the water plant's wastewater treatment system and to determine compliance with the NPDES permit.

Several compliance areas evaluated during the inspection were rated as unsatisfactory (refer to Section C of the report). The two slow sand "red water" filters were not being properly operated and maintained. During the inspection, backwash wastewater was observed bypassing the filters, overflowing the top of the walls and discharging onto the ground. Mr. Oatneal stated the slow sand filters were clogged, with backwash wastewater draining through the filters very slowly, resulting in the bypass. He stated the filter sand and one of the backwash pumps were scheduled for replacement in 2008.

Review of the Discharge Monitoring Reports for the period January, 2005 through December, 2007 revealed a significant number of final effluent limit violations for suspended iron (refer to the attached Table 1). These violations and the failure to report the violations and the bypassing, as required by the conditions in Part III, Nos. 11 and 12, of the NPDES permit, resulted in unsatisfactory ratings for "Effluent/Receiving Waters" and "Self-Monitoring Program".

Page 2

As you are aware, failure to comply with the effluent limits, or to satisfy monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Please provide this office a written response, by March 21, 2008 addressing the following: 1) steps you intend to take to reduce and/or eliminate the effluent limit violations; and 2) a schedule for maintenance of the slow sand filters (i.e. sand replacement).

A copy of the inspection report is attached. If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,



Michael W. Zimmerman
Permits Group
Division of Surface Water

copy: John W. Garland, President, Central State University
Robert Oatneal, Central State University
Dan Cloyd, Ohio EPA, Division of Drinking and Ground Water

Enclosure



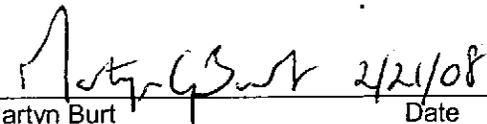
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11Y00020*DD	OH0007951	2/14/2008	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Central State University Water Treatment Plant 1400 Brush Row Road Wilberforce, Ohio 45384 Mailing: PO Box 1004 Wilberforce, OH 45384	12:00 pm	9/1/2006
	Exit Time	Permit Expiration Date
	12:35 pm	8/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Robert Oatneal, Operator	(937) 376-6452 (plant)	
Name, Address and Title of Responsible Official	Phone Number	
Eric Jones, Water Services Manager (same address)	(937) 376-6199 (office)	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	N	Compliance Schedule
U	Operations & Maintenance	U	Effluent/Receiving Waters	U	Self-Monitoring Program
U	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Several areas evaluated during the inspection received unsatisfactory ratings. It was evident the wastewater treatment system (slow sand "red water" filters) was not being properly operated and maintained. Filter backwash wastewater was bypassing the two slow sand filters, overflowing the top of the walls and discharging onto the ground. Mr. Oatneal stated the slow sand filters were clogged, with water filtering through the sand very slowly. He said the sand in the filters was scheduled to be replaced in the spring (2008).</p> <p>Review of the Discharge Monitoring Reports for the period 2005 through 2007 revealed several final effluent limit violations for suspended iron (refer to the attached Table 1). These violations and the failure to report the violations and the bypassing, as required by the conditions in Part III, Nos. 11 and 12, of the NPDES permit, resulted in unsatisfactory ratings for "Effluent/Receiving Waters" and "Self-Monitoring Program".</p>	
Inspector	Reviewer
 Michael W. Zimmerman Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 2/21/08	Date 2/21/08

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	Moderate	None	None	Rusty	-

Comments/Status:

During the inspection on Feb. 14, 2008, the filter backwash wastewater was bypassing (overflowing) the wastewater treatment system - slow sand ("red water") filters. The wastewater then flowed across the ground and into the permitted receiving stream. Treated wastewater was also flowing from the final effluent pipe.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Permit # : 11Y00020*DD
 NPDES # : OH0007951

Table 1. Final Effluent Limit Violations

(Period of Review: January 2005 – December, 2007)

7D = Weekly 30D = Monthly 1D = Daily
 Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
August 2006	Iron, Suspended (Fe)	30D Conc	1000	1030.
September 2006	Iron, Suspended (Fe)	30D Conc	1000	1654.
September 2006	Iron, Suspended (Fe)	1D Conc	2000	3120.
October 2006	Iron, Suspended (Fe)	30D Conc	1000	1473.5
October 2006	Iron, Suspended (Fe)	1D Conc	2000	2470.
November 2006	Iron, Suspended (Fe)	30D Conc	1000	2005.
November 2006	Iron, Suspended (Fe)	1D Conc	2000	2260.
December 2006	Iron, Suspended (Fe)	30D Conc	1000	1215.
December 2006	Iron, Suspended (Fe)	1D Conc	2000	2260.
April 2007	Iron, Suspended (Fe)	30D Conc	1000	1525.
June 2007	Iron, Suspended (Fe)	30D Conc	1000	1500.
July 2007	Iron, Suspended (Fe)	30D Conc	1000	1725.
August 2007	Iron, Suspended (Fe)	30D Conc	1000	1755.
August 2007	Iron, Suspended (Fe)	1D Conc	2000	2070.
November 2007	Iron, Suspended (Fe)	30D Conc	1000	1587.5
November 2007	Iron, Suspended (Fe)	1D Conc	2000	2210.



2.1.1