



State of Ohio Environmental Protection Agency

**Southwest District Office**

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

July 24, 2007

Mr. James Beasley  
Director, ODOT  
1980 West Broad Street  
Columbus, Ohio 43223

**RE: ODOT Rest Area 0729 Notice of Violation and Waste Water Treatment Plant  
Reconnaissance Inspection.**

Dear Mr. Beasley:

On June 14, 2007, I conducted a Reconnaissance Inspection at the ODOT Rest Area 0729, Logan County, waste water treatment plant. The inspection was conducted as part of the National Pollutant Discharge Elimination System permit renewal process for the facility.

The inspection findings are attached. The report includes two items that require a response. Please provide a written response to these items by the dates noted.

If you have any questions regarding the report, I can be contact at (937) 285-6097.

Sincerely,

Joseph Reynolds  
Division of Surface Water

Enclosure

cc: Neil Rohrbach, ODOT



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Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PP00021	OH0096334	6/14/2007	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
ODOT District 7 Rest Area 0729 U.S. Route 33 (East bound lane)	10:00 AM	6/1/2002
	Exit Time	Permit Expiration Date
	11:10 AM	5/31/2007
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Neil Rohrbach, Plant Operator Rocky Forney, maintenance	(937) 538 - 6284	
Name, Address and Title of Responsible Official	Phone Number	
James G. Beasley, Director 1980 West Broad Street Columbus, Ohio 43223		

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	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
M	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

**Section D: Summary of Findings (Attach additional sheets if necessary)**  
See Attached Report.

Inspector	Reviewer
 Joe Reynolds Division of Surface Water Southwest District Office Date 7/24/07	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date



## Inspection Findings

The Ohio Department of Transportation operates a package waste water treatment system which serves the U.S. Route 33 rest area (Rest Area 0729), Logan County. The system is designed to treat 10,000 gpd of sanitary waste water.

National Pollutant Discharge Elimination System (NPDES) permit number 1PP00021 was issued to ODOT on April 22, 2002. This permit expired on May 31, 2007. An NPDES permit renewal application was submitted to the Ohio EPA on October 16, 2006.

Permit 1PP00021 contained a compliance schedule for installation of a dechlorination system designed to meet a new chlorine residual limit of 0.019 mg/l. The schedule required completion by no later than May 1, 2004. This work was never performed.

Mr. Rohrbach reports that bacteria limits are being met through the introduction of chlorine from the distribution system. The residual chlorine reportedly is being used up in the treatment system.

Mr. Rohrbach also indicated that ODOT intends to tie the treatment system into the Indian Lake sanitary sewer system some time in 2009.

The treatment system consists of a trash trap, main lift station, flow equalization, aeration tank, clarification, fixed media clarifiers, sand filter dosing chamber, (2) slow surface sand filters, chlorine contact tank, and aerated sludge holding.

If the final effluent fecal levels start to rise, chlorine can be added to the sand filter dosing chamber. In order to insure that residual chlorine limits are met, a dechlorination chemical can be added to the chlorine contact tank dosing chamber.

Mike's Sanitation pumps waste solids from the sludge holding tank for disposal at his permitted facility. Screenings go to the solid waste landfill.

Waste water from the East and West bound rest areas flows by gravity to the main plant lift station. The lift station has two pumps that pump flow to the equalization tank. The station has both an audible and visual alarm.

The equalization tank was being aerated. Rolling mixing was occurring. Air lifts send waste water to a splitter box where a percentage of the flow is sent to aeration, and a percentage is returned to equalization.



## Inspection Findings (cont.)

The aeration tank was being mixed uniformly. Two blowers (blowers run on timers) are used to provide air. The mixed liquor appeared thin.

The final clarifier was slightly turbid. There was no visible sludge blanket. The effluent was clear.

The intermediate clarifiers were cleaned the previous day. There were minimal solids in the tank. The water level in the tank had not reached the level of the effluent weir.

The tertiary filter dosing chamber has two pumps that automatically alternate. The pumps are float activated. There are audio and visual alarms on the station.

Flow is diverted between the two tertiary sand filters by a valve. Both filters were dry. New sand was recently added to the North filter. Residual solids from the filters were noted on the ground.

The chlorine contact tank did not have chlorine tablets in it. A slight film (possibly oil) was noted on the surface.

The system discharges to a field tile prior to Flat Branch.

On December 21, 2006 new operator rules (Ohio Administrative Code 3745 – 7, Operator Certification for Public Water Systems and Waste Water Treatment Works) went into effect for all waste water treatment systems in the state of Ohio. These rules define plant classification and minimum staffing levels associated with the designated classification. In accordance with the new rules the ODOT Rest area 0729 waste water treatment system will be classified as a Class A waste water treatment plant. Beginning on December 21, 2008 ODOT must meet the minimum staffing level ( Class A operator on-site, 2 days per week for a minimum of 1.0 hours per week) in the new rule. In addition to the minimum staffing OAC 3745 – 7 – 09 establishes minimum record keeping requirements (see attached). These records are required to be maintained on site beginning December 21, 2006.

Between January 2006 and May 2007 ODOT reported the following final effluent numeric limits violations: Fecal Coliform 4 violations, Chlorine Residual 4 violations, Ammonia 1 violation, and Dissolved Oxygen 2 violations.



## Items Requiring a Response

1. ODOT has failed to comply with the permit schedule for meeting the Chlorine residual of 0.019 mg/l. An updated schedule which includes dates for submittal of a Permit to Install application(a PTI is required prior to the installation of waste water treatment systems), initiate construction, complete construction, and meet final effluent limits must be submitted to this office by no later than September 17, 2007.
2. The residual solids located beside the tertiary sand filters must be collected and disposed of at an approved disposal facility (i.e. solid waste landfill). Written notification as to the completion of this work must be provided by no later than August 17, 2007.

