



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Erie County
Berlin-Milan Schools
NPDES Permit

August 13, 2008

Mr. David Snook, Superintendent
Berlin-Milan Local Schools
140 South Main Street
Milan, Ohio 44846

Dear Mr. Snook:

On July 1, 2008 an inspection was made of the sewerage facilities serving the Berlin-Milan Middle School in conjunction with the renewal of the NPDES permit which expired July 31, 2008. The Edison High School was also visited. Mr. Don Opfer, Safety Director escorted me and provided information regarding operation of the facilities. My comments and recommendations are as follows:

Middle School – I was very disappointed at the current and past performance of this plant. At the time of my visit air supply problems were resulting in inadequate aeration being provided to the plant and it was nearly septic. The surface sandfilters were very heavily weeded and need attention. A review of your NPDES monthly discharge monitoring reports since 2006 indicate chronic violations of permit limitations. A copy is enclosed for your review. It's obvious that this facility is not receiving the necessary operation and maintenance oversight, and has been allowed to deteriorate since the plant was installed in 2002. I spoke to Steve Howe, AKE Labs, your technical supervisor, who stated that they are only authorized for monthly visits to collect samples and limited authorization to make improvements. Once per month is inadequate and maintenance visits must be increased as necessary. Wastewater Operator certification requirements have recently been updated and now require minimum on-site hours be documented depending on the size of the facility.

I recommended to Mr. Opfer that the plant manufacturer be contacted to make a thorough inspection of all components and make necessary improvements in order to bring the plant back into compliance. A schedule of compliance will be included in the NPDES permit renewal requiring all necessary improvements be made to meet final table effluent limits. If the chronic noncompliance continues you will be subject to formal enforcement action from this agency. Please notify me in writing within 14 days of your plans to implement improvements to bring the plant back into compliance.

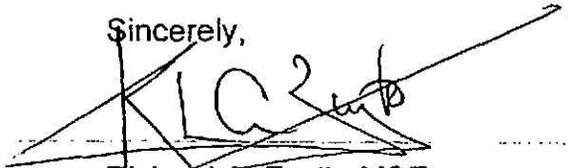
You will be receiving a "draft" copy of the renewal in the near future for your review. Please review it carefully, as you will have a 30-day period in which to comment. Once issued final, it will remain effective for another five year period.

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Edison High School -- At the time of my visit both operation and maintenance appeared fair and a clear final effluent was observed being discharged from the plant. A review of your NPDES monthly discharge monitoring reports since January 2007, the effective date of the current permit, indicate continued chronic ammonia violations. A copy is enclosed for your review, as well as a copy of the NPDES schedule of compliance requiring improvements in the form of flow equalization and sludge holding equipment by December 1, 2010. A permit to install is required by December 1, 2009.

Enclosed are my completed inspection reports. I will await your response. If you have any questions, or feel a meeting is necessary to discuss these issues, please feel free to call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us.

Sincerely,



Richard A. Zuzik, MSE
Division of Surface Water

/csi

pc: Erie County Health Department
AKE Labs
DSW, NWDO file