



Environmental  
Protection Agency

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

Re: Huron County  
Western Reserve Local Schools  
**Notice of Violation (NOV)**

March 1, 2011

Mr. Rodge Wilson, Superintendent  
Western Reserve Local School District  
3765 U.S. Route 20 East  
Collins, Ohio 44826

Dear Mr. Wilson:

On February 10, 2011, Mr. Andrew Gall conducted an inspection of the wastewater treatment plant serving the Western Reserve Local Schools. Western Reserve Local Schools is currently operating under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PT00023\*BD. Our observations are as follows:

1. The plant was operating and the contents of the aeration tank were very light brown. The rate of aeration appeared adequate.
2. The water in the clarifier appeared mostly clear with some light floating solids. The sludge returns and surface skimmers were operating.
3. The west sand filter was off line and the east sand filter was online but was ponded and frozen. Also it was noted that the distribution arm had fallen off the splitter box and into the east filter. (see attached photo) The arm should be reinstalled as soon as possible. Please be aware that the sand filter should not be allowed to overflow and steps should be taken to prevent a filter overflow from occurring.
4. A review of the plant operations log sheet indicates that the last plant check was performed by your contract operator on February 4, 2011. Your NPDES permit requires daily visual inspections of the plant to determine the color, odor and turbidity of the plant effluent. Please make sure that a representative from the school conducts this daily inspection and documents the findings on the plant operations log. If school is closed please indicate this on the log sheet. In addition, the operations log sheet still has not been updated to include operator arrival and departure time to comply with the requirements of OAC 3745-7-09. The rule also requires that, at a minimum the previous three months of operation and maintenance records and operator log be available for inspection at all times. Only the February, 2011 log was available onsite for review.

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5. A review of our records indicates that we have not received a copy of the Operator of Record Notification Form from your facility. A copy of the form is enclosed. Please submit a copy of this form to the Northwest District Office and a copy to our Central office within 30 days of receiving this letter.
6. A review of the discharge monitoring reports (DMR) from June 2010-January 2011 shows continued effluent limit violations of the Nitrogen Ammonia (NH<sub>3</sub>), pH and Total Suspended Solids (TSS) parameters of your NPDES permit. A copy of the violations is enclosed. The facility remains in **significant non-compliance** with effluent limits.
7. The school's NPDES permit contained a schedule of compliance which required the school to meet the final effluent limits no later than June 1, 2008. Your contract operator, Eastwood Environmental, has informed our agency that they changed the blower motor pulleys to increase the plant aeration rate and have added sodium bicarbonate to treat the high influent ammonia. To date these changes have not resulted in improved compliance as the plant has violated effluent limits 84 times since June 2008. Eastwood has proposed installing a "weed tray" at your facility to help improve compliance. Please be aware that a Permit to Install (PTI) application and detail plans for the "weed tray" must be submitted to and approved by Ohio EPA prior to installing and operating the "weed tray".

In the past year our agency conducted several inspections of your facility and issued several **Notice of Violation** (NOV) letters to make you aware of our inspection findings and effluent limit violations. Despite these efforts compliance has not improved and your facility remains in **significant non-compliance** with the NPDES permit. The school must take immediate steps to improve the plant operations and recordkeeping so that compliance with NPDES permit requirements and final effluent limits can be achieved and maintained no later than May 1, 2011. Failure to achieve compliance by May 1, 2011, will result in our office drafting Director's Final Findings and Orders (DFFOs) binding you to attain compliance with the NPDES permit within a specified time frame.

We request that you submit a signed and dated written response to this letter indicating how the record keeping non-compliance issues will be addressed and what operation improvements will be made to achieve compliance with NPDES permit limits by the May 1, 2011 deadline. Please submit this response letter within 14 days of receiving this letter.

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If you have any questions regarding the inspection or wish to arrange a meeting at our office, please contact Mr. Gall at (419) 373-3003 or via email at [andrew.gall@epa.state.oh.us](mailto:andrew.gall@epa.state.oh.us)

Sincerely,



Elizabeth A. Wick, P.E.  
District Engineer/Unit Supervisor  
Division of Surface Water

/llr

pc: Eastwood Environmental  
Huron County Health Department  
DSW-NWDO-File-w/enclosure

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If you have any questions regarding the inspection or wish to arrange a meeting at our office, please contact Mr. Gall at (419) 373-3003 or via email at [andrew.gall@epa.state.oh.us](mailto:andrew.gall@epa.state.oh.us)

Sincerely,



Elizabeth A. Wick, P.E.  
District Engineer/Unit Supervisor  
Division of Surface Water

//lr

pc: Eastwood Environmental  
Huron County Health Department  
DSW-NWDO File w/enclosure

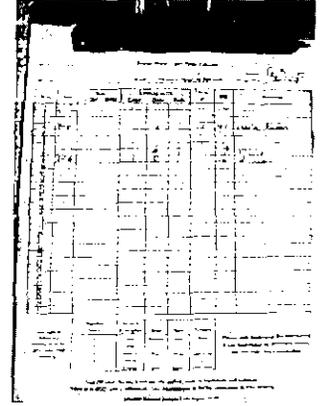
bc: Andy Barienbrock  
Dan Kopec



Western Reserve Local School 02.10.2011  
East Sand Filter  
Photo Taken by Andrew Raf, Ohio EPA NWDO/DSW

Western Reserve Local School 02.10.2011

Photo Taken by Andrew Raf, Ohio EPA NWDO/DSW



Western Reserve Local School 02.10.2011  
East Sand Filter  
Photo Taken by Andrew Raf, Ohio EPA NWDO/DSW

Get New Data

# Limit Violations - Western Reserve Local School

June 2010 - January 2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PT00023*BD	June 2010	001	00400	pH	1D Conc	6.5	6.3	6/1/2010
2PT00023*BD	September 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.735	9/1/2010
2PT00023*BD	September 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	3.47	9/27/2010
2PT00023*BD	September 2010	001	00400	pH	1D Conc	6.5	6.34	9/27/2010
2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.245	10/1/2010
2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.11	.12282	10/1/2010
2PT00023*BD	October 2010	001	00400	pH	1D Conc	6.5	6.07	10/5/2010
2PT00023*BD	October 2010	001	00400	pH	1D Conc	6.5	6.21	10/12/2010
2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	6.2	10/26/2010
2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.16	.23467	10/26/2010
2PT00023*BD	October 2010	001	00400	pH	1D Conc	6.5	5.77	10/26/2010
2PT00023*BD	November 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.74667	11/1/2010
2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.65	11/5/2010
2PT00023*BD	November 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	10.62	11/10/2010
2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.7	11/10/2010
2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.8	11/18/2010
2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.69	11/24/2010
2PT00023*BD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.28	12/1/2010
2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	5.47	12/6/2010
2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	5.84	12/8/2010
2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	5.4	12/15/2010
2PT00023*BD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	4.83	12/22/2010
2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	4.96	12/22/2010
2PT00023*BD	January 2011	001	00530	Total Suspended Solids	30D Conc	12	29.	1/1/2011
2PT00023*BD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.18	1/1/2011
2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	25.	1/5/2011
2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	23.	1/13/2011
2PT00023*BD	January 2011	001	00400	pH	1D Conc	6.5	5.78	1/13/2011
2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	31.	1/21/2011
2PT00023*BD	January 2011	001	00400	pH	1D Conc	6.5	5.37	1/21/2011
2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	37.	1/25/2011
2PT00023*BD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	9.18	1/25/2011
2PT00023*BD	January 2011	001	00400	pH	1D Conc	6.5	5.67	1/25/2011

Limit Violations Since 2008 - Western Reserve Local School

	A	B	C	D	E	F	G	H	
1	Get New Data								
2	Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3	2PT00023*BD	June 2008	001	00400	pH	1D Conc	6.5	5.7	6/5/2008
4	2PT00023*BD	September 2008	001	31616	Fecal Coliform	30D Conc	1000	3100.	9/1/2008
5	2PT00023*BD	September 2008	001	31616	Fecal Coliform	1D Conc	2000	3100.	9/12/2008
6	2PT00023*BD	October 2008	001	00400	pH	1D Conc	6.5	6.2	10/23/2008
7	2PT00023*BD	November 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	8.	11/1/2008
8	2PT00023*BD	November 2008	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	7.1	11/6/2008
9	2PT00023*BD	November 2008	001	00400	pH	1D Conc	6.5	5.7	11/6/2008
10	2PT00023*BD	November 2008	001	00400	pH	1D Conc	6.5	5.6	11/13/2008
11	2PT00023*BD	November 2008	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	8.9	11/20/2008
12	2PT00023*BD	November 2008	001	00400	pH	1D Conc	6.5	6.4	11/20/2008
13	2PT00023*BD	December 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.735	12/1/2008
14	2PT00023*BD	December 2008	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	7.01	12/2/2008
15	2PT00023*BD	January 2009	001	00530	Total Suspended Solids	1D Conc	18	28.	1/7/2009
16	2PT00023*BD	April 2009	001	00400	pH	1D Conc	6.5	6.2	4/14/2009
17	2PT00023*BD	September 2009	001	00400	pH	1D Conc	6.5	6.4	9/11/2009
18	2PT00023*BD	October 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.62	10/1/2009
19	2PT00023*BD	October 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.11	.13702	10/1/2009
20	2PT00023*BD	October 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	6.58	10/6/2009
21	2PT00023*BD	October 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.16	.24905	10/6/2009
22	2PT00023*BD	October 2009	001	00400	pH	1D Conc	6.5	5.5	10/6/2009
23	2PT00023*BD	October 2009	001	00400	pH	1D Conc	6.5	5.7	10/13/2009
24	2PT00023*BD	October 2009	001	00400	pH	1D Conc	6.5	6.	10/20/2009
25	2PT00023*BD	November 2009	001	00400	pH	1D Conc	6.5	6.4	11/10/2009
26	2PT00023*BD	November 2009	001	00400	pH	1D Conc	6.5	6.	11/17/2009
27	2PT00023*BD	November 2009	001	00400	pH	1D Conc	6.5	6.4	11/25/2009
28	2PT00023*BD	December 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.94	12/1/2009
29	2PT00023*BD	December 2009	001	00400	pH	1D Conc	6.5	5.9	12/1/2009
30	2PT00023*BD	December 2009	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	11.14	12/9/2009
31	2PT00023*BD	December 2009	001	00400	pH	1D Conc	6.5	6.4	12/9/2009
32	2PT00023*BD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.05	1/1/2010
33	2PT00023*BD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	6.61	1/5/2010
34	2PT00023*BD	January 2010	001	00400	pH	1D Conc	6.5	6.	1/5/2010
35	2PT00023*BD	January 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	4.67	1/12/2010
36	2PT00023*BD	January 2010	001	00400	pH	1D Conc	6.5	5.8	1/12/2010
37	2PT00023*BD	January 2010	001	00400	pH	1D Conc	6.5	6.3	1/19/2010
38	2PT00023*BD	February 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.18	2/1/2010
39	2PT00023*BD	February 2010	001	00400	pH	1D Conc	6.5	6.2	2/2/2010
40	2PT00023*BD	February 2010	001	00400	pH	1D Conc	6.5	6.1	2/23/2010
41	2PT00023*BD	March 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.835	3/1/2010
42	2PT00023*BD	March 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	6.76	3/9/2010
43	2PT00023*BD	March 2010	001	00400	pH	1D Conc	6.5	6.2	3/9/2010
44	2PT00023*BD	March 2010	001	00400	pH	1D Conc	6.5	5.6	3/16/2010
45	2PT00023*BD	March 2010	001	00400	pH	1D Conc	6.5	5.7	3/23/2010
46	2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	5.5	4/6/2010
47	2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	6.	4/13/2010
48	2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	5.4	4/21/2010
49	2PT00023*BD	April 2010	001	00400	pH	1D Conc	6.5	6.	4/27/2010
50	2PT00023*BD	May 2010	001	31616	Fecal Coliform	1D Conc	2000	2700.	5/10/2010
51	2PT00023*BD	May 2010	001	00400	pH	1D Conc	6.5	6.2	5/10/2010
52	2PT00023*BD	May 2010	001	00400	pH	1D Conc	6.5	5.7	5/18/2010
53	2PT00023*BD	May 2010	001	00400	pH	1D Conc	6.5	5.9	5/24/2010
54	2PT00023*BD	June 2010	001	00400	pH	1D Conc	6.5	6.3	6/1/2010
55	2PT00023*BD	September 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.735	9/1/2010
56	2PT00023*BD	September 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	3.47	9/27/2010
57	2PT00023*BD	September 2010	001	00400	pH	1D Conc	6.5	6.34	9/27/2010
58	2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.245	10/1/2010
59	2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.11	.12282	10/1/2010
60	2PT00023*BD	October 2010	001	00400	pH	1D Conc	6.5	6.07	10/5/2010
61	2PT00023*BD	October 2010	001	00400	pH	1D Conc	6.5	6.21	10/12/2010
62	2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	6.2	10/26/2010
63	2PT00023*BD	October 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.16	.23467	10/26/2010
64	2PT00023*BD	October 2010	001	00400	pH	1D Conc	6.5	5.77	10/26/2010
65	2PT00023*BD	November 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.74667	11/1/2010
66	2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.65	11/5/2010
67	2PT00023*BD	November 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	10.62	11/10/2010
68	2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.7	11/10/2010
69	2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.8	11/18/2010
70	2PT00023*BD	November 2010	001	00400	pH	1D Conc	6.5	5.69	11/24/2010
71	2PT00023*BD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.28	12/1/2010
72	2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	5.47	12/6/2010
73	2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	5.84	12/8/2010
74	2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	5.4	12/15/2010
75	2PT00023*BD	December 2010	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	4.83	12/22/2010
76	2PT00023*BD	December 2010	001	00400	pH	1D Conc	6.5	4.96	12/22/2010
77	2PT00023*BD	January 2011	001	00530	Total Suspended Solids	30D Conc	12	29.	1/1/2011
78	2PT00023*BD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.18	1/1/2011
79	2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	25.	1/5/2011
80	2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	23.	1/13/2011
81	2PT00023*BD	January 2011	001	00400	pH	1D Conc	6.5	5.78	1/13/2011
82	2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	31.	1/21/2011
83	2PT00023*BD	January 2011	001	00400	pH	1D Conc	6.5	5.37	1/21/2011
84	2PT00023*BD	January 2011	001	00530	Total Suspended Solids	1D Conc	18	37.	1/25/2011
85	2PT00023*BD	January 2011	001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	9.18	1/25/2011
86	2PT00023*BD	January 2011	001	00400	pH	1D Conc	6.5	5.67	1/25/2011