



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

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

Revised April 22, 2010

April 23, 2010

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

Dear Mr. Wilson:

On March 31, 2010, I conducted an inspection of the wastewater treatment plant serving the Western Reserve Local Schools. Mr. John Charville was present and provided information on the maintenance and operation of the plant. Western Reserve Local Schools is currently operating under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PT00023*BD. At the time of my inspection the plant was operating. No samples were taken to verify compliance with permit limits. Our observations and recommendations are as follows:

1. The wastewater is directed through a trash trap, raw wastewater pump station and flow equalization basin prior to entering the aeration tanks. Mr. Charville indicated that the trash trap was recently pumped out and that one of the raw wastewater pumps had recently been taken offline for repairs.
2. The contents of the aeration tank appeared light brown. It was noted that the aeration tanks are operated on a timer and were off at the time of the inspection.
3. There was a blanket of sludge floating on the top of the clarifiers. The water flowing over the clarifier weir appeared to have light solids and was slightly turbid.
4. The sand filters were online and slightly ponded. There was significant sludge build up on both filters.
5. A review of the February 2010, discharge monitoring report (DMR) shows continued effluent limit violations of the Nitrogen Ammonia (NH₃), and pH parameters of your permit. A copy of the violations is enclosed. Your certified operator receives a monthly Preliminary Compliance Report (PCR) email notifying them of the violations. If you would like Ohio EPA to forward a copy of these reports to you please provide us an email address with your written response to this letter.

Mr. Rodge Wilson
April 23, 2010
Page Two

The facility remains in significant non-compliance and in violation of the NPDES schedule of compliance which required the plant to attain compliance with the final effluent limits no later than 15 months after the effective date of the permit. If these violations continue to occur and if satisfactory progress is not made to meet permit limits, it may be necessary to initiate enforcement action to achieve compliance.

6. In a letter from your operator of record dated March 22, 2010, it was indicated that the plant would be pumped out and additional sodium bicarbonate would be added to the plant in order to address the violations. We request that additional follow up information be submitted indicating what portions of the plant were pumped out and where it was hauled. In addition we request information be submitted indicating how much sodium bicarbonate is added to the plant and how often it is added.
7. A one page monthly operations sheet that is maintained by your operator was contained in the control box. In order to comply with record keeping requirements of OAC 3745-7-09 there should be a minimum of the previous three months of operation and maintenance records available for inspection by Ohio EPA at all times. In addition, the rule requires that your operator of record indicate dates and times of arrival and departure on the operations sheet. A copy of OAC 3745-7-09 is enclosed for your review so that the necessary records can be kept and made accessible onsite for inspection by Ohio EPA personnel.

Within fourteen (14) days of receiving this inspection letter, please submit a signed and dated written response indicating how the above noted issues will be addressed and what operation improvements can/will be made to attain compliance with permit limits. If you have any questions regarding the inspection or this letter, please contact me at (419) 373-3003 or via email at andrew.gall@epa.state.oh.us

Sincerely,



Andrew Y. Gall
Environmental Specialist II
Division of Surface Water

/lb

Enclosures

pc: Mr. John Charville,
Eastwood Environmental
Huron County Health Department
~~NWDO-DSW:File w/enclosure~~



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

April 9, 2010

Mr. Charles Swindler, Superintendent
Western Reserve Local School District
3765 U.S. Route 20 E
Collins, Ohio 44826

Dear Mr. Swindler:

On March 31, 2010, I conducted an inspection of the wastewater treatment plant serving the Western Reserve Local Schools. Mr. John Sharville was present and provided information on the maintenance and operation of the plant. Western Reserve Local Schools is currently operating under National Pollutant Discharge Elimination System Permit (NPDES) No. 2PT00023*BD. At the time of my inspection the plant was operating. No samples were taken to verify compliance with permit limits. Our observations and recommendations are as follows:

1. The wastewater is directed through a trash trap, raw wastewater pump station and flow equalization basin prior to entering the aeration tanks. Mr. Charville indicated that the trash trap was recently pumped out and that one of the raw wastewater pumps had recently been taken offline for repairs.
2. The contents of the aeration tank appeared light brown. It was noted that the aeration tanks are operated on a timer and were off at the time of the inspection.
3. There was a blanket of sludge floating on the top of the clarifiers. The water flowing over the clarifier weir appeared to have light solids and was slightly turbid.
4. The sand filters were online and slightly ponded. There was significant sludge build up on both filters.
5. A review of the February 2010 discharge monitoring report (DMR) shows continued effluent limit violations of the Nitrogen Ammonia (NH₃), and pH parameters of your permit. A copy of the violations is enclosed. Your certified operator receives a monthly Preliminary Compliance Report (PCR) email notifying them of the violations. If you would like Ohio EPA to forward a copy of these reports to you please provide us an email address with your written response to this letter. **The facility remains in significant non-compliance and in violation of the NPDES schedule of compliance which required the plant to attain compliance with the final effluent limits no later than 15 months after the effective date of the permit.** If these violations continue to occur and if satisfactory progress is not made to meet permit limits, it may be necessary to initiate enforcement action to achieve compliance.

Mr. Charles Swindler
April 9, 2010
Page Two

6. In a letter from your operator of record dated March 22, 2010, it was indicated that the plant would be pumped out and additional sodium bicarbonate would be added to the plant in order to address the violations. We request that additional follow up information be submitted indicating what portions of the plant were pumped out and where it was hauled. In addition we request information be submitted indicating how much sodium bicarbonate is added to the plant and how often it is added.
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Sincerely,



Andrew Y. Gall
Environmental Specialist II
Division of Surface Water

/lb

Enclosures

pc: Mr. John Charville, w/enclosure
Eastwood Environmental
Huron County Health Department

~~NWDC-DSW File w/enclosure~~

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PT00023

Facility Name Western Reserve Local Schools Expiration Date 2/2012

Facility Address 3765 US Route 20 E Date 3/3/10 Time 1:30 am/pm (pm)

City Collins County Huron Township Townsend

Name and Address of Owner SAME

Person Contacted John Charville, Maintenance Owner Phone _____

Flow: Design _____ GPD Present _____ GPD (metered - estimated)

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 70° Sunny

OEPA Personnel Andrew Gall District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None	X	Clear	X	None	X	Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: Not Observed

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has _____ excellent _____ good X fair _____ poor operation
 b. Plant has _____ excellent _____ good _____ fair _____ poor maintenance
 c. Sand filters have _____ excellent _____ good _____ fair X poor maintenance

d. Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/ solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) _____

Disinfection: (Required May 1 thru Oct.31.)		
IN	OUT	
_____	<u>X</u>	Chlorination Tablets
_____	<u>X</u>	Dechlorination Tablets
_____	<u>X</u>	U.V.

4. Yes X No _____ Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____
 Chronic Violations X _____

5. X _____ Adequate plant safety (Fenced)

6. X _____ Operation and Maintenance Service Name Eastwood Environmental

Frequency of Visits Once/week

Facility Name: Western Reserve

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency: <i>Pumped in last few weeks</i>
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
Aeration Equipment	2	Flow Equalization	Sodium BiCarb Added to Flow (Approx 1.5 yr ago)
	3	Plant Timer <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Cycle Time: Off From 12-4pm On - Rest of Day and Night (Added by Eastwood each visit)
Secondary Treatment	1	Motor/ Blower Unit	
Final Settling	1	Aeration Tank	Color: <i>Light Brown</i> Adequate Aeration: Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
		Clarifier	Sludge Blanket floating on top 2 inches thick approximately
		Sludge Return	In <input type="checkbox"/> Out <input checked="" type="checkbox"/> Plant on timer
		Surface Skimmer	In <input type="checkbox"/> Out <input checked="" type="checkbox"/> Plant on Timer
Tertiary Treatment	1	Fixed Media Clarifier	upflow Clarifier - Sludge Blanket
	2	Surface Sand Filter	From EQ to Sand Filter
		Polishing Pond	
Disinfection		Other	Beds Full of Sludge
	1	Contact Tank	
	1	Chlorine Tube Feeder	
	1	Dechlorination Tube Feeder	
Flow Metering	NA	Ultraviolet (UV)	
	1	Elapsed Pump Time	
Pumps		Recorder (continuous total)	
	1	Raw Wastewater (type)	1 pump off line ^{in repair} (2 pumps)
Sludge Handling		Sand Filter Effluent Dosing	
		Aerated Storage Tank	
Sludge Disposal		Sludge Drying Bed	
		Municipal POTW	
		Landfill	
Advanced Treatment		Land Application	
		Post Aeration	
		Spray Irrigation	
	Other	Eastwood at plant .3/9, 3/16, 3/23	

Detail - Limit Violations

Permit: 2PR00183

Period: 9/1/2009 2/28/2010

Permit No	Facility	Report Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PT00023'	Western Reserve Elem, Jr & Sr HS	Feb 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.18	2/1/2010
2PT00023'	Western Reserve Elem, Jr & Sr HS	Feb 2010	001	00400	pH	1D Conc	6.5	6.2	2/2/2010
2PT00023'	Western Reserve Elem, Jr & Sr HS	Feb 2010	001	00400	pH	1D Conc	6.5	6.1	2/23/2010