



**Environmental
Protection Agency**

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

March 24, 2011

RE: ODOT COLEBROOK 04-42 REST AREA
NPDES PERMIT NO. 3PP00016
COLEBROOK TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Thomas Wathen
Head of Building Maintenance
Ohio Department of Transportation
2088 S. Arlington Rd.
Akron, Ohio 44306

Dear Mr. Wathen:

On March 17, 2011, a site inspection was conducted at the above referenced facility on the west side of State Route 11 south of U.S. 6, Colebrook Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. David Park represented the Ohio Department of Transportation (ODOT). The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on March 30, 2010.

The system consists of a trash trap, extended aeration tanks, clarifiers, fixed media filters, dosing tank, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the sludge tanks when needed to another POTW. The facility discharges to an unnamed tributary to Mosquito Creek adjacent to the west side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations

Following are observations made during the inspection.

1. The design flow of the extended aeration plant is 10,000 gallons per day, although the plant is not receiving anywhere near that flow. The plant operates continuously.
2. The plant is operated by David Park who also operates the Dorset Outpost and the Rome Outpost WWTPs on behalf of ODOT.
3. The Colebrook Rest Area 04-42 WWTP was shut down and pumped out between July 6, 2010 and December 14, 2010, commencing operations again the third week of December, 2010. The plant was reseeded to restart the plant.
4. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.

5. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash is pumped out every 4 to 6 months and containerized for disposal at a solid waste landfill.
6. The trash trap appears to have been recently cleaned. Mr. Park confirmed that the trash trap contents were removed in December 2010.
7. The content of the aeration tank had a medium color and good mixing. Sludge returns were a medium brown color with minimal foaming. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition. The contents of the entire system were pumped out in July 2010 and the plant reseeded and restarted in December 2010.
8. The surface of the clarifier was clear. The skimmers were found in operating condition. Effluent channels were clean and Mr. Parks indicated that channels were scraped down weekly.
9. The north fixed media filter pump was disassembled; however a new pump was on site with plans to install the pump later in the day. All flow of the plant is therefore diverted through the south fixed media filter. The south filter appeared to be in operating condition, producing a clear effluent.
10. Surface sand filter dosing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
11. Surface sand filters were clean and operable, and reasonably free of vegetation. A small amount of leaf litter was noted, typical for late winter. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
12. The final effluent was clear. The final discharge at the tributary to Mosquito Creek could not be observed due to local weather conditions.
13. The sludge holding tank was being aerated. Mr. Parks indicated that sludge is normally removed and hauled to another POTW approximately twice per year; however this year the entire contents were removed in July 2010 and with the plant just starting operations a few months ago, little sludge has accumulated.
14. Samples are collected by Mr. Parks. Mr. Parks performs on-site analysis of pH and DO. Mr. Parks also records the visual observations of odor, color, turbidity, and flow.
15. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.

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16. Mr. Park submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
17. Electrical outages have occurred in the past which caused plant upsets. Damage to equipment is now minimized by shutting down the entire plant if partial power is lost to the facility, and the plant must be manually restarted following a power outage. Currently, no backup generator is present on the site.

NPDES Permit Compliance Review

ODOT operates the Colebrook Rest Area 04-42 WWTP under NPDES permit No. 3PP00016*FD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February, 2010 through February 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance noted are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residual	1D Conc	0.019	.12	5/28/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	12.6	6/1/2010
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.057	.09538	6/1/2010
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	2.3	12.6	6/8/2010
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.087	.09538	6/8/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	3.52	6/8/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	1.41	6/16/2010
001	50060	Chlorine, Total Residual	1D Conc	0.019	2.2	6/29/2010

Ohio EPA notes that the above referenced nitrogen-ammonia and chlorine residual violations placed ODOT in significant noncompliance, and Ohio EPA notified you of this via letter on August 5, 2010. To-date no response has been received. A written explanation as to why the above limit violations occurred must be provided along with measures to ensure that they are not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

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Reporting Violations

No reporting code or frequency violations were noted for the period reviewed.

Compliance Schedule

Ohio EPA notes the following regarding your compliance schedule contained within your NPDES permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
10/1/2010	9/30/2015	10/01/2011		95999	Other	E. Coli Status Report
10/1/2010	9/30/2015	11/01/2011		-----	Other	Disinfection PTI if Needed
10/1/2010	9/30/2015	12/01/2011		95999	Other	E. Coli Status Report
10/1/2010	9/30/2015	03/01/2012		05699	Other	Operational Level Attained

As milestones are not yet due, no response is needed.

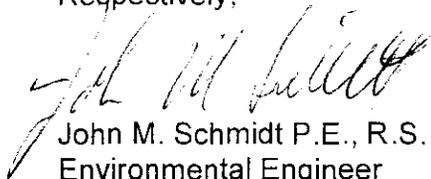
Based upon the inspection findings and the overall compliance record of the facility, the Ohio Department of Transportation is considered to be in substantial compliance with the terms and conditions of its NPDES permit for the ODOT Colebrook Rest Area 04-42 WWTP.

Comment

Based upon the inspection findings and discussions with plant personnel, Ohio EPA recommends that ODOT consider backup generators for this facility.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

pc: Dave Park, ODOT Seven Hills Garage

File: SP/Ashtabula/Colebrook Twp./ODOT Colebrook Rest Area 04-42 (3PP00016)