



**Environmental
Protection Agency**

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

March 18, 2011

RE: ODOT DORSET MAINTENANCE OUTPOST
NPDES PERMIT NO. 3PP00041
DORSET TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

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 at 3225 State Route 193, Dorset 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, clarification, 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 Mill Creek adjacent to the north 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 1000 gallons per day, although the plant is not receiving anywhere near that flow. The plant operates on a timer for a few hours in the morning and few hours in the afternoon when the plant receives flow.
2. The plant is operated by David Park who also operates the Rome Outpost and the Colebrook Rest Area 04-42 WWTPs on behalf of ODOT.
3. The Dorset Outpost WWTP was shut down and pumped out between May and November, 2010, commencing operations again the second week of December, 2010. The plant was reseeded to restart the plant.

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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 was containerized for disposal at a solid waste landfill.
6. The plant appears have tank tops that sit at the ground surface within the drainage area of the building and parking area, diverting storm water and snow melt into the tanks. This is not acceptable and places an undue hydraulic burden on the WWTP. The tanks must have a riser or other means of diverting storm water from running into the tops of the tanks through the grating.
7. The content of the aeration tank had a medium brown color, and had working sludge return lines, but no aeration was reaching the tank. Sludge returns were a light brown to clear color with minimal foaming. The sides of the clarifiers should be scraped down to divert sludge to the return lines. The blowers were cycled and found in operating condition, but apparently there is a problem with the piping. Mr. Parks indicated that he would be addressing this issue today. The alarms were tested and found in operating condition.
8. The surface of the clarifier was clear. Skimmers were in operating condition. The plant was turned on for purposes of the inspection. Effluent channels were clean.
9. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
10. Surface sand filters were clean and operable. 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.
11. The final effluent was of acceptable visual quality. The final discharge was observed in acceptable visual quality in the manhole on ODOT's property prior to the final outfall. The final discharge at Mill Creek could not be observed as it is located on private property.
12. 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.

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13. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
14. Mr. Park submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
15. The facility also installed a 500 gallon oil/water separator and a 6,000 gallon holding tank for the vehicle maintenance building.
16. Materials from the holding tank are removed for off-site solidification and disposal at a municipal solid waste landfill. Liquids were last removed in July 2010. Liquids are hauled by a contracted licensed waste hauler.
17. Two 1,000 gallon fuel tanks (one gasoline, one diesel) are located on the property. These tanks are double walled and sit on a concrete pad. No evidence of a release as observed during the inspection.
18. A single walled brine tank is located on the property for making a deicing solution.

NPDES Permit Compliance Review

ODOT operates the Dorset Outpost WWTP under NPDES Permit No. 3PP00041*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2010 through February 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance 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	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	31.8	3/1/2010
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	31.8	3/1/2010

The March 2010 violations were discussed during the 2010 inspection. Mr. Parks acknowledged that ammonia discharge levels are an ongoing problem due to low strength wastewater. Mr. Parks indicated that ODOT is open to any recommendations for a low-cost workable solution to the ammonia problem. Ohio EPA DSW's Compliance Assistance Unit (CAU) may be able to assist you in this matter. Please feel free to contact Keith Kroeger at (614) 644-2001 or via email at Keith.Kroeger@epa.state.oh.us

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if you would like assistance from Ohio EPA DSW CAU. As these violations have already been discussed with Ohio EPA, no additional information is needed to respond to the violations at this time.

Reporting Violations

No reporting violations were noted for the period reviewed.

Compliance Schedule

No compliance schedule violations were noted for the period reviewed.

If ODOT 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.

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 Dorset Outpost WWTP.

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/Dorset Twp./ODOT Dorset Outpost (3PP00041)