



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 31, 2010

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

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

Dear Mr. Oberdorfer:

On March 30, 2010, 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 January 8, 2008.

The system consists of a trash trap, extended aeration tanks, clarification, rapid sand filtration, chlorine disinfection, and dechlorination. Sludge management consists 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 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.
3. The content of the aeration tank had a light color and good mixing. Sludge returns were a light brown color with minimal foaming. The surface of the clarifier was clear. The plant was turned on for purposes of the inspection. Effluent channels were clean.

4. Rapid sand filters were clean and operable, however some leaf litter was noted. 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.
5. The final effluent was clear. The final discharge at Mill Creek could not be observed as it is located on private property.
6. Samples are collected by Mr. Parks. Mr. Parks performs on-site analysis of pH and DO.
7. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
8. Mr. Park submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
9. The facility also installed a 500 gallon oil/water separator and a 6,000 gallon holding tank for the vehicle maintenance building .The system was approved under PTI No. 611176.
10. Materials from the holding tank are removed for off-site solidification and disposal at a municipal solid waste landfill. Liquids are hauled by a contracted licensed waste hauler.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period January 1, 2008 through March 30, 2010 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	12.	3/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	12.	3/1/2008
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	13.	3/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	13.	3/8/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.6	12/1/2008
001	00610	Nitrogen, Ammonia (NH3	7D Conc	4.5	4.6	12/1/2008

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

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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. if you would like assistance from Ohio EPA DSW CAU.

Reporting Violations

The following reporting violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00056	Flow Rate	1/Month	1	0	01/01/2008

Compliance Schedule Violations

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. E-mailing 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 facility is considered to be in substantial compliance; however the above limit and reporting violations should be explained, along with a resolution.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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