

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

April 4, 2011

RE: ASHTABULA COUNTY JV SCHOOL
OHIO EPA PERMIT 3PT00029
JEFFERSON TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Keith Biber, Business Manager
Ashtabula County Joint Vocational School
1565 State Route 167
Jefferson, Ohio 44047

Dear Mr. Biber:

On March 31, 2011, a site inspection was conducted at the above referenced facility at 1565 State Route 167, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, with you and Mr. Rick Stuart representing Ashtabula County Joint Vocational School (JVS) and Mr. Roger Osborne representing Lewis Wastewater Management, your operator, during the inspection. 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 April 21, 2010.

The system consists of a trash trap, equalization tank, extended aeration system with clarifier, wet well/lift station, dosing chamber, rapid sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The facility discharges to a manhole adjacent to the facility, where it joins runoff from the parking lot. Ultimate discharge is through a series of manholes to Mill Creek adjacent to the east side of Garrett Road and east of the facility. No backup power is provided to the facility, and the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 40,000 gallons per day. The plant operates continuously, and was not discharging at the time of the inspection.
2. At the time of the inspection a new building was under construction at the Ashtabula County JVS campus. Per discussions with you, the current flow from the campus is less than one fourth the design capacity of the wastewater plant, and that sewers serving the building had already been installed.
3. Prior to June 9, 2010, the plant was operated by Mark Verzella of the Ashtabula County Department of Environmental Services (ACDES) on behalf of Ashtabula County JVS. Between June 9, 2010 and November 3, 2010, the Ashtabula Co. JVS had no operator of record, with ACDES providing laboratory analysis on a contract

basis. Since November 3, 2010, the plant has been operated Dustin Lewis of Lewis Wastewater Management on behalf of Ashtabula County JVS. Mr. Lewis is listed as the operator of record for this facility. Mr. Rick Stuart and Mr. Virgil Cole in your maintenance department perform the daily operations at the WWTP.

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 maintained. Collected trash was containerized for disposal at a solid waste landfill.
6. The content of the aeration tank had a slight earthy odor, chocolate brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. The return activated sludge (RAS) lines were noted as clear. Blowers were cycled and found to be operating properly. This is an indicator of a properly operating aeration system.
7. The surface of the clarifier was reasonably clear with scum directed to the skimmer. Effluent channels and weirs were in acceptable condition. As noted above, the RAS lines are clear, suggesting that the sides of the clarifier may need to be scraped down to direct sludge to the RAS pumps. Both the sludge return lines and skimmer were operating properly at the time of the inspection.
8. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
9. Surface sand filters were reasonably clean and operable. The south filter bed had an accumulation of sludge that should be removed as soon as weather permits. The plant was discharging to the north bed at the time of the inspection. 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.
10. Chlorination and dechlorination systems were installed, but not operating at the time of the inspection. The systems are not required to be operating at the time of the inspection as it was outside the disinfection season of May through October. The WWWTTP effluent running through the disinfection tank was noted as clear and of acceptable visual quality.
11. The final discharge pipe at the tributary to Mill Creek was not observed due to snow cover. The soil washout around the manhole on the hillside between Garrett Rd. and Mill Creek observed during the April 2010 inspection has been repaired.

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12. The sludge holding tank has been pumped out annually. Northeast Septic Tank Service hauled the sludge to the Geneva-on-the Lake WWTP and the Northeast Ohio Regional Sewer District. The tanks were pumped out in late 2009 and no sludge was removed in 2010.
13. Lewis Wastewater management monitors and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Laboratory analysis prior to November 3, 2010 was performed by Micobac Laboratories of Meadville, PA, and analysis after November 3, 2010 has been performed by Clean Streams of Madison, OH.

NPDES Permit Compliance Review

The Ashtabula County Joint Vocation School operates under Permit 3PT00029*ED. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2010 through February 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	13.	5/1/2010
001	31616	Fecal Coliform	1D Conc	2000	2000.	8/4/2010

A review of Ohio EPA indicates that Ashtabula County JVS provided a verbal explanation of the suspended solids violation on May 25, 2010, and a written explanation regarding the bacteria violation on September 20, 2010. No additional information is required to address these violations.

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.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule

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

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Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
08/03/2006	07/31/2011	09/03/2007	04/29/2009	01299	PTI & Plans	Submit Detail Plans
08/03/2006	07/31/2011	02/03/2008	11/09/2009	03099	Construction	Commence Construction
08/03/2006	07/31/2011	07/03/2008	12/07/2009	04599	Construction	Complete Construction
08/03/2006	07/31/2011	08/03/2008	12/07/2009	05599	Operations	Attain Effluent Limits

As milestones have been completed, no response is needed.

Other Compliance Issues

As noted above, Ashtabula County JVS currently has a building under construction that will be connected to the sanitary sewer system. If the connection is limited to a lateral connection that does not include the extension of the sanitary sewer mains then no permit is required. If the proposed construction resulted in the extension of sewer mains that could serve additional expansion, a sanitary sewer permit-to-install (PTI) is required. Please provide plan drawings of the sanitary sewers associated with this project so that Ohio EPA may evaluate if a sanitary sewer PTI is required. Ohio EPA will also need documentation as to the additional flow to the WWTP that will result from the addition of this building.

Based upon the inspection findings and the overall compliance record of the facility, the Ashtabula County Joint Vocational School is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its WWTP.

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

Respectively,

COPY

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

JMS/mt

pc: Dustin Lewis, Lewis Wastewater Management

File: SP/Ashtabula/Jefferson Twp./Ashtabula County JVS (3PT00029)