



**Environmental
Protection Agency**

Ted Strickland, Governor
Mike DeWine, Lt. Governor
Chris Christie, Director

April 29, 2010

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

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

Dear Mr. Biber:

On April 21, 2010, 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, and you, Mr. Virgil Cole, and Mr. Rick Stuart represented Ashtabula County Joint Vocational School (JVS) 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 January 23, 2009.

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. 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. This is an indicator of a properly operating aeration system.
3. The surface of the clarifier was clear with scum directed to the skimmer. Effluent channels and weirs were in acceptable condition. Both the sludge return lines and skimmer were operating properly at the time of the inspection.
4. Rapid sand filters were recently constructed, clean and operable. The dosing pumps discharge to the filters when enough water accumulates to pump. No discharge to the sand filters was observed during the inspection.

5. Chlorination and dechlorination systems were installed, but not operating at the time of the inspection.
6. The final discharge pipe at the tributary to Mill Creek was observed as clear. It appears that there is some washout of soils around the manhole on the hillside between Garrett Rd. and Mill Creek that must be repaired. The cause of the soil undermining should be investigated and repairs to the manhole and associated piping made as necessary.
7. The sludge holding tank has been pumped out at least three times since the last inspection on January 15, 2009, once on November 25, 2009 and several loads on November 30, 2009. Northeast Septic Tank Service hauled the sludge to the Geneva-on-the-Lake WWTP and the Northeast Ohio Regional Sewer District.
8. Mr. Rick Stuart and Mr. Virgil Cole in your maintenance department performs the daily operations at the WWTP.
9. Ashtabula Department of Environmental Services (ADES) monitors and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Conversations with Mr. Mark Verzella indicate that although Ashtabula County DES collects samples and reports data to Ohio EPA on the eDMR system on your behalf, he is not the operator of record of this facility. An examination of Ohio EPA files indicates that Ashtabula JVS has not notified the agency who the official operator or record for your WWTP.
10. A schedule of compliance has been included in Part 1, C of the permit. It requires the construction of surface sand filters to be added to the wastewater treatment system. You indicated that a permit was obtained, and that construction commenced on November 9, 2009, with the improvements completed on December 7, 2009.

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 January 1, 2009 through March 1, 2010 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	1D Conc	18	25.	12/9/2009
001	00530	Total Suspended Solids	1D Conc	18	44.	10/28/2009
001	00530	Total Suspended Solids	1D Conc	18	24.	1/28/2009

Mr. Keith Biber
Ashtabula County Joint Vocational School
April 29, 2010
Page 3

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 Violations

Based upon a review of Ohio EPA's files, the following is a compliance schedule summary as specified by your permit:

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 all milestones were not attained by the dates specified in your permit, you are in violation of the compliance schedule. You stated during the inspection that the delay was due to obtaining state funding for the engineering and subsequent construction. You provided the dates that construction was completed.

Other Violations

1. Failure to Designate an Operator of Record - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Although you indicated that you believe that you have an operator of record, no official designation has been received by Ohio EPA. An official operator of record must be declared for this facility. Ashtabula County JVS may enter into a contract for the technical services of an appropriately certified operator to inspect, monitor, and supervise the operation thereof provided that a renewable contract, describing the duties and responsibilities of said certified operator, is submitted to and approved by Ohio EPA. To-date, Ohio EPA has not received a contract with an appropriately certified operator. The operator of record designation form may be found at http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf. If you need to contract with a third party operator, for your reference I have attached a list of certified contract operators.

Please provide evidence that you have contracted with an appropriately certified operator to operate your WWTP and submit a copy of the contract and the

Mr. Keith Biber
Ashtabula County Joint Vocational School
April 29, 2010
Page 4

Operator of Record Notification Form to Ohio EPA. When you notify Ohio EPA central offices, please provide a copy of the notification to Ohio EPA Northeast District Office for our records.

Other Comments

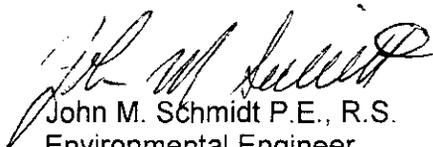
Pursuant to Observation 6 above, Ashtabula County JVS must investigate the cause of the soils washout behind the manhole, make the repairs as expeditiously as possible, and submit a summary report of documenting repairs no later than 30 days from the date of this letter. I have attached a copy of the washout for your reference.

Based on the above information, Ashtabula County JVS is considered to be in substantial compliance with the terms and conditions of the NPDES permit. However, the above items must be addressed.

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 inspection, 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

Att: List of Contract Water and Wastewater Operators, revised March 19, 2010
Photograph of Manhole with Soil Washout, 04-21-2010

File: Ashtabula County JVS (Jefferson Twp) Ashtabula Co./Semipublic P/C



Washout Observed during 04-21-2010 Site Inspection