



Environmental
Protection Agency

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

March 4, 2010

RE: WINDSOR COMMUNITY CENTER
NPDES PERMIT NO. 3PT00074
WINDSOR TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. James E. Plizga, Chairman
Mr. Jeffrey Merritt
Mr. Robert Slusher
Windsor Township Trustees
P.O. Box 223
5430 U.S. Route 322
Windsor, OH 44099

Dear Mr. Plizga, Mr. Merritt, and Mr. Slusher:

On March 3, 2011, a site inspection was conducted at the above referenced facility at 5340 U.S. Route 322, Windsor Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and James Plizga represented the Windsor Township Trustees. 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, equalization tank, extended aeration tank, clarification, dosing tank, surface sand filtration, chlorine disinfection, dechlorination, and post-disinfection aeration. Sludge management of sludge removal from an aerated sludge tank when needed to another POTW. The facility discharges to an unnamed tributary to Phelps Creek adjacent to the east side of the facility. No backup power is provided to the facility.

Observations

Following are observations made during the inspection.

1. The design flow of the extended aeration plant is 2340 gallons per day, based upon when the building operated as an elementary school. Currently the building serves as the township offices and has rooms rented out for a church congregation, evening sports activities, and occasionally for other events. Based on current operations, the plant is not receiving anywhere near that flow, and on most days does not discharge. The blowers operate continuously, with pumps operating manually due to a broken float. As an interim measure, Mr. Plizga operates the pumps manually approximately twice weekly with flows accumulating in the equalization tank. The float should be repaired as soon as conditions permit.

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2. Overall, the plant is well kept.
3. The pumps serving the equalization basin were cycled and found in operating condition, except for the defective float. The alarms were also found in operating condition.
4. The trash trap was inspected and the contents were typical. The trash trap should be inspected monthly and materials removed as necessary. Collected materials should be disposed of at a landfill as you currently do for the cleanouts from the sand filters.
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 content of the aeration tank had a light color and good mixing. The blowers were running and the plant was receiving good aeration. Sludge returns were a light brown color with minimal foaming. The color is typical for a plant that is biologically under-loaded. A medium brown color is more typical for the aeration tank and sludge return lines of a properly operating plant.
7. The surface of the clarifier was clear. Effluent channels were clean.
8. The sand filter dosing pumps were cycled and found in operating condition. The wastewater discharged to the sand beds was observed as clear. The alarms were tested and found in operating condition.
9. Surface sand filters were reasonably clean and operable.
10. The final discharge at the tributary to Phelps Creek was observed and found to be dry. There was an accumulation moss or algal growth on the outlet pipe that should be removed. See attached picture.
11. It has been several years since sludge has been removed from this facility. Sludge should be removed from the facility at least bi-annually or more frequently based upon sludge generation rates.
12. Samples are collected by Mr. Plizga. Mr. Plizga performs on-site observations of temperature, flow, color, and severity.
13. Valley Environmental provides the sample bottles and preservatives and performs laboratory analysis of collected samples. Valley Environmental submits the quarterly data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

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14. Mr. Plizga submits the daily and monthly visual observation data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.

NPDES Permit Compliance Review

The Windsor Community Center operates under NPDES Permit No. 3PT00074*CD. 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.

Effluent Limit Violations

The following effluent limit violations were noted:

<u>Station</u>	<u>Reporting Code</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
001	31616	Fecal Coliform	30D Conc	1000	3400.	6/1/2010
001	31616	Fecal Coliform	7D Conc	2000	3400.	6/8/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	6/9/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	3.6	8/12/2010

Ohio EPA notes that written explanation for the August 12, 2010 event was provided in correspondence dated December 13, 2010. Ohio EPA notes that for the remaining violations, no explanation has been provided. During the site visit you indicated that this may have been attributed to the disinfection tank running out of chlorination tablets, but would have to check your records. A written explanation as to why remaining exceedence events occurred must be provided, along with measures to ensure that they are not repeated. A written response to these events must be provided.

Reporting Violations

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

Compliance Schedule Violations

No compliance schedule violations were noted for the time period reviewed. During the site visit, we discussed that page 5 of your new NPDES permit, as effective September 1, 2010, requires Windsor to evaluate the effectiveness of its facility for compliance with E. Coli standards and if needed to submit a permit-to-install for plant improvements. Although the compliance schedule required you to submit a status report by March 1, 2011, Ohio EPA understands because of the timing of the permit issuance at the end of the disinfection season last year, you have not had the opportunity to collect E. Coli data for this facility. Ohio EPA has initiated an NPDES permit modification to extend this schedule by six months to allow data to be collected and evaluated.

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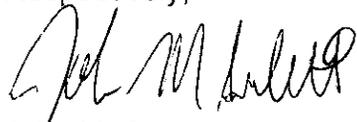
Comments

Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. During our site visit, you indicated that you have previously submitted this information to Ohio EPA. No official designation has been received by Ohio EPA Central Office. During our visit, you completed the operator of record form for Ohio EPA to forward to Ohio EPA's Operator Certification Unit. I have forwarded your designation to the Operator Certification unit and have provided you a copy of the designation for your records.

Based upon the inspection findings and the overall compliance record of the facility, the Windsor Township Trustees is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its Windsor Township Community Center. The above limit violations should be explained, along with a resolution, and the operator of record form submitted to Ohio EPA's operator certification unit with a photocopy provided to the district office.

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

attach: Executed Operator of Record Notification Form

pc: File SP/Ashtabula/Windsor Twp./Camp Whitewood 3PT00074



Final Effluent Discharge Line with Dried Algal Growth or Moss