



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 ROME MAINTENANCE OUTPOST
NPDES PERMIT NO. 3PP00044
ROME 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 5451 State Route 45, Rome 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 October 6, 2009.

The system consists of a trash trap, extended aeration tanks, clarification, rapid sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management consists of sludge removal from the sludge tanks when needed to another POTW. The facility discharges to a pond/unnamed tributary of Plum Creek adjacent to the west 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 1500 gallons per day, although the plant is not receiving anywhere near that flow. The plant operates on a timer for three hours in the morning and three hours in the afternoon when the plant receives flow. This plant was recently constructed in the fall of 2009.
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. 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 the pond could not be observed as it was partially submerged by the pond/tributary.
6. As noted during the October 6, 2009 inspection and in the November 9, 2009 letter from Michael Stevens, PTI Application No.611176 was approved for an on-site mound system. It was determined since the issuance of the PTI that the approved treatment system could not be constructed due to the lack of acceptable soils in the area where the proposed mound treatment system was to be constructed, and the extended aeration plant was constructed instead.
7. As noted during the October 6, 2009 inspection and in the November 9, 2009 letter from Michael Stevens, existing sampling station is not acceptable. A proper sampling station allows for a free falling sample to be taken. A proper sample station must be installed. The November 9, 2009 letter requested this information and to-date a proper sampling station has not been installed.
8. As noted during the October 6, 2009 inspection and in the November 9, 2009 letter from Michael Stevens, as-built detail plans are required to be submitted for the surface sand filter beds, chlorination unit, dechlorination unit, and an acceptable sample port. A new Permit-to-Install application along with the appropriate fees shall be submitted for the treatment units installed at the facility which deviated from the approval under PTI No. 611176. Correspondence from this office dated April 1, 2008, previously requested submission of this permit-to-install application. To date, this office has no record of receiving this PTI application.
9. Samples are collected by Mr. Parks. Mr. Parks performs on-site analysis of pH and DO.
10. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
11. Mr. Park submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
12. 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.

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13. 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 October 1, 2009 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

No limit violations were noted for the period reviewed.

Reporting Violations

No reporting violations were noted for the period reviewed.

Compliance Schedule Violations

The following compliance schedule violations were noted:

<u>Permit Effective Date</u>	<u>Permit Expiration Date</u>	<u>Schedule Due Date</u>	<u>Completion Date</u>	<u>Event Code</u>	<u>Schedule Type</u>	<u>Schedule Milestone</u>
10/1/2008	9/30/2013	1/1/2009	No record	1299	Construction	Final Plan Submitted
10/1/2008	9/30/2013	7/1/2009	No record	3099	Construction	Begin Construction
10/1/2008	9/30/2013	9/1/2009	No record	4599	Construction	End Construction
10/1/2008	9/30/2013	10/1/2009	No record	5599	Construction	Operational Level Attained

If ODOT feels 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.

During my discussions with Mr. Parks, his recollection is that ODOT commenced construction in September 2009 and completed construction in late October or early November 2009, and anticipates final grading and establishment of vegetation in the spring of 2010. Please provide the specific completion dates for the above referenced milestones. ODOT will remain in violation of its compliance schedule until overdue milestones have been completed.

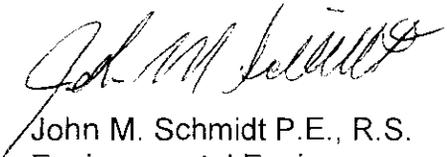
Based upon the inspection findings and the overall compliance record of the facility, the facility is considered to be in substantial compliance; however the above compliance schedule violations should be explained, along with a resolution.

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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,

A handwritten signature in black ink, appearing to read "John M. Schmidt". The signature is written in a cursive style with a large initial "J" and "S".

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

JMS/mt