



**Environmental
Protection Agency**

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

March 18, 2011

RE: ODOT ROME MAINTENANCE OUTPOST
NPDES PERMIT NO. 3PP00044
ROME TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

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

Dear Mr. Wathen:

On March 17, 2011, 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 March 30, 2010.

The system consists of a trash trap, extended aeration tanks, clarification, surface sand filtration, chlorine disinfection, dechlorination, and post disinfection aeration. Sludge management 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, and a revised permit-to-install reflecting as-built components was issued on November 18, 2010.
2. The Rome Outpost WWTP was shut down and pumped out between May and November, 2010, commencing operations again the second week of December, 2010. The plant was reseeded to restart the plant.

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3. The plant is operated by David Park who also operates the Dorset Outpost and the Colebrook Rest Area 04-42 WWTPs on behalf of ODOT.
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 kept. Collected trash was containerized for disposal at a solid waste landfill.
6. The content of the aeration tank had a medium brown color and good mixing. Sludge returns were a medium brown color with minimal foaming. This is an indication of a plant in proper operation. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The surface of the clarifier was clear. The plant was turned on for purposes of the inspection. Effluent channels and weirs were clean.
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 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.
10. The final effluent was clear as observed in a manhole between the plant and the final outfall. The final discharge at the pond could not be observed as it was partially submerged by the pond/tributary.
11. Samples are collected by Mr. Parks. Mr. Parks performs on-site analysis of pH and DO and performs observations of flow, color, odor, and turbidity.
12. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.
13. Mr. Park submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system.
14. 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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15. Materials from the holding tank are removed for off-site solidification and disposal at a municipal solid waste landfill. Liquids were last removed in July 2010. Liquids are hauled by a contracted licensed waste hauler.
16. Two 1,000 gallon fuel tanks (one gasoline, one diesel) are located on the property. These tanks are double walled and sit on a concrete pad. No evidence of a release as observed during the inspection.
17. A single walled brine tank is located on the property for making a deicing solution.

NPDES Permit Compliance Review

ODOT operates the Rome Outpost WWTP under NPDES Permit No. 3PP00044*BD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2010 through February 1, 2011 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	25.3	3/1/2010
001	00610	Nitrogen, Ammonia NH3	7D Conc	4.5	25.3	3/1/2010
001	00530	Total Suspended Solids	30D Conc	12	26.	12/1/2010
001	00530	Total Suspended Solids	7D Conc	18	26.	12/8/2010

The ammonia-nitrogen violations were discussed at the 2010 compliance inspection and ODOT notified Ohio EPA by phone regarding the suspended solids violations and were addressing each issue. No additional information is needed to respond to the violations.

Reporting Violations

No reporting violations were noted for the 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
10/1/2008	9/30/2013	1/1/2009	05/21/2007	1299	Construction	Final Plan Submitted
10/1/2008	9/30/2013	7/1/2009	09/01/2009	3099	Construction	Begin Construction
10/1/2008	9/30/2013	9/1/2009	10/01/2009	4599	Construction	End Construction
10/1/2008	9/30/2013	10/1/2009	10/01/2009	5599	Construction	Operational Level Attained

As milestones have been completed, no response is needed.

Based upon the inspection findings and the overall compliance record of the facility, the Ohio Department of Transportation is considered to be in substantial compliance with the terms and conditions of its NPDES permit for the ODOT Rome Outpost WWTP.

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

pc: Dave Park, ODOT Seven Hills Garage

File: SP/Ashtabula/Rome Twp./ODOT Rome Outpost (3PP00044)