



**Environmental
Protection Agency**

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

July 6, 2011

RE: ROBERT BYCROFT SCHOOL
COMPLIANCE EVALUATION INSPECTION
NPDES PERMIT NO. 3PT00094
CENTER TOWNSHIP
COLUMBIANA COUNTY

NOTICE OF VIOLATION

Mr. Troy Graft, P.E.
Chief Engineer
Columbiana County Engineer
105 South Market Street
Lisbon, OH 44432

Dear Mr. Graft:

On May 17, 2011, this writer conducted a compliance evaluation inspection of the Robert Bycroft WWTP located at the above referenced address. The County was represented by Mr. Chuck Webber.

The following is a summary of our observations:

The trash trap appeared satisfactory. The aeration tank had a weak color and good role across the tank. The clarifier was producing a marginal effluent with some minor pin floc going over the weirs. There was some scum behind the influent and effluent baffles that must be cleaned. A chlorine tank was present and chlorine tablets were in the effluent trough. No dechlorination was being provided at this facility.

A review of the effluent data from October 2008 through April 2011 has been attached to this correspondence.

As with the other plants, insufficient staffing has been a problem. The County has appeared to already begun addressing this problem. Compliance with the County's NPDES permits will verify if the additional staffing has corrected the problem.

Non Compliance Issues

The school is considered to be in non-compliance for the following violations:

In addition to the effluent violations, the school is in violation with its current NPDES permit for failure to comply with the dates outlined in the schedule of compliance in Part

Mr. Troy Graft, P.E.
Robert Bycroft School
July 6, 2011
Page 2

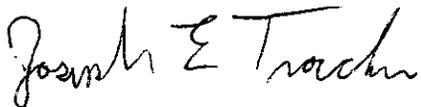
I,C, of the permit. The school has failed to complete construction, and attain operational levels of the improvements. These tasks were to be completed by August 1, 2009. The school has been in violation of this schedule for more than two years.

The schedule violations must be corrected immediately. The existing facilities are not capable of meeting the final effluent limits of the current permit. The Agency elected not to take enforcement action when issuing the current permit because the County agreed to abandon the plant to a new county operated facility. While we are sensitive to the fact that public works funds are not readily available, that does not mitigate the permit violations. Construction must begin on the new facility shortly or this office will be forced to recommend escalated enforcement with the Attorney General's office to address the permit violations.

You are requested to respond in writing within 21 days explaining the circumstances of the violations, and what actions and time lines you are taking to achieve compliance. Non-compliance with NPDES requirements is subject to further enforcement action.

Should you have any comments or questions, feel free to contact me at (330) 963-1193.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

cc: Lori J. Barnes, Columbiana County Health Dept.
Bert Dawson, P.E., Columbiana County Engineer
Chuck Webber, Columbiana County Engineers
Troy Graft, P.E., P.S., Columbiana County Engineers
Columbiana County Commissioners

File: Semipublic/Columbiana County/Center Township/Robert Bycroft School

ROBERT BOYCROFT SCHOOL EFFLUENT VIOLATIONS: OCT 2008 - APR 2011

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PT00094*BD	June 2010	Chlorine, Total Residual	1D Conc	0.019	.72	6/23/2010
3PT00094*BD	June 2010	Phosphorus, Total (P)	30D Conc	1.0	2.7	6/1/2010
3PT00094*BD	June 2010	Phosphorus, Total (P)	7D Conc	1.5	2.7	6/22/2010
3PT00094*BD	August 2010	Chlorine, Total Residual	1D Conc	0.019	1.12	8/12/2010
3PT00094*BD	August 2010	Phosphorus, Total (P)	30D Conc	1.0	2.54	8/1/2010
3PT00094*BD	August 2010	Phosphorus, Total (P)	7D Conc	1.5	2.54	8/8/2010
3PT00094*BD	December 2010	Phosphorus, Total (P)	30D Conc	1.0	2.34	12/1/2010
3PT00094*BD	December 2010	Phosphorus, Total (P)	7D Conc	1.5	2.34	12/8/2010
3PT00094*BD	March 2010	Phosphorus, Total (P)	30D Conc	1.0	2.06	3/1/2010
3PT00094*BD	March 2010	Phosphorus, Total (P)	7D Conc	1.5	2.06	3/8/2010
3PT00094*BD	December 2009	Phosphorus, Total (P)	30D Conc	1.0	2.32	12/1/2009
3PT00094*BD	December 2009	Phosphorus, Total (P)	7D Conc	1.5	2.32	12/15/2009
3PT00094*BD	March 2011	Total Suspended Solids	30D Conc	12	13	3/1/2011
3PT00094*BD	March 2011	Phosphorus, Total (P)	30D Conc	1.0	3.18	3/1/2011
3PT00094*BD	March 2011	Phosphorus, Total (P)	7D Conc	1.5	3.18	3/22/2011
3PT00094*BD	March 2011	Phosphorus, Total (P)	30D Qty	0.019	.02407	3/1/2011