



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 9, 2009

RE: GEAUGA COUNTY
MUNSON TWP
SISTERS OF NOTRE DAME ELEM
NPDES PERMIT #3PR00066 #CD

Sister Debra Doig
Sisters of Notre Dame
13000 Auburn Road
Chardon Ohio 44024

Dear Sister Doig:

On August 27, 2009 this writer met with Mr. Ron Hanish to conduct an inspection of the sewage treatment system serving the above referenced facility. The intent of the inspection was to gather information required to process the National Pollutant Discharge Elimination System Permit (NPDES) modification as requested by the facility. The following is a summary of the inspection, compliance history and review of the NPDES modification application.

According to Agency records, the existing wastewater system consists of a 3,500 gallon trash trap, 16,000 gallon flow equalization tank, 40,000 gallon extended aeration system, 96 square foot fixed media clarifier, ultraviolet disinfection and 13,000 gallon sludge holding tank.

The system was designed to serve 450 students and 290 residents for the convent and infirmary. It is our understanding the school currently accommodates sixteen classes with a classroom size of approximately 30 children for a total student count of approximately 480. The convent and infirmary currently houses approximately 250 residents.

NPDES MODIFICATION

The facility is requesting a modification to the NPDES permit to change the wastewater treatment plant from a Class II to a Class I operation. Altering the wastewater treatment plant classification would alter the staffing requirements that would be required for a Class I wastewater treatment plant. The Ohio Administrative Code (OAC) 3745-07-04 requirements for the minimum staffing hours at a Class II facility versus a Class I facility is shown below:

- Class II wastewater treatment plant must be under the supervision of a Class II certified operator 5 days a week for a minimum of 20 hours per week.

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- Class I wastewater treatment plant must be under the supervision of a Class I certified operator 3 days per week for a minimum of 1.5 hours per week.

The facility has requested to modify the permit because the facility operates at half of its capacity (sometimes less than half) and the treatment plant has exceeded all testing parameters in the last 10 plus years.

This office has no objection to modifying your NPDES permit. In accordance with OAC 3745-07-04, the wastewater treatment plant will be reclassified as a Class I operation when the NPDES permit is modified.

During the inspection, Mr. Hanish inquired if the facility can obtain the services of a Class A operator to operate the plant for up to 30 days as a backup to the Class I operator. It was indicated this would provide alternation of scheduling between the operators. According to OAC 3745-07-04 (c) (2) (c) "The operator of record for a class II, III, or IV treatment works or class II sewerage system may be replaced by a backup operator with a certificate one classification lower than the treatment works or sewerage system for a period of up to thirty consecutive days. The use of this provision does not require notification to the agency." Please be aware, this portion of the rule does not apply to this facility because the wastewater treatment plant will be reclassified as a Class I facility upon the permit modification. As such, a Class I operator can only be replaced with a backup operator with a certificate of the same classification or higher.

INSPECTION SUMMARY

At the time of the inspection, the treatment system was in satisfactory condition and was producing a visually clear effluent. The aeration tanks contained a liquid that appeared to have a good chocolate brown color with some foam present. The tanks were provided with adequate air supply and there was adequate rollover within the tanks. The sludge return lines were turned off during the inspection. It is understood these returns are shut down for a period of time (approximately half a day) in order to obtain a thicker sludge. The flow equalization tank was in good condition and was provided with an adequate supply of air.

The clarifier contained a slight accumulation of solids and floating grease on the surface of the tank. The cause of the solids accumulation and floating grease was not known at the time of the inspection. All grease is intercepted at the grease trap which is located at the headworks of the treatment plant. There is limited food preparation at the school now and all cooking for the elementary school is done at the high school kitchen.

The grease trap is pumped every three months and the trash trap is pumped approximately every four months. The sludge holding tank was in good condition and was provided with adequate aeration.

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The fixed media clarifiers were in satisfactory condition with no solids accumulating on the surface of the media or in the effluent weir. The surface sand filters were in satisfactory condition with effective dosing and draining of the filters visually noticed. The ultra violet disinfection was in satisfactory condition.

During the inspection, it was noted that the influent meter to the wastewater plant was not working. The effluent meter is working properly. The operator inquired whether the facility would need to fix the influent meter or just maintain the effluent meter. Your NPDES permit requires you to monitor flow at the effluent. As such, it is not a requirement to monitor the flow at the influent for your facility. Please note, it may be beneficial to have an influent flow monitor to track the flow coming to the facility for internal record keeping purposes.

VIOLATION SUMMARY

A summary of wastewater treatment plant discharge and frequency violations for the period of August 1, 2007 through August 1, 2009 has been attached to this letter. Please review all plant data to ensure the violations are accurate. Your facility is in non-compliance for discharge and frequency violations. Any reporting errors or eDMR errors must be reported to the Ohio EPA so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly

The NPDES permit modification for this facility is being drafted and will be public noticed in the near future. You will have 30 days from the date of the public notice to submit comments to the Ohio EPA regarding the draft permit.

Should you have any comments or questions regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

Enclosure: violation list

pc: Geauga County Health Department

Discharge Violations:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2008	001	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.79275	3/1/2008
March 2008	001	Nitrogen, Ammonia (NH3	1D Conc	1.5	6.68	3/11/2008
March 2008	001	Nitrogen, Ammonia (NH3	1D Qty	0.23	.35397	3/11/2008

Frequency Violations:

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2008	001	Flow Rate	1/Day	1	0	08/30/2008
August 2008	001	Flow Rate	1/Day	1	0	08/31/2008