



**Environmental
Protection Agency**

Ted Stuebgen, Governor
Lee Fisher, Lt. Governor
Chris Koweski, Director

May 16, 2008

RE: LAKE COUNTY
CONCORD TOWNSHIP
LAMUTH MIDDLE SCHOOL
NPDES PERMIT NO. 3PT00120
APPLICATION NO. OH0134716

NOTICE OF VIOLATIONS

Mr. James Kalis, Superintendent
Painesville Township Board of Education
585 Riverside Drive
Painesville, OH 44077

Dear Mr. Kalis:

On May 6, 2008, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves LaMuth Middle School. The school is served by an extended aeration plant with tertiary treatment and disinfection. The average daily design flow of the plant is 12,000 gallons per day.

At the time of inspection the plant was producing a turbid effluent with a poor visual quality. All treatment units were in operation. The following observations were also noted:

- The influent in the flow equalization tank contained an excessive amount of soapy foam.
- The aeration tank content was not a chocolate brown color which is indicative of a well balanced system.
- The settling tank content was very turbid. A high sludge blanket was apparent. The skimmer was submersed. The sludge return rate may need adjusting.
- The filter beds contained some vegetation. Any vegetation and solids laden sand must be removed and replaced with clean sand. Assurances must be made that 18 inches of Ohio EPA approved filter sand exists on both beds. Ohio EPA approved filter sand has a uniformity coefficient that does not exceed 3.0 and an effective size of 0.4 mm - 1.0 mm. The sand must be raked and evenly distributed across the surface of the filter beds.
- The chlorine contact chamber contained chlorine tablets in the chlorinator and bisulfate tablets in the dechlorinator, as required.
- Foam was observed at the entrance of the chlorine contact chamber. Be advised that pursuant to Ohio Administrative Code 3745-1-04 all waters of the state, "...shall be free from floating debris, oil, scum and other floating materials entering the waters as a result of human activity in amounts sufficient to be unsightly or cause degradation". This would include foam.

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A review of the discharge monitoring reports covering the month of April 2007 to March 2008 revealed the following effluent limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	19.39	3/8/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.88069	3/8/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	19.39	3/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.88069	3/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	13.02	2/8/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.59137	2/8/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	13.02	2/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.59137	2/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	15.12	1/15/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.68675	1/15/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	15.12	1/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.68675	1/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	22.68	12/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	1.03013	12/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	42.56	12/8/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	1.93308	12/8/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	32.62	12/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	1.4816	12/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	10.78	11/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.48963	11/22/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	10.78	11/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.48963	11/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	12.46	10/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	.56593	10/22/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	12.46	10/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	.56593	10/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	5.18	9/15/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	.23528	9/15/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	5.18	9/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	.23528	9/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	4.06	6/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	.18441	6/22/2007
001	00530	Total Suspended Solids	30D Qty	0.545	.54504	6/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	4.06	6/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	.18441	6/1/2007
001	00530	Total Suspended Solids	7D Conc	18	41.	5/22/2007
001	00530	Total Suspended Solids	7D Qty	0.817	1.86222	5/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	42.21	5/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	1.91718	5/22/2007
001	00530	Total Suspended Solids	30D Conc	12	41.	5/1/2007
001	00530	Total Suspended Solids	30D Qty	0.545	1.86222	5/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	42.21	5/1/2007

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	1.91718	5/1/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	14.63	4/22/2007
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.66449	4/22/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	14.63	4/1/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.66449	4/1/2007

A review of the discharge monitoring reports covering the month of April 2007 to March 2008 revealed the following effluent sampling frequency violations:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50060	Chlorine, Total Residual	1/2Weeks	1	0	08/01/2007
001	50060	Chlorine, Total Residual	1/2Weeks	1	0	09/01/2007

As stated in this writer's previous letters, the average daily design flow of the wastewater treatment plant is being reported on the discharge monitoring reports as the daily estimated flow. This practice must cease. *Acceptable methods for estimating daily flow at plants are, in order of preference: 1) elapsed time meters on sand filter dosing pumps; 2) elapsed time meters on influent pumps; or 3) water use records.*

Be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting and compliance scheduling requirements of your NPDES permit may be cause for enforcement pursuant to Ohio Revised Code Chapter 6111.

Within 10 days of the date of this letter, you are required to notify this office, in writing, outlining the corrective action, either actual or proposed, that will be taken to eliminate the above highlighted deficiencies.

Should you have any questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,



Marie Underwood, P.E.
 Environmental Engineer
 Division of Surface Water

MU/mt