



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 15, 2009

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

NOTICE OF VIOLATION

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

Dear Mr. Kalis:

On September 9, 2009, this writer conducted a compliance evaluation inspection of the wastewater treatment plant that serves LaMuth Middle School. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits.

At the time of inspection the plant was producing an effluent with a satisfactory visual quality, in that there was no evidence of solids, oil or grease. The following observations were noted:

- The flow equalization tank was in operation, as required.
- The aeration tank was operating in a satisfactory manner. The mixed liquor was brown in color. The sludge return line and skimmer line were in operation.
- The settling tank content was turbid.
- The filter beds contained excessive amounts of 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.

A review of the discharge monitoring reports covering the month of April 2008 to July 2009 revealed the following effluent limitation violations:

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	9.38	11/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	9.38	11/22/2008
001	80082	CBOD 5 day	30D Qty	0.454	.4542	6/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	12.53	5/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	12.53	5/8/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	.56911	5/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	.56911	5/8/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.6	5/13/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	6.58	10/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	6.58	10/22/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	10.78	1/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	10.78	1/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.48963	1/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.48963	1/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	3.36	5/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	3.36	5/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.045	.15261	5/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.068	.15261	5/8/2009
001	00530	Total Suspended Solids	30D Qty	0.545	.54504	7/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	8.96	2/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	8.96	2/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.40696	2/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.40696	2/1/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	13.09	3/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	13.09	3/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.59455	3/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.59455	3/8/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	6.02	12/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	8.54	12/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.27343	12/1/2008
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.38789	12/1/2008
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	5.04	4/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	5.04	4/15/2009
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.136	.22892	4/1/2009
001	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.204	.22892	4/15/2009

A review of the discharge monitoring reports covering the month of April 2008 to July 2009 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	10/01/2008

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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; 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.

This office has received your application for renewal of your NPDES permit. The application states as the facility name, Auburn Middle School. Since the name of the school has been changed, please submit to this office, a letter authorizing this Agency to change the NPDES permit facility name to LaMuth Middle School. The letter must be signed by the Superintendent.

The NPDES permit will be drafted soon. When the permit is drafted, please review it carefully. A 30-day comment period will be provided. All comments or questions must be submitted to this office in writing.

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

cc: Bob Hoyt, Maintenance Supervisor