



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

December 11, 2009

RE: LAKE COUNTY
KIRTLAND
KIRTLAND LOCAL SCHOOL DISTRICT
APPLICATION NO. OH0044644
NPDES PERMIT NO. 3PT00023

Superintendent Stan Lipinski
Kirtland Local School District
Board of Education
9258 Chillicothe Road
Kirtland, OH 44094

Dear Mr. Lipinski:

On December 7, 2009, a compliance evaluation inspection of the sewage treatment plant serving the high school, junior high school and elementary school was conducted by this writer. The purpose of the inspection was to evaluate the facility's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. Mr. Dave Osbood, grounds worker employee, represented the school district. The existing 30,000 gpd treatment plant consists of a trash trap, extended aeration plant, dosing chamber, surface sand filter and disinfection facilities.

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

- The cover of the influent manhole to the plant continues to be unseated. This could potentially be a safety hazard. The cover should be placed in its seated position.
- The aeration tank mixed liquor was dark brown in color, with high solids content. The return sludge line was dark brown.
- A significant amount of sludge was behind the baffles and in the effluent weir. The sludge wasting frequency may need to be increased.
- The surface of the south filter bed was in use and contained some sludge and vegetation. The north filter bed was not in use. Once the filter bed drains, all sludge, vegetation and sludge laden sand must be removed from the surface of the sand filters. Each filter bed must contain 18 inches of Ohio EPA approved filter sand. Approved filter sand consists of clean and washed sand with an effective size between 0.4 and 1.0 mm and a uniformity coefficient not greater than 3.0. The filter sand must be raked with an even distributed across the surface area of the filter bed.
- The chlorine contact chamber contained a chlorinator, but no de-chlorinator. A de-chlorinator is necessary to meet the permitted chlorine residual during the summer months.

The above referenced deficiencies should be corrected immediately.

A review of the monthly operating reports covering the period of March 2008 to October 2009, revealed the following effluent limitation violation at Outfall 001:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Conc	18	32.	3/1/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/1/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/2/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/3/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/4/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/5/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/8/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/9/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/10/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/11/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/12/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/18/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/19/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/22/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/23/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/24/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/25/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/26/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/29/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	9/30/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.4	6/2/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.4	6/3/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.4	6/4/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.4	6/5/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.4	6/6/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/9/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/10/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/11/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/12/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/13/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/16/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/17/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.3	6/18/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/19/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/20/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/23/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/24/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/25/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/26/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/27/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.2	6/30/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/18/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/21/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/22/2008

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/23/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/24/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/25/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/28/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/29/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/30/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/31/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/1/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/4/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/5/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/6/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/7/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/8/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/11/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	8/12/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/13/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/14/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/15/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/18/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/19/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/20/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/21/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/22/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/25/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/26/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/27/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/28/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	8/29/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.14	5/1/2008
001	00530	Total Suspended Solids	7D Conc	18	25.	4/8/2008
001	50060	Chlorine, Total Residu	1D Conc	0.019	.19	7/1/2009

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

This writer was unable to locate the operation and maintenance log book. Pursuant to Ohio Administrative Code 3745-7-09, this agency requires the owner and operator of record of a wastewater treatment plant to maintain operation and maintenance records for the wastewater treatment plant. The records shall be housed onsite and shall be accessible for twenty-four hour inspection. Some of the information that must be recorded includes the identification of the treatment works, date and times of arrival and departure for the operator of record, specific operation and maintenance activities that affect the quality or quantity of sewage or effluent produced, results of tests performed and samples taken, performance of preventative

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maintenance and repairs, and identification of the persons making the entries. In addition the administrative code requires any owner of a sewage treatment works who enters into a contract with a certified operator to maintain a copy of the contract onsite at the treatment works. Please carefully review Ohio Administrative Code 3745-7-09 for information on all requirements. The code can be accessed at: <http://www.epa.state.oh.us/dsw/rules/effectiverules.html>.

This office has been notified that the Lake County Board of Commissioners had adopted on March 31, 2009, a resolution authorizing the advertising of bids for the construction of the gravity sewer, force main and pump stations along State Route 306 that will discharge to the Gary L. Kron Water Reclamation Facility. Construction of the sewer project has commenced. Once the sewer construction is completed and the sewer is operational, this office will require connection to the public sanitary sewer and the demolition of the Kirtland Local School District WWTP. The NPDES permit for the school district will be revoked, once this office receives a letter stating that the plant has been demolished.

Please inform this office, in writing, within 10 days, the reason for the above referenced violations, as well as a description of the actions taken to prevent any further violations. Your response should include proposed dates for completion of the actions

Should you have any questions, do not hesitate to contact this office at (330) 963-1183.

Sincerely,



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

MU/mt