



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

November 2, 2007

RE: LORAIN COUNTY
OBERLIN
FIRELANDS LOCAL SCHOOL DISTRICT
(NPDES PERMIT NO. 3PT00095*AD)

NOTICE OF VIOLATION

Mr. Michael T. Englert
Firelands Local School District
11970 Vermilion Road
Oberlin, OH 44074

Dear Mr. Englert:

On October 18, 2007, an inspection of the above referenced facility's wastewater treatment system was conducted by this writer, and Mr. John Sabo of the Lorain County Health Department. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition, and to assess compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits.

During the inspection, the following observations were made:

1. The aeration tank was being aerated, and the contents were watery brown in color. There was no foam observed on the surface of the water.
2. The sludge return line appeared to be not working properly. Both the return sludge and skimmer lines should be checked for proper operation.
3. Scum build-up was present behind the influent baffle of the settling tank, and is in need of removal.
4. The effluent trough was clean and exhibited no solids buildup.

A review of the Monthly Operating Reports (MORs) submitted for the WWTP since our last inspection found the following final effluent limit numeric violations:

Firelands Elementary and High Schools
NPDES Permit (3PT00095)
Final Effluent Numeric Violations
(March 2007 – October 2007)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	Total Suspended Solids	30D Conc	12	132.	3/1/2007
March 2007	Total Suspended Solids	7D Conc	18	132.	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	4.79	3/1/2007
March 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	4.79	3/1/2007
March 2007	CBOD 5 day	30D Conc	10	20.	3/1/2007

Mr. Michael T. Englert
 Firelands Local School District
 November 2, 2007
 Page 2

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	CBOD 5 day	7D Conc	15	20.	3/1/2007
March 2007	Dissolved Oxygen	1D Conc	6.0	5.32	3/29/2007
April 2007	Total Suspended Solids	30D Conc	12	37.	4/1/2007
April 2007	Total Suspended Solids	7D Conc	18	37.	4/1/2007
April 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	54.7	4/1/2007
April 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	54.7	4/1/2007
April 2007	CBOD 5 day	30D Conc	10	20.	4/1/2007
April 2007	CBOD 5 day	7D Conc	15	20.	4/1/2007
April 2007	pH	1D Conc	9.0	10.13	4/20/2007
April 2007	Dissolved Oxygen	1D Conc	6.0	3.2	4/27/2007
May 2007	Total Suspended Solids	30D Conc	12	126.	5/1/2007
May 2007	Total Suspended Solids	7D Conc	18	126.	5/1/2007
May 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	34.4	5/1/2007
May 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	34.4	5/1/2007
May 2007	CBOD 5 day	30D Conc	10	16.	5/1/2007
May 2007	CBOD 5 day	7D Conc	15	16.	5/1/2007
May 2007	Chlorine, Total Residual	1D Conc	0.019	.13	5/4/2007
May 2007	Dissolved Oxygen	1D Conc	6.0	5.8	5/11/2007
May 2007	Chlorine, Total Residual	1D Conc	0.019	.81	5/18/2007
May 2007	pH	1D Conc	6.5	5.46	5/18/2007
May 2007	Dissolved Oxygen	1D Conc	6.0	4.57	5/18/2007
May 2007	Chlorine, Total Residual	1D Conc	0.019	.48	5/25/2007
May 2007	pH	1D Conc	6.5	5.15	5/25/2007
June 2007	Total Suspended Solids	30D Conc	12	67.	6/1/2007
June 2007	Total Suspended Solids	7D Conc	18	67.	6/1/2007
June 2007	Nitrogen, Ammonia (NH3-N)	30D Conc	1.0	6.2	6/1/2007
June 2007	Nitrogen, Ammonia (NH3-N)	7D Conc	1.5	6.2	6/1/2007
June 2007	Chlorine, Total Residual	1D Conc	0.019	.79	6/1/2007
June 2007	pH	1D Conc	6.5	6.14	6/1/2007
June 2007	Dissolved Oxygen	1D Conc	6.0	1.1	6/1/2007
June 2007	pH	1D Conc	6.5	5.42	6/8/2007
June 2007	Dissolved Oxygen	1D Conc	6.0	2.6	6/8/2007
June 2007	Chlorine, Total Residual	1D Conc	0.019	.08	6/15/2007
June 2007	pH	1D Conc	6.5	6.08	6/15/2007
June 2007	Dissolved Oxygen	1D Conc	6.0	2.41	6/15/2007
June 2007	pH	1D Conc	6.5	6.08	6/22/2007
June 2007	Dissolved Oxygen	1D Conc	6.0	5.25	6/22/2007
June 2007	Chlorine, Total Residual	1D Conc	0.019	.37	6/29/2007
July 2007	Total Suspended Solids	30D Conc	12	24.	7/1/2007
July 2007	Total Suspended Solids	7D Conc	18	24.	7/1/2007
July 2007	Chlorine, Total Residual	1D Conc	0.019	.12	7/6/2007
September 2007	CBOD 5 day	30D Conc	25	34.	9/1/2007
September 2007	Dissolved Oxygen	1D Conc	5.0	3.68	9/5/2007
September 2007	Dissolved Oxygen	1D Conc	5.0	4.99	9/19/2007
September 2007	Dissolved Oxygen	1D Conc	5.0	2.71	9/26/2007

Mr. Michael T. Englert
Firelands Local School District
November 2, 2007
Page 3

The Firelands Elementary and High School NPDES permit was recently renewed, and went effective September 1, 2007. Contained within the NPDES permit is a Compliance Schedule which outlines various required items that need to be completed according to an established time frame.

The first item, preparation of a General Plan for improvements to the wastewater treatment plant, which would allow it to meet the limitations as contained in the final effluent table, was due by October 1, 2007. The General Plan for improvements was received by this office in May 2006, prior to the required October 1st date.

Please be reminded of the following pending Compliance Schedule due dates:

- December 1, 2007: Detail plans are due for the improvements recommended in the General Plan.
- December 1, 2007, March 1, 2008, and June 1, 2008: A written status report is due on the progress of the wastewater treatment plant upgrade.
- September 1, 2008: Completion of construction of the plant improvements, and attainment of operational levels necessary to meet final effluent limits.

Until the WWTP is upgraded, all efforts should be made to provide as high a level of treatment as possible to the wastewater being generated.

If there are any questions or comments regarding the contents of this correspondence, please contact this office.

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt

cc: John Sabo, Lorain County Health Department