



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 21, 2009

RE: MAHONING COUNTY
BEAVER TOWNSHIP
ST. MARY'S ALZHEIMER CENTER
NPDES PERMIT NO. 3PS00011

Mr. John Masternick, CEO
Windsor House, Inc.
P.O. Box 575
Girard, OH 44420

Dear Mr. Masternick:

On January 11, 2010, this writer conducted an inspection of the wastewater treatment system for the St. Mary's Alzheimer Center located at 1899 West Garfield Road. The intent of the inspection was to evaluate Operations and Maintenance (O&M), and to review the compliance status of the system relative to the NPDES Permit No. 3PS00011.

Observation of Wastewater Treatment System

Following are observations of the treatment system at the time of the inspection.

1. The treatment plant appeared to be well maintained; however, because of its aging condition, the treatment system was considered marginal at the time of the inspection.
2. No comminutor is available for pretreatment of the wastewater prior to entering the aeration tank. There is a bar screen available; however, it appears to be ineffectual.
3. The aeration tank and return sludge had good color indicating a healthy biomass necessary for treatment. The clarifier surface at the weir was free of scum; however, sludge residue was identified in the weir trough. A moderate scum layer was identified behind the first baffle in the clarifier. Two wooden baffles were effective at preventing scum from approaching the effluent weir.
4. Both blowers were operational and providing sufficient air to the treatment system at the time of the inspection. The blowers appeared to be well maintained.
5. The daily log of observations was current through the day of the inspection.
6. The most notable concern was the condition of the effluent. The treated wastewater was cloudy as it discharged to the receiving stream. There were also deposits of sewage sludge identified in the receiving stream. This can be typical of wastewater plants which have no tertiary sand filters for removing particulate matter that pass through the clarifier. Upgrades to the treatment system are necessary in the event the system is maintained.

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Operator of Record

To date, Ohio EPA has no record of the operator of record for the wastewater treatment plant. Part II,B of the NPDES Permit requires that you notify this agency of the operator of record to oversee the technical operation of the treatment plant. Failure to report the operator of record places the St. Mary's Alzheimer Center in violation of the NPDES Permit. The operator of record must be reported immediately. The proper reporting form can be found at <http://www.epa.ohio.gov/dsw/opcert/opcert.aspx>. Please note that the form must be signed by both you and the operator of record.

Plant Staffing

Part II.A.2.a of the NPDES Permit requires that the operator of record be physically present at the wastewater treatment plant in accordance with OAC 3745-7-04(C)(1). The rule requires that an operator with at least a Class I license be present at the plant 3 days per week for a minimum of 1.5 hours per week. Currently there is no licensed operator present at the plant the required time. Whoever is designated as the operator of record must be present at the plant the required time and must maintain operations and maintenance records on site in accordance with OAC 3745-7-09.

Compliance Review

A review of the monthly operating reports was conducted to determine the compliance status relative to the NPDES Permit. The period of review was January through December 2009. Following are violations identified from the Ohio EPA compliance tracking system.

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
April 2009	Dissolved Oxygen	1D Conc	4.0	1.9	4/9/2009
May 2009	Dissolved Oxygen	1D Conc	6.0	3.5	5/14/2009
May 2009	Dissolved Oxygen	1D Conc	6.0	3.7	5/21/2009
May 2009	Dissolved Oxygen	1D Conc	6.0	2.7	5/28/2009
June 2009	Total Suspended Solids	30D Conc	12	16.	6/1/2009
June 2009	Dissolved Oxygen	1D Conc	6.0	4.2	6/4/2009
June 2009	Dissolved Oxygen	1D Conc	6.0	3.5	6/11/2009
June 2009	Dissolved Oxygen	1D Conc	6.0	2.5	6/18/2009
June 2009	Dissolved Oxygen	1D Conc	6.0	2.2	6/25/2009
July 2009	Dissolved Oxygen	1D Conc	6.0	3.5	7/2/2009
July 2009	Dissolved Oxygen	1D Conc	6.0	5.1	7/15/2009
August 2009	Dissolved Oxygen	1D Conc	6.0	5.	8/13/2009
September 2009	Dissolved Oxygen	1D Conc	6.0	5.8	9/3/2009
September 2009	Dissolved Oxygen	1D Conc	6.0	5.4	9/24/2009
October 2009	Nitrogen, Ammonia	30D Conc	1.0	1.85	10/1/2009
October 2009	Nitrogen, Ammonia	7D Conc	1.5	1.85	10/1/2009
October 2009	Dissolved Oxygen	1D Conc	6.0	2.7	10/7/2009
November 2009	Dissolved Oxygen	1D Conc	6.0	5.5	11/5/2009

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Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2009	Total Suspended Solids	30D Conc	12	20.	12/1/2009
December 2009	Total Suspended Solids	7D Conc	18	31.	12/1/2009
December 2009	Dissolved Oxygen	1D Conc	6.0	5.5	12/3/2009

The compliance review of the operating reports show that the St. Mary's Alzheimer center is in Significant Noncompliance (SNC) for dissolved oxygen. In accordance with the NPDES Permit, Windsor House Inc. notifies this office of all violations of the permit within 24-hrs of becoming aware of the violations. A written report of noncompliance is then provided to this office.

In addition to the limit violations noted above, the St. Mary's Alzheimer Center is also in violation of the following rules and regulations.

- 1) Sludge deposits identified in the receiving stream is a violation of Part III.2.A of the NPDES Permit and in violation of Ohio Revised Code 6111.07. In addition, the sludge deposits place the St. Mary's Alzheimer Center in violation of Ohio Administrative Code 3745-1-04(A).
- 2) The St. Mary's Alzheimer Center is currently in significant noncompliance with the compliance schedule in Part I.C of NPDES Permit No. 3PS00011*BD. In accordance with the permit, the St. Mary's Alzheimer Center was to either connect to the Columbiana sanitary sewers or have completed an upgrade to the wastewater treatment plant no later than March 1, 2009. Failure to meet the terms with the compliance schedule places the St. Mary's Alzheimer Center in violation of Ohio Revised Code 6111.07.

Conclusion and Response Requested

The St. Mary's Alzheimer Center is in violation of the NPDES Permit and in violation of OAC 3745-1-04 for discharging sludge to the receiving stream. The plant is also in SNC for violations of the dissolved oxygen limit of the permit and for violations of the compliance schedule in Part I.C of the permit. The Center must come into compliance by either connecting to the Columbiana sanitary sewers or by submitting a permit to install application for upgrading the treatment system. Upgrade of the treatment system shall include, but not be limited to, a trash trap, an equalization tank, new schedule 80 PVC or galvanized piping, new tertiary sand filters and a new disinfection system that will provide a minimum of 15 min. retention time for disinfection.

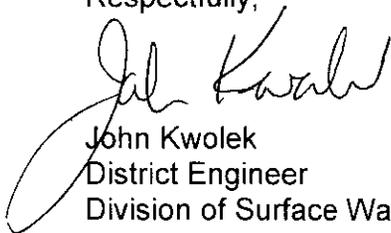
A response to this letter must be submitted to this office explaining the direction the St. Mary's Alzheimer Center will take to address wastewater concerns. The response must explain whether the St. Mary's Alzheimer Center will connect to the Columbiana sewers or upgrade the wastewater treatment plant. The response must include a new schedule to complete the selected option. The response should be provided no later than February 19, 2010.

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Be advised that the St. Mary's Alzheimer Center is in violation of its second NPDES Permit compliance schedule and has ongoing violations of other permit requirements. Failure to resolve these issues in a timely manner and to keep this office updated as to the progress will result in referral of the St. Mary's Alzheimer Center for enforcement action.

You may contact this office at (330) 963-1251 to discuss any questions you may have regarding this inspection report. You may also contact this writer at john.kwolek@epa.state.oh.us

Respectfully,

A handwritten signature in black ink, appearing to read "John Kwolek", is written over the typed name and title.

John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Joe Mansky, Mahoning County Department of Health
Paul Warren, Director Environmental Services, Windsor House Inc.
Greg Brooks, Director of Engineering and Development, Windsor House, Inc.