



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 4, 2008

RE: HIGHLAND BOARD OF EDUCATION  
HINCKLEY ELEMENTARY  
PERMIT NO: 3PT00114  
MEDINA COUNTY

Mr. James Reusch  
Director of Operations  
Highland Board of Education  
3880 Ridge Road  
Medina, OH 44256

Dear Mr. Reusch:

On January 17, 2008, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Gary Loomis, Grounds Keeper. The purpose of the inspection was to evaluate the operation and maintenance of the treatment plant along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The blowers were running and the plant was receiving good aeration.
2. The aeration tank contents appeared to be underloaded. A small amount of foam was also present in the aeration tank.
3. The contents of the aeration tank and the discharge from the sludge return line were both grey. This is due to lack of solids going to the wastewater treatment plant.
4. Both the skimmer and sludge return lines were functioning properly.
5. The surface sand filter beds were free of vegetation.
6. No scum build-up was present behind the baffle in the settling tank. The weir in the settling tank was also free of scum.
7. The discharge from the surface sand filters was clear and appeared to be having no visual impact.
8. Mr. Gary Loomis collects the samples.
9. Lab analysis is performed by the Lodi WWTP.
10. Dissolved oxygen, pH, and temperature analysis are done on site.
11. Suspended solids, BOD, ammonia, and fecal coliform analysis are done by the Lodi WWTP.
12. The sample for BOD is taken prior to the ultraviolet disinfection. All of the other parameters are sampled after the ultraviolet disinfection. The BOD sample should continue to be taken prior to the ultraviolet disinfection during the summer months unless the laboratory seeds the sample prior to running the analysis. Summer is defined as the period from May 1 through October 31.
13. Mr. Gary Loomis and Ms. Debbie Parker are responsible for submitting monthly operating report through Ohio EPA's Surface Water Information Management System (SWIMS). Mr. Loomis was informed that a Web based application for submitting the monthly operating report would be available in the near future. Web addresses are available below which provide information on this topic along with training dates.
14. The plant upgrades were constructed in August 2006. These upgrades were approved through permit-to-install application No. 549422.
15. No sludge has been removed from the plant since the plant was upgraded in August 2006.
16. The water flow is estimated by reading the water meter daily.

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17. The NPDES permit expires on August 31, 2008. The NPDES permit renewal application is required to be submitted to this office no later than 180 days prior to the expiration date.
18. Enclosed is a copy of Ohio EPA's Field Sampling Handbook to assist Mr. Loomis with any sampling questions he may have.

This office has recently reviewed your self-monitoring reports covering the period November 1, 2003, through December 31, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

#### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit Value	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	8/16/2004
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	8/23/2004
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.42	10/1/2004
001	00300	Dissolved Oxygen	1D Conc	6.0	5.8	10/4/2004
001	00400	pH	1D Conc	6.5	6.3	9/15/2005
001	50060	Chlorine, Total Residu	1D Conc	0.019	.09	9/19/2005
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.75	12/1/2005
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	4.75	12/1/2005
001	00530	Total Suspended Solids	7D Conc	18	19.	3/1/2006
001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	5.25	3/1/2006
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	5/8/2006
001	50060	Chlorine, Total Residu	1D Conc	0.019	.21	6/1/2006
001	50060	Chlorine, Total Residu	1D Conc	0.019	.29	6/15/2006
001	50060	Chlorine, Total Residu	1D Conc	0.019	.24	7/5/2006
001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/18/2006
001	00530	Total Suspended Solids	30D Conc	12	19.	9/1/2006
001	00530	Total Suspended Solids	7D Conc	18	19.	9/15/2006
001	00530	Total Suspended Solids	30D Conc	12	73.5	10/1/2006
001	00530	Total Suspended Solids	7D Conc	18	126.	10/1/2006
001	00530	Total Suspended Solids	30D Qty	0.45	.86241	10/1/2006
001	00530	Total Suspended Solids	7D Qty	0.68	1.52611	10/1/2006
001	00530	Total Suspended Solids	7D Conc	18	21.	10/22/2006
001	00530	Total Suspended Solids	30D Conc	12	36.	2/1/2007
001	00530	Total Suspended Solids	7D Conc	18	36.	2/22/2007
001	00530	Total Suspended Solids	30D Conc	12	21.	5/1/2007
001	00530	Total Suspended Solids	7D Conc	18	21.	5/8/2007
001	00530	Total Suspended Solids	30D Conc	12	27.	6/1/2007
001	00530	Total Suspended Solids	7D Conc	18	27.	6/8/2007
001	00530	Total Suspended Solids	30D Conc	12	17.	7/1/2007
001	00530	Total Suspended Solids	30D Conc	12	14.	9/1/2007
001	80082	CBOD 5 day	30D Conc	10	11.	10/1/2007

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### Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
3/15/2004	001	00400	pH	1/Week	1	0
1/8/2006	001	00010	Water Temperature	1/Week	1	0
1/15/2006	001	00010	Water Temperature	1/Week	1	0
1/22/2006	001	00010	Water Temperature	1/Week	1	0
4/30/2007	001	00083	Color, Severity	1/Day	1	0

**This office has no record of receiving the April 2006 monthly operating report. Please submit this monthly operating report electronically within 30 days receipt of this letter.**

Mr. Loomis indicated that he believes the total suspended solids violations are a direct result of the soils disturbed during the construction of the surface sand filter beds migrating through the filter beds. This theory should be confirmed by testing effluent samples before and after the surface sand filter beds. However, it is still the responsibility of the permittee to operate the wastewater treatment plant such that the discharge from the system is in compliance with the facility's NPDES permit.

Please note that Ohio EPA will be converting from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**, sometime in 2008. The new reporting system will be entirely Web based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs). User training is going to be available in early 2008. Please consult the following Web site for updates regarding the specific date:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMRtraining.html>

If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt

enclosure: Ohio EPA Field Sampling Handbook