



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

~~October 30, 2008~~

RE: MEDINA COUNTY  
LITCHFIELD TWP.  
LITCHFIELD ELEMENTARY.  
(9339 BROOKER STREET)  
NPDES # 3PT00099

*Header Manual sub.  
mor data  
11/08-6/09*

CERTIFIED MAIL

Buckeye Local School District  
3024 Columbia Road  
Medina, OH 44256  
Attn: Glen Reisner, Dir. Business Affairs

*Last MOR data  
submitted 5/1/09  
'41'*

Dear Mr. Reisner:

On ~~October 16, 2008~~, a compliance inspection was conducted on the wastewater treatment plant (WWTP) serving the Litchfield Elementary School, located at 9339 Brooker Street, Litchfield Township, Medina County. The purpose of the inspection was to evaluate the WWTP's operation and maintenance condition and compliance with your National Pollutant Discharge Elimination System (NPDES) permit to discharge.

At the time of the inspection, the following observations were made:

- 1) The trash trap was partially full and contained what appeared to be non septic water.
- 2) The flow equalization tank was dry and had no flow entering the tank.
- 3) The aeration tank blowers were operating, and contents of the aeration tank were watery gray. The return sludge line was operating and returning gray water.
- 4) The settling tank contained clear water, and had no discharge. The settling tank effluent trough was clean and dry.
- 5) The pumps in the pump station were tested in the manual mode and were operational.
- 6) The surface sand filters were totally overgrown with vegetation.

*nov period 10/10/08-1/19/11*

*no lim vio  
no code vio  
309-freq vio pt 11  
5/3/09 - no  
more data*

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- 7) The chlorination / dechlorination tank tubes were in the contact tank, and contained dissolved residue from the tablets. The tank was only partially full of clear water, and there was no visible sign of recent discharge.
- 8) The entire school building was boarded up and appeared to be vacant.

A SWIMS computer search of the operating data for the wastewater treatment plant (submittal as required by the NPDES permit to be reported to Ohio EPA) was conducted prior to the inspection. The electronic Discharge Monitoring Report (eDMR) data search covered the period of January 1, 2007, through October 1, 2008. Results of the search found no effluent numerical violations during that time period.

The SWIMS search of the eDMR operating data during the same time period did find the following frequency monitoring / reporting violations:

**LITCHFIELD ELEMENTARY WWTP  
REPORTING FREQUENCY VIOLATION  
NPDES PERMIT NO. 3PT00099  
(Jan. 1, 2007 through Oct. 1, 2008)**

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2007	001	Flow Rate	1/Day	1	0	01/02/2007
January 2007	001	Flow Rate	1/Day	1	0	01/03/2007
January 2007	001	Flow Rate	1/Day	1	0	01/04/2007
January 2007	001	Flow Rate	1/Day	1	0	01/05/2007
January 2007	001	Flow Rate	1/Day	1	0	01/06/2007
January 2007	001	Flow Rate	1/Day	1	0	01/07/2007
January 2007	001	Color, Severity	1/Week	1	0	01/08/2007
January 2007	001	Odor, Severity	1/Week	1	0	01/08/2007
January 2007	001	Turbidity, Severity	1/Week	1	0	01/08/2007
January 2007	001	Flow Rate	1/Day	1	0	01/08/2007
January 2007	001	Flow Rate	1/Day	1	0	01/09/2007
January 2007	001	Flow Rate	1/Day	1	0	01/10/2007
January 2007	001	Flow Rate	1/Day	1	0	01/11/2007
January 2007	001	Flow Rate	1/Day	1	0	01/12/2007
January 2007	001	Flow Rate	1/Day	1	0	01/13/2007
January 2007	001	Flow Rate	1/Day	1	0	01/14/2007
January 2007	001	Flow Rate	1/Day	1	0	01/15/2007
January 2007	001	Color, Severity	1/Week	1	0	01/15/2007
January 2007	001	Odor, Severity	1/Week	1	0	01/15/2007
January 2007	001	Turbidity, Severity	1/Week	1	0	01/15/2007
January 2007	001	Flow Rate	1/Day	1	0	01/16/2007
January 2007	001	Flow Rate	1/Day	1	0	01/17/2007
January 2007	001	Flow Rate	1/Day	1	0	01/18/2007
January 2007	001	Flow Rate	1/Day	1	0	01/19/2007
January 2007	001	Flow Rate	1/Day	1	0	01/20/2007

Reporting Period	Station	Parameter	Sample		Violation Date	
			Frequency	Expected		
September 2008	001	Flow Rate	1/Day	1	0	09/14/2008
September 2008	001	Color, Severity	1/Week	1	0	09/15/2008
September 2008	001	Odor, Severity	1/Week	1	0	09/15/2008
September 2008	001	Turbidity, Severity	1/Week	1	0	09/15/2008
September 2008	001	Flow Rate	1/Day	1	0	09/15/2008
September 2008	001	Flow Rate	1/Day	1	0	09/16/2008
September 2008	001	Flow Rate	1/Day	1	0	09/17/2008
September 2008	001	Flow Rate	1/Day	1	0	09/18/2008
September 2008	001	Flow Rate	1/Day	1	0	09/19/2008
September 2008	001	Flow Rate	1/Day	1	0	09/20/2008
September 2008	001	Flow Rate	1/Day	1	0	09/21/2008
September 2008	001	Color, Severity	1/Week	1	0	09/22/2008
September 2008	001	Odor, Severity	1/Week	1	0	09/22/2008
September 2008	001	Turbidity, Severity	1/Week	1	0	09/22/2008
September 2008	001	Flow Rate	1/Day	1	0	09/22/2008
September 2008	001	Flow Rate	1/Day	1	0	09/23/2008
September 2008	001	Flow Rate	1/Day	1	0	09/24/2008
September 2008	001	Flow Rate	1/Day	1	0	09/25/2008
September 2008	001	Flow Rate	1/Day	1	0	09/26/2008
September 2008	001	Flow Rate	1/Day	1	0	09/27/2008
September 2008	001	Flow Rate	1/Day	1	0	09/28/2008
September 2008	001	Flow Rate	1/Day	1	0	09/29/2008
September 2008	001	Flow Rate	1/Day	1	0	09/30/2008

A file search for the property also found the current NPDES permit expired on December 31, 2006, and a renewal application was to have been submitted to Ohio EPA by June 30, 2006. To date, no NPDES permit renewal application has been submitted to this office.

Please be advised that an effective NPDES permit is required for a discharge of wastewater to waters of the State. Failure to submit a completed application prior to expiration of an NPDES permit results in an unauthorized discharge of pollutants to waters of the State. Such unauthorized discharges are subject to enforcement action pursuant to Ohio Revised Code Chapter 6111. Also be advised that non-reporting of required parameters is a violation of the NPDES permit as well and is subject to enforcement action.

Based upon observations made during the WWTP inspection, it is apparent that the school is permanently closed, and the building is not being utilized for other purposes. It is not understood, however, why the WWTP continues to be aerated, thus wasting money on electricity, when the system is not being utilized for sewage treatment.

If the building is planned for some future use by the school board, or if sale of the building to another owner is being contemplated, then the NPDES permit needs to be

renewed as soon as possible. When reissued, the new NPDES permit will allow the sewage treatment system to be used for the new purpose or owner.

If the building remains vacant, then the renewed permit will 'reserve' the parameter loadings already permitted for discharge by that permit. Should the permit not be renewed, and the permit is allowed to permanently expire, the potential for non renewal may exist, or the Anti-Degradation process may delay issuance of a new permit by 6 or more months.

Please inform this office in writing, within fourteen days of the receipt of this correspondence, as to the status of the property, and what course is desired for renewal of the NPDES permit. If permit renewal is desired, the enclosed NPDES permit renewal application needs to be completed and submitted to this office within 14 days of the receipt of this letter.

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

Respectfully,

**COPY**

Charles E. Allen  
Environmental Engineer  
Division of Surface Water

enclosures

cc: Steve Mazak, Medina County Health Department

File: SP/Medina/LitchfieldTwp/LitchfieldElementary