



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 1, 2010

RE: MEDINA COUNTY
LAFAYETTE TOWNSHIP
CLOVERLEAF SCHOOLS
WWTP INSPECTION & MEETING
(NPDES PERMIT 3PT00069)

Mr. Daryl Kubilus, Superintendent
Cloverleaf School District
8525 Friendsville Rd.
Lodi, OH 44254

Dear Mr. Kubilus:

On December 22, 2009, a meeting was held at the Cloverleaf Middle/Senior High school complex. Present at the meeting were; Messrs. Hank Krouse and Terry Thress, representing the Cloverleaf Schools; Mr. Paul Schmoll, from Thorson Baker & Associates; and this writer, of the Ohio EPA.

The purpose of the meeting was to discuss the addition of the wastewater flow from the proposed Cloverleaf Elementary School, to the existing wastewater treatment plant (WWTP) which currently serves the Middle School. An operation and maintenance evaluation of the WWTPs serving both the Middle School, and the High School, was also conducted.

As was discussed, site prep and construction is currently underway for the new Elementary School, which is to be located on the northeast corner of Friendsville and Buffham Roads. Wastewater generated at the Elementary School, which is estimated to be approximately 18,000 gpd, will be pumped via pump station, to the Middle School WWTP. The existing 20,000 gpd Middle School WWTP presently has the hydraulic capacity to treat the additional flows from the new Elementary School. Additional equipment is also being added to ensure the effluent from the Middle School WWTP will meet its NPDES Permit to discharge limits.

Also discussed during the meeting was the requirement that some form of daily flow measurement will need to be added to the treatment plants and effluent from the lagoon. The NPDES Permit for the facility requires daily flow measurement, and loadings contained in the NPDES Permit are based upon those daily flow rates. One possible form of flow measurement for the WWTPs could be the installation of totalizers on the pump station for each WWTP.

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Detail plans for the Elementary School pump station and forcemain, as well as the improvements to the Middle School WWTP, have been submitted to the Ohio EPA by Mr. Schmoll, and they are currently under review for Permit To Install (PTI) issuance.

At the time of the December 22nd inspection, the following observations were made of the two WWTPs:

Cloverleaf Middle School WWTP

- 1) The trash trap was being utilized and contents were typical.
- 2) The flow equalization chamber and pumps were being utilized and were operating properly.
- 3) The extended aeration tank contents were well aerated, and were a light brown color. The return activated sludge (RAS) line was operational.
- 4) The settling tank contents were typical, and the effluent trough was free of solids.
- 5) Pumps in the surface sand filter dosing station were operational. The pump station has no recording totalizer.
- 6) The surface sand filter sand was clean and raked level.
- 7) Effluent disinfection is accomplished by tablet chlorination units located in the contact tank. The chlorination units contained no tablets, as disinfection of the effluent is not required for the period of November 1st through April 30th.
- 8) Treated effluent from the WWTP is discharged to an on-site lagoon, which has the capability of continuous overflow to Camel Creek.

Cloverleaf High School WWTP

- 1) The trash trap was being utilized and contents were typical.
- 2) The flow equalization chamber and pumps were being utilized and were operating properly.
- 3) The extended aeration tank contents were well aerated, and were medium brown in color. The return activated sludge (RAS) line was operating.

- 4) The settling tank contents were typical and the effluent trough was clean.
- 5) Pumps in the surface sand filter dosing station were operational. The pump station has no recording totalizer.
- 6) The surface sand filter sand was free of solids and snow covered.
- 7) Effluent disinfection is accomplished by tablet chlorination units located in the contact tank. It is noted that disinfection of the effluent is not required for the period of November 1st through April 30th.
- 8) Treated effluent from the WWTP is discharged to an on-site lagoon, which has the capability of continuous overflow to Camel Creek.

At the time of the December 22nd site visit there was no discharge from the lagoon to Camel Creek. Although the lagoon has the capability of continuous discharge, flow from the lagoon is largely dependent upon precipitation events and school activity.

A review of the electronic Discharge Monitoring Reports (eDMR's) submitted to the Ohio EPA for the Cloverleaf Schools WWTP, for the period of January 1, 2008 through January 1, 2010, found the following effluent limit numeric violations for the facility:

**CLOVERLEAF LOCAL SCHOOLS
 MIDDLE & HIGH SCHOOLS
 FINAL EFFLUENT NUMERIC VIOLATIONS
 NPDES PERMIT NO. 3PT00069
 (Jan. 1, 2008 through Jan 1, 2010)**

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2008	602	Dissolved Oxygen	1D Conc	6.0	5.77	6/13/2008
March 2008	602	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	5.025	3/1/2008
March 2008	602	Nitrogen, Ammonia (NH3_N)	7D Conc	4.5	5.8	3/1/2008
August 2009	602	Dissolved Oxygen	1D Conc	6.0	5.94	8/3/2009
August 2009	602	Dissolved Oxygen	1D Conc	6.0	5.68	8/10/2009
August 2009	602	Dissolved Oxygen	1D Conc	6.0	5.	8/17/2009
August 2009	602	Dissolved Oxygen	1D Conc	6.0	5.72	8/24/2009
February 2009	603	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	5.5	2/1/2009
February 2009	603	Nitrogen, Ammonia (NH3-N)	7D Conc	4.5	10.75	2/8/2009
March 2009	602	Nitrogen, Ammonia (NH3-N)	30D Conc	3.0	4.	3/1/2009
July 2009	602	Dissolved Oxygen	1D Conc	6.0	5.92	7/22/2009

Cloverleaf Schools should continue with all efforts that will enable the School WWTPs to consistently meet the facility's NPDES Permit limits. Particular attention should be paid to determination of the cause of effluent violations, and implementation of any necessary corrective actions.

A review of the eDMR's submitted to the Ohio EPA for the Cloverleaf Local Schools WWTPs, for the same period of January 1, 2008 through January 1, 2010, found the following monitoring frequency violations for the facility:

**CLOVERLEAF LOCAL SCHOOLS
 MIDDLE & HIGH SCHOOLS
 NPDES PERMIT NO. 3PT00069
 REPORTING FREQUENCY VIOLATIONS
 (Jan. 1, '08 – Jan. 1, '10)**

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2008	602	31616	Fecal Coliform	1/2months	1	0	01/01/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/01/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/02/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/04/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/05/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/06/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/07/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/09/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/10/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/11/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/12/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/13/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/14/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/16/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/17/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/18/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/19/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/20/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/21/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/23/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/24/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/25/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/26/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/27/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/28/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/29/2008

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Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/30/2008
January 2008	603	01350	Turbidity, Severity	1/Day	1	0	01/31/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/01/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/02/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/03/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/05/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/06/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/07/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/08/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/09/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/10/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/11/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/13/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/14/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/15/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/16/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/17/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/18/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/20/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/21/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/22/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/23/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/24/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/26/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/27/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/28/2008
February 2008	603	00010	Water Temperature	1/Day	1	0	02/29/2008
March 2008	602	31616	Fecal Coliform	1/2months	1	0	03/01/2008
June 2008	001	50060	Chlorine, Total Residual	1/2Weeks	1	0	06/15/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/01/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/02/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/04/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/05/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/06/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/07/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/09/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/10/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/11/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/12/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/13/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/14/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/16/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/17/2008

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2008	603	00010	Water Temperature	1/Day	1	0	09/18/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/19/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/20/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/21/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/23/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/24/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/25/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/26/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/27/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/28/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/29/2008
September 2008	603	00010	Water Temperature	1/Day	1	0	09/30/2008
November 2008	602	31616	Fecal Coliform	1/2months	1	0	11/01/2008
December 2008	602	00010	Water Temperature	1/Week	1	0	12/22/2008
December 2008	602	00400	pH	1/Week	1	0	12/22/2008
December 2008	602	00300	Dissolved Oxygen	1/Week	1	0	12/22/2008
December 2008	603	00400	pH	1/Week	1	0	12/22/2008
December 2008	603	00300	Dissolved Oxygen	1/Week	1	0	12/22/2008
March 2009	602	31616	Fecal Coliform	1/2months	1	0	03/01/2009
March 2009	602	00400	pH	1/Week	1	0	03/08/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/01/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/02/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/03/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/05/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/06/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/07/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/09/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/10/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/11/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/12/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/13/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/14/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/16/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/17/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/18/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/19/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/20/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/21/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/23/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/24/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/25/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/26/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/27/2009

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Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2009	603	00010	Water Temperature	1/Day	1	0	05/28/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/29/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/30/2009
May 2009	603	00010	Water Temperature	1/Day	1	0	05/31/2009

Please review the above (apparent) frequency violations to determine if the parameters were ever measured; measured and not reported; or if they were measured and reported incorrectly in the monthly reports to the Agency. A written explanation of the findings should be submitted to this office within 14 days of the receipt of this correspondence. If the data was collected and either not reported, or was erroneously reported, the eDMR should be amended with correct information.

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

Respectfully,



Charles E. Allen
Environmental Engineer
Division of Surface Water

CEA/mt