



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

July 8, 2008

RE: SUMMIT COUNTY
COPLEY TWP.
COPLEY-FAIRLAWN HIGH SCHOOL
OHIO EPA PERMIT NO. 3PT00047*AD
COMPLIANCE EVALUATION INSPECTION

CERTIFIED MAIL

Mr. Steve Robinson
Copley-Fairlawn City Schools
3797 Ridgewood Road
Copley, OH 44321

Dear Mr. Robinson:

On July 1, 2008, a Compliance Evaluation Inspection (CEI) was conducted at the wastewater treatment plant serving Copley-Fairlawn High School. The purpose of such an inspection is to determine whether the plant is meeting the requirements of its NPDES permit, and to inspect the overall condition of the plant.

The existing wastewater treatment system consists of a 4800 gallon trash trap, a 32,000 gallon surge tank, a 24,000 gpd extended aeration plant with a 4300 gallon clarifier, a dosing station, a 4356 square foot surface sand filter, and a 3170 gallon chlorine contact tank. The plant discharges to Pigeon Creek via an unnamed tributary. The basis of design was 1200 students @ 20 gpd/student for a total of 24,000 gpd. At the time of the inspection, the following observations were made:

1. The surge tank contents were extremely odorous. Is this tank being aerated?
2. The mixed liquor in the aeration tank was a dark brown color, rather than the appropriate chocolate brown color. This indicates that it is time to waste solids from the system.
3. The clarifier was also dark in color, with dark floating solids. The weirs were clogged with solids, and the skimmer did not appear to be working.
4. The surface sand filters were surprisingly clean. Hopefully, the surface sand filters are not being bypassed.
5. The water in the chlorination/dechlorination tank was tea colored, rather than clear. But, there did not appear to be many solids in the tank.

Upon review of the electronic Discharge Monitoring Reports (eDMR's) submitted for the plant from June 1, 2006 through July 1, 2008, the following effluent violations were noted:

Mr. Steve Robinson
 Copley-Fairlawn High School
 July 8, 2008
 Page 2

Numeric Violations

Parameter	Limit Type	Limit	Reported Value	Violation Date
Nitrogen, Ammonia (NH3)	30D Conc	2.0	3.9	10/1/2006
Nitrogen, Ammonia (NH3)	7D Conc	3.0	3.9	#####
Nitrogen, Ammonia (NH3)	30D Conc	4.0	6.3	3/1/2008
Nitrogen, Ammonia (NH3)	7D Conc	6.0	6.3	3/15/2008
CBOD 5 day	30D Conc	10	11.	3/1/2008
Total Suspended Solids	30D Conc	12	14.	5/1/2008
Total Suspended Solids	30D Conc	12	13.	6/1/2007
Nitrogen, Ammonia (NH3)	30D Conc	4.0	6.89	2/1/2008
Nitrogen, Ammonia (NH3)	7D Conc	6.0	6.89	2/22/2008
Total Suspended Solids	30D Conc	12	24.	11/1/2007
Total Suspended Solids	7D Conc	18	24.	#####
Total Suspended Solids	30D Conc	12	16.	10/1/2007
Total Suspended Solids	30D Conc	12	15.	1/1/2008
Nitrogen, Ammonia (NH3)	30D Conc	4.0	13.2	1/1/2008
Nitrogen, Ammonia (NH3)	7D Conc	6.0	13.2	1/22/2008
Nitrogen, Ammonia (NH3)	30D Qty	0.364	.38471	1/1/2008

Frequency Violations

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2006	Flow Rate	1/Day	1	0	06/02/2006
June 2006	Flow Rate	1/Day	1	0	06/03/2006
June 2006	Flow Rate	1/Day	1	0	06/04/2006
June 2006	Flow Rate	1/Day	1	0	06/05/2006
June 2006	Flow Rate	1/Day	1	0	06/06/2006
June 2006	Flow Rate	1/Day	1	0	06/07/2006
June 2006	Flow Rate	1/Day	1	0	06/08/2006
June 2006	Flow Rate	1/Day	1	0	06/09/2006
June 2006	Flow Rate	1/Day	1	0	06/10/2006
June 2006	Flow Rate	1/Day	1	0	06/11/2006
June 2006	Flow Rate	1/Day	1	0	06/12/2006
June 2006	Flow Rate	1/Day	1	0	06/13/2006
June 2006	Flow Rate	1/Day	1	0	06/14/2006
June 2006	Flow Rate	1/Day	1	0	06/15/2006
June 2006	Flow Rate	1/Day	1	0	06/16/2006
June 2006	Flow Rate	1/Day	1	0	06/17/2006
June 2006	Flow Rate	1/Day	1	0	06/18/2006
June 2006	Flow Rate	1/Day	1	0	06/19/2006
June 2006	Flow Rate	1/Day	1	0	06/20/2006

Mr. Steve Robinson
 Copley-Fairlawn High School
 July 8, 2008
 Page 3

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2006	Flow Rate	1/Day	1	0	06/21/2006
June 2006	Flow Rate	1/Day	1	0	06/22/2006
June 2006	Flow Rate	1/Day	1	0	06/23/2006
June 2006	Flow Rate	1/Day	1	0	06/24/2006
June 2006	Flow Rate	1/Day	1	0	06/25/2006
June 2006	Flow Rate	1/Day	1	0	06/26/2006
June 2006	Flow Rate	1/Day	1	0	06/27/2006
June 2006	Flow Rate	1/Day	1	0	06/28/2006
June 2006	Flow Rate	1/Day	1	0	06/29/2006
July 2006	Chlorine, Total Residu	1/2Weeks	1	0	07/01/2006
July 2006	Flow Rate	1/Day	1	0	07/02/2006
July 2006	Flow Rate	1/Day	1	0	07/03/2006
July 2006	Flow Rate	1/Day	1	0	07/04/2006
July 2006	Flow Rate	1/Day	1	0	07/05/2006
July 2006	Flow Rate	1/Day	1	0	07/06/2006
July 2006	Flow Rate	1/Day	1	0	07/07/2006
July 2006	Flow Rate	1/Day	1	0	07/08/2006
July 2006	Flow Rate	1/Day	1	0	07/09/2006
July 2006	Flow Rate	1/Day	1	0	07/10/2006
July 2006	Flow Rate	1/Day	1	0	07/11/2006
July 2006	Flow Rate	1/Day	1	0	07/12/2006
July 2006	Flow Rate	1/Day	1	0	07/13/2006
July 2006	Flow Rate	1/Day	1	0	07/14/2006
July 2006	Flow Rate	1/Day	1	0	07/15/2006
July 2006	Flow Rate	1/Day	1	0	07/16/2006
July 2006	Flow Rate	1/Day	1	0	07/17/2006
July 2006	Flow Rate	1/Day	1	0	07/18/2006
July 2006	Flow Rate	1/Day	1	0	07/19/2006
July 2006	Flow Rate	1/Day	1	0	07/20/2006
July 2006	Flow Rate	1/Day	1	0	07/21/2006
July 2006	Flow Rate	1/Day	1	0	07/22/2006
July 2006	Flow Rate	1/Day	1	0	07/23/2006
July 2006	Flow Rate	1/Day	1	0	07/24/2006
July 2006	Flow Rate	1/Day	1	0	07/25/2006
July 2006	Flow Rate	1/Day	1	0	07/26/2006
July 2006	Flow Rate	1/Day	1	0	07/27/2006
July 2006	Flow Rate	1/Day	1	0	07/28/2006
July 2006	Flow Rate	1/Day	1	0	07/29/2006
July 2006	Flow Rate	1/Day	1	0	07/30/2006
July 2006	Flow Rate	1/Day	1	0	07/31/2006
August 2006	Water Temperature	1/Week	1	0	08/01/2006
August 2006	Chlorine, Total Residu	1/2Weeks	1	0	08/01/2006
August 2006	Dissolved Oxygen	1/Week	1	0	08/01/2006

Mr. Steve Robinson
 Copley-Fairlawn High School
 July 8, 2008
 Page 4

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2006	Flow Rate	1/Day	1	0	08/02/2006
August 2006	Flow Rate	1/Day	1	0	08/03/2006
August 2006	Flow Rate	1/Day	1	0	08/04/2006
August 2006	Flow Rate	1/Day	1	0	08/05/2006
August 2006	Flow Rate	1/Day	1	0	08/06/2006
August 2006	Flow Rate	1/Day	1	0	08/07/2006
August 2006	Water Temperature	1/Week	1	0	08/08/2006
August 2006	Flow Rate	1/Day	1	0	08/08/2006
August 2006	Dissolved Oxygen	1/Week	1	0	08/08/2006
August 2006	Flow Rate	1/Day	1	0	08/09/2006
August 2006	Flow Rate	1/Day	1	0	08/10/2006
August 2006	Flow Rate	1/Day	1	0	08/11/2006
August 2006	Flow Rate	1/Day	1	0	08/12/2006
August 2006	Flow Rate	1/Day	1	0	08/13/2006
August 2006	Flow Rate	1/Day	1	0	08/14/2006
August 2006	Water Temperature	1/Week	1	0	08/15/2006
August 2006	Flow Rate	1/Day	1	0	08/15/2006
August 2006	Chlorine, Total Residu	1/2Weeks	1	0	08/15/2006
August 2006	Dissolved Oxygen	1/Week	1	0	08/15/2006
August 2006	Flow Rate	1/Day	1	0	08/16/2006
August 2006	Flow Rate	1/Day	1	0	08/17/2006
August 2006	Flow Rate	1/Day	1	0	08/18/2006
August 2006	Flow Rate	1/Day	1	0	08/19/2006
August 2006	Flow Rate	1/Day	1	0	08/20/2006
August 2006	Flow Rate	1/Day	1	0	08/21/2006
August 2006	Water Temperature	1/Week	1	0	08/22/2006
August 2006	Flow Rate	1/Day	1	0	08/22/2006
August 2006	Dissolved Oxygen	1/Week	1	0	08/22/2006
August 2006	Flow Rate	1/Day	1	0	08/23/2006
August 2006	Flow Rate	1/Day	1	0	08/24/2006
August 2006	Flow Rate	1/Day	1	0	08/25/2006
August 2006	Flow Rate	1/Day	1	0	08/26/2006
August 2006	Flow Rate	1/Day	1	0	08/27/2006
August 2006	Flow Rate	1/Day	1	0	08/28/2006
August 2006	Flow Rate	1/Day	1	0	08/30/2006
August 2006	Flow Rate	1/Day	1	0	08/31/2006
September 2006	Water Temperature	1/Week	1	0	09/01/2006
September 2006	Flow Rate	1/Day	1	0	09/01/2006
September 2006	Chlorine, Total Residu	1/2Weeks	1	0	09/01/2006
September 2006	Dissolved Oxygen	1/Week	1	0	09/01/2006
September 2006	Flow Rate	1/Day	1	0	09/02/2006
September 2006	Flow Rate	1/Day	1	0	09/03/2006
September 2006	Flow Rate	1/Day	1	0	09/04/2006

Mr. Steve Robinson
 Copley-Fairlawn High School
 July 8, 2008
 Page 5

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2006	Flow Rate	1/Day	1	0	09/05/2006
September 2006	Flow Rate	1/Day	1	0	09/06/2006
September 2006	Flow Rate	1/Day	1	0	09/07/2006
September 2006	Water Temperature	1/Week	1	0	09/08/2006
September 2006	Flow Rate	1/Day	1	0	09/08/2006
September 2006	Dissolved Oxygen	1/Week	1	0	09/08/2006
September 2006	Flow Rate	1/Day	1	0	09/09/2006
September 2006	Flow Rate	1/Day	1	0	09/10/2006
September 2006	Flow Rate	1/Day	1	0	09/11/2006
September 2006	Flow Rate	1/Day	1	0	09/12/2006
September 2006	Flow Rate	1/Day	1	0	09/13/2006
September 2006	Flow Rate	1/Day	1	0	09/14/2006
September 2006	Water Temperature	1/Week	1	0	09/15/2006
September 2006	Flow Rate	1/Day	1	0	09/15/2006
September 2006	Dissolved Oxygen	1/Week	1	0	09/15/2006
September 2006	Flow Rate	1/Day	1	0	09/16/2006
September 2006	Flow Rate	1/Day	1	0	09/17/2006
September 2006	Flow Rate	1/Day	1	0	09/18/2006
September 2006	Flow Rate	1/Day	1	0	09/19/2006
September 2006	Flow Rate	1/Day	1	0	09/20/2006
September 2006	Flow Rate	1/Day	1	0	09/21/2006
September 2006	Flow Rate	1/Day	1	0	09/22/2006
September 2006	Flow Rate	1/Day	1	0	09/23/2006
September 2006	Flow Rate	1/Day	1	0	09/24/2006
October 2006	Water Temperature	1/Week	1	0	10/01/2006
October 2006	Chlorine, Total Residu	1/2Weeks	1	0	10/01/2006
October 2006	Dissolved Oxygen	1/Week	1	0	10/01/2006
October 2006	Water Temperature	1/Week	1	0	10/08/2006
October 2006	Dissolved Oxygen	1/Week	1	0	10/08/2006
October 2006	Water Temperature	1/Week	1	0	10/15/2006
November 2006	Water Temperature	1/Week	1	0	11/01/2006
November 2006	Dissolved Oxygen	1/Week	1	0	11/01/2006
November 2006	Water Temperature	1/Week	1	0	11/15/2006
November 2006	Dissolved Oxygen	1/Week	1	0	11/15/2006
November 2006	Water Temperature	1/Week	1	0	11/22/2006
November 2006	Dissolved Oxygen	1/Week	1	0	11/22/2006
December 2006	Dissolved Oxygen	1/Week	1	0	12/01/2006
December 2006	Water Temperature	1/Week	1	0	12/01/2006
December 2006	Dissolved Oxygen	1/Week	1	0	12/15/2006
December 2006	Water Temperature	1/Week	1	0	12/15/2006
December 2006	Dissolved Oxygen	1/Week	1	0	12/22/2006
December 2006	Water Temperature	1/Week	1	0	12/22/2006
March 2007	Water Temperature	1/Week	1	0	03/22/2007

Mr. Steve Robinson
Copley-Fairlawn High School
July 8, 2008
Page 6

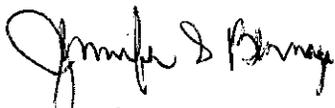
Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2007	Dissolved Oxygen	1/Week	1	0	03/22/2007
June 2007	Chlorine, Total Residu	1/2Weeks	1	0	06/01/2007
August 2007	Chlorine, Total Residu	1/2Weeks	1	0	08/01/2007
September 2007	Chlorine, Total Residu	1/2Weeks	1	0	09/01/2007
September 2007	Dissolved Oxygen	1/Week	1	0	09/01/2007
September 2007	Dissolved Oxygen	1/Week	1	0	09/08/2007
September 2007	Dissolved Oxygen	1/Week	1	0	09/15/2007
October 2007	Chlorine, Total Residu	1/2Weeks	1	0	10/01/2007
October 2007	Chlorine, Total Residu	1/2Weeks	1	0	10/15/2007
March 2008	Dissolved Oxygen	1/Week	1	0	03/01/2008
March 2008	Dissolved Oxygen	1/Week	1	0	03/08/2008
March 2008	Dissolved Oxygen	1/Week	1	0	03/22/2008
May 2008	Chlorine, Total Residu	1/2Weeks	1	0	05/15/2008

Also upon review of the eDMR's, it was noted that the school's reported flow values appear to be extremely low and inconsistent. This office is wondering how the flow is measured, and if there is possibly a problem with the measuring device. Furthermore, our files do not contain non-compliance notifications as required in Part III, Section 12 of your NPDES permit.

Please be advised such instances of noncompliance are subject to enforcement pursuant to ORC 6111.

In conclusion, the wastewater treatment plant appeared to be in poor operation and maintenance condition. It is directed you and your technical operator contact this office by July 14, 2008 to meet at the plant and discuss the problems and possible solutions. If you have any questions, please contact this office at (330) 963-1151.

Sincerely,



Jennifer S. Bennage
Environmental Engineer
Division of Surface Water

JSB/mt

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1. Article Addressed to:
 STEVE ROBINSON
 COPLEY-FAIRLAWN CITY SCHOOLS
 3797 RIDGEWOOD ROAD
 COPLEY OH 44421

2. Article Number **7008 0150 0001 7111 0329 (BENNAGE 7/8/08)**
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 C. H. Bennett Addressee

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