

**Environmental  
Protection Agency**

Tim Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Kerlester, Director

June 23, 2010

RE: Trumbull County  
HUBBARD TOWNSHIP  
ODOT REST AREA 410 WWTP  
I 80 W.B.  
(NPDES PERMIT 3PP00025)  
COMPLIANCE EVALUATION INSPECTION

**CERTIFIED MAIL**

Mr. Paul Oberdorfer, Facilities Manager  
Ohio Department of Transportation  
District 4  
2088 South Arlington Road  
Akron, OH 44306

Dear Mr. Oberdorfer:

On June 9, 2010, a Compliance Evaluation Inspection (CEI) was conducted at the ODOT Rest Area 410 wastewater treatment plant (WWTP). Present during the inspection was Mr. Tim McKenzie, representing ODOT, and this writer, of the Ohio EPA. The purpose of the inspection was to evaluate the operation and maintenance of the facility, prior to renewal of the NPDES permit to discharge.

At the time of the June 9<sup>th</sup> inspection, the operation and maintenance of the plant could be rated as excellent. The following observations were made:

- 1) The trash trap was in use and its contents were typical. According to Mr. McKenzie, the trash trap contents are pumped approximately twice per year.
- 2) The flow equalization chamber and pumps were being utilized and were operating satisfactorily. Contents of the flow equalization tank were at a very low level, and were not being aerated.
- 3) The extended aeration tank was being well aerated, and contents were medium brown in color. The aeration tank contents had a very slight foam on the water surface. The return activated sludge (RAS) line was operational and returning medium brown sludge. Aeration tank blowers are now being run continuously.
- 4) Settling tank contents were typical and the skimmer was properly adjusted and operating, returning clear water. The settling tank effluent trough was free of solids and algae, and the effluent was clear.

- 5) The two upflow clarifiers were both in operation, with no solids buildup on the plastic media. Water above the upflow clarifier media was clear and non turbid.
- 6) The surface sand filter dosing station pumps were operational when tested.
- 7) Two of the 4 surface sand filter cells were in use (northeast and southwest cells). The remaining two cells not in use were clean and free of solids. All cells are normally covered with landscape fabric. However, two of the cells had the fabric removed for replacement.
- 8) The UV effluent disinfection unit was in use and operating normally. The UV Unit contains 4 UV bulbs which are cleaned monthly and are changed 1x/year.
- 9) Treated effluent was clear and visually free of solids.
- 10) The aerated sludge holding tank was in use, and contents were dark brown in color. Sludge is wasted weekly to the aerated sludge holding tank, allowed to settle, and the supernate returned to the flow equalization tank. Sludge is hauled by Speedy Septic approximately once per year, to either the Canton or Alliance municipal WWTP.
- 11) Daily wastewater flow rates are estimated by reading the meter for water entering the building at the rest area. Pumps in the sand filter dosing station have totalizing meters which can be used for readings as a backup alternative. According to Mr. McKenzie, wastewater flow rates to the WWTP have been down this past year. The highest flow seen at the WWTP this past year was in the 6700 gpd range.

A review of the electronic Discharge Monitoring Reports (eDMR's) submitted to the Ohio EPA for the ODOT Rest Area 410 WWTP, for the period of June 1, 2009 through June 1, 2010, found the following effluent limit numeric violations for the facility:

**ODOT REST AREA 410  
NPDES PERMIT NO. 3PP00025  
NUMERIC EFFLUENT VIOLATIONS  
(June 1, 2009 – June 1, 2010)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2009	Total Suspended Solids	7D Conc	18	20	10/1/2009
October 2009	Nitrogen, Ammonia (NH <sub>3</sub> -N)	7D Conc	3.0	3.97	10/8/2009

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A review of the eDMR's submitted to the Ohio EPA for the same period of June 1, 2009 through June 1, 2010, found the majority of the required Color, Odor, or Turbidity information was not reported.

Mr. McKenzie indicated that the Color, Odor, and Turbidity reporting requirements are being reported for those days that he is physically at the WWTP, but there are no other persons authorized to enter the plant to make the observations on the remaining days. Therefore none are being made and reported. Mr. McKenzie did indicate that plans were being made to have someone authorized to make the observations 5 days per week, starting in July 2010.

**Please be advised that the Color, Odor, and Turbidity reporting requirements are not discretionary, but are required by the NPDES Permit for the WWTP. Failure to report these parameters subjects ODOT to enforcement actions the same as if the numerical limits of other parameters were violated.**

ODOT should continue with all efforts that will enable the ODOT Rest Area 410 WWTP to consistently meet its NPDES Permit limits. The monitoring frequency violations must also be satisfactorily addressed as soon as possible.

It is requested that a plan and schedule for addressing the monitoring violations be submitted to this office, in writing, within 10 days of the receipt of this correspondence.

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

pc: Ben Bandy, ODOT/Columbus

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