

**Environmental
Protection Agency**

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

September 14, 2011

RE: TRUMBULL COUNTY
HUBBARD TOWNSHIP
ODOT REST AREA 410 WWTP
1 80 W.B.
NPDES PERMIT NO. 3PP00025
COMPLIANCE EVALUATION INSPECTION

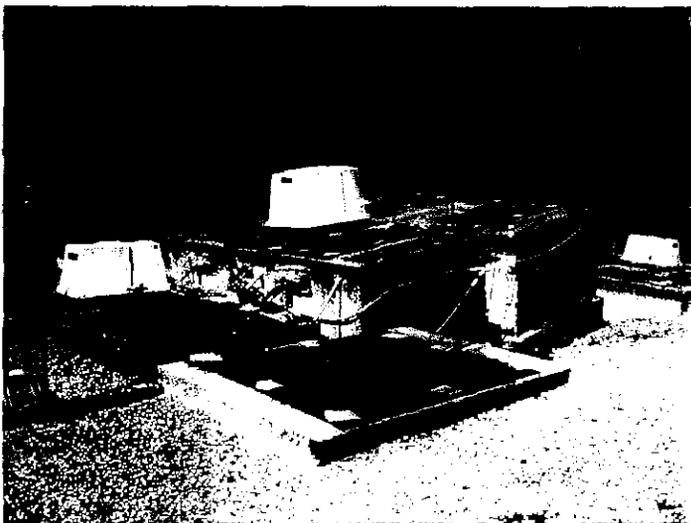
Mr. Paul Oberdorfer
Facilities Manager
Ohio Department of Transportation, District 4
2088 South Arlington Road
Akron, OH 44306

Dear Mr. Oberdorfer:

On August 17, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Ohio Department of Transportation (ODOT) Rest Area 410 Wastewater Treatment Plant (WWTP). Present during the inspection were Mr. Tim McKenzie, representing ODOT, and this writer, of the Ohio Environmental Protection Agency (EPA).

The purpose of the visit was to evaluate the WWTP operation and maintenance, as well the facility's compliance with National Pollutant Discharge Elimination System (NPDES) permit effluent limits and conditions. The last CEI conducted at the ODOT Rest Area 410 facility was on June 9, 2010.

At the time of the August 17th inspection, the rest area was closed, and the WWTP was not in operation. The WWTP was not in operation due to the fact that during rest area closure in the Spring of 2011, the tank was emptied and before it could be refilled, it 'floated' (photo enclosed).



According to Mr. McKinzie, the rest area had been closed for renovations. It was felt that during this time, since no wastewater was being generated, the WWTP could be shut down to save operational costs. To prevent odor problems with a non-aerated tank full of sewage, the tank was pumped of its contents.

Mr. McKinzie stated the tank manufacturer indicated the tanks were supposed to be 'floatproof', based upon anchoring techniques which were used during construction.



However, an excessively wet spring resulted in the upset of the floatproof tanks.

Subsequent to the displacement, inspection of the tanks found structural damage of the concrete which will most likely require replacement of the tanks, to ensure their integrity.

It was estimated that it may cost in excess of \$200,000 to reset the tanks. Due to the excessive repair/replacement cost, consideration is being given by the ODOT administration to running sanitary sewer and water main service to the rest area instead.

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, 2010, through August 1, 2011, found the following effluent limit numeric violation(s) for the facility when it was being operated:

**ODOT REST AREA 410
 NPDES PERMIT NO. 3PP00025
 NUMERIC EFFLUENT VIOLATIONS
 (June 1, 2010 – Aug. 1, 2011)**

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2010	pH	1D Conc	6.5	6.34	10/12/2010

NOTE: A review of the eDMR's submitted to the Ohio EPA for the same period of June 1, 2010, through Aug 1, 2011, found the majority of the required Color, Odor, or Turbidity information was not reported when the WWTP was operating. 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.

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Mr. McKenzie is reporting 'no flow' on monthly eDMRs submitted to the Ohio EPA for the facility.

In the interim, the rest area will remain closed until a decision is made on how the wastewater will be treated.

Once a decision is made on the method of sewage treatment, this office should be informed in writing. If sanitary sewers and water mains are to be extended to the rest area, please be advised that a separate PTI will be required from this Agency for each project.

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/cs

- cc: Ben Bandy, ODOT, Columbus