



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 2, 2009

RE: TRUMBULL COUNTY  
BLOOMFIELD TOWNSHIP  
BLOOMFIELD HIGH SCHOOL  
NPDES PERMIT NO. OH0139238  
OHIO EPA PERMIT NO. 3PT00128\*AD

Mr. Lew Strohm, Superintendent  
Bloomfield-Mespo Local School District  
2077 Park Road West  
North Bloomfield, Ohio 44450

Dear Mr. Strohm:

An inspection was conducted by Mr. Richard Curl of the Trumbull County Health Department and the undersigned of the sanitary wastewater treatment plant serving the Bloomfield High School on June 9, 2009. Also in attendance was Ms. Kerry Kern of your custodial staff. The purpose of the inspection was to evaluate the operational performance of the treatment system as well as to determine the facility's overall compliance with the referenced National Pollutant Discharge Elimination System (NPDES) permit.

**Inspection Findings/Compliance Status**

The current 9,000 gallon/day treatment system consists of an extended aeration activated sludge "package" plant, final settling tank, slow surface sand filtration, and chlorination/ dechlorination.

The above referenced NPDES permit required the facility to install the treatment system improvements authorized by Permit to Install (PTI) No. 551210 in accordance with the following timetable:

Schedule Type	Schedule Milestone	Schedule Due Date
Construction	Begin Construction of System Improvements (i.e. flow EQ, sludge holding tank, dechlorination unit)	10/1/2006
	Complete Construction	12/1/2006

To date, the only improvement that has been completed is the dechlorination unit. As such, your facility is considered to be in **Significant Non-Compliance** with the terms and conditions of the permit.

At the time of the inspection, the following observations, findings, and/or comments were noted:

- All existing treatment units appeared to be in operation. The final effluent being discharged appeared to be of satisfactory visual quality.
- It was indicated that the District has requested federal stimulus money for necessary roof repair work. If approved, some of the funds currently budgeted for the roof work would be available for the treatment system improvements.
- Ms. Kern noted that the exposed non-metallic sheathed (NM) electrical wire in the settling tank is “dead”. To avoid possible mishap in the future, the wire should be removed.
- Please ensure that signed copies of the discharge monitoring reports (DMRs) are on maintained on file at the facility. Additionally, the facility must ensure that detailed analytical reports, including a complete chain of custody record, are received from the laboratory.

A review of the facility's discharge monitoring reports, formerly known as monthly operating reports, received by Ohio EPA for the period, April 2008 – April 2009, indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Monitoring/Reporting Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2008	001	Fecal Coliform	1/Quarter	1	0	08/01/2008
August 2008	001	CBOD 5 day	1/Quarter	1	0	08/01/2008
August 2008	001	Chlorine, Total Residual	1/Quarter	1	0	08/01/2008
August 2008	001	pH	1/Quarter	1	0	08/01/2008
August 2008	001	Dissolved Oxygen	1/Quarter	1	0	08/01/2008
August 2008	001	Total Suspended Solids	1/Quarter	1	0	08/01/2008
August 2008	001	Nitrogen, Ammonia (NH3)	1/Quarter	1	0	08/01/2008

In addition to the above, our review of the facility's data reporting procedures noted that Ms. Lisa Feigle, of Geauga County Laboratory, has been routinely submitting and certifying discharge monitoring reports (DMRs) for the facility using the electronic DMR (e-DMR) internet application. While e-DMR allows permitted facilities to enter, sign, and submit DMRs on the internet, Ms. Feigle does not meet the legal signatory requirement contained in the NPDES permit. Pursuant to Part III of the NPDES permit, DMRs can only be signed and certified by a facility's responsible official or delegated responsible official. Individuals meeting the requirement for a school district would be the principal executive officer, ranking elected official, or other duly authorized employee.

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e-DMR is accessible via the Ohio EPA eBusiness Center. The eBusiness Center is found on the following web page:

<https://ebiz.epa.ohio.gov>

The person authorized to sign and submit DMRs will need to obtain an Ohio eBusiness Center account and Personal Identification Number (PIN). The PIN is an electronic signature of the responsible official. A facility can also have individuals with the privilege to view, create and edit DMRS...but not submit eDMR data. These individuals must have an eBusiness Center account, but do not need a PIN. Since they do not have the privilege of actually submitting the data, the law does not require them to have a PIN (they actually aren't "signing" anything since they don't submit the data). These users are delegated access to the reports by the PIN holder. Once these users perform the data entry or review the data, the DMR is saved and the PIN holder can log on and submit the DMR.

**Summary/Conclusion**

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Should you have any questions or comments regarding this letter, please feel free to contact this office at (330) 963-1196.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mt

cc: Richard Curl, Trumbull County Health Department