



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

May 6, 2008

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, OH 44450

Dear Mr. Strohm:

An inspection was conducted by Mr. Steve Kramer of the Trumbull County Health Department and the undersigned of the sanitary wastewater treatment plant serving the Bloomfield High School on April 10, 2008. Also in attendance was Mr. Randy Ballard 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.

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.
- The inner walls of the surface sand filter need to be sealed. Additionally, the sand must be graded level to ensure uniform distribution. Riprap should be installed around the splash pads to dissipate the energy of the water.
- An exposed non-metallic sheathed (NM) wire was identified leading from the fuse box to the settling tank. Such wiring connections must conform to the requirements of the National Electrical Code.
- The NPDES permit requires that the facility be under the technical supervision of a State-certified Class Operator. No information was readily available to document compliance with this requirement. Ohio Administrative Code (OAC) 3745-7-02 requires that you have a contract with your certified operator. At a minimum, the contract shall specify that the certified operator be available to respond to emergencies and provide the services (i.e. **inspection, monitoring, maintenance, and supervision**) necessary to maintain the reliable operation of the wastewater works. Additionally, an Operator of Record Notification Form must be filed with Ohio EPA.

Ohio EPA has created a Limited Class A certificate for existing owners/operators of small wastewater treatment systems. Class A certification would allow an individual with documented operating experience, like Mr. Ballard, to serve as the Operator of Record for the school. Owners/operators meeting the eligibility requirements contained in Ohio Administrative Code (OAC) 3745-7-08 may apply for the certificate by no later than December 21, 2008.

A review of the facility's discharge monitoring reports, formerly known as monthly operating reports, received by Ohio EPA for the period January 2007 through March 2008 indicate violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are as follows:

Effluent Limitation Violation						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2007	001	Chlorine, Total Residual	1D Conc	0.019	5.	6/28/2007

Monitoring/Reporting Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2007	001	Flow Rate	1/Day	1	0	06/01/2007
June 2007	001	Flow Rate	1/Day	1	0	06/02/2007
June 2007	001	Flow Rate	1/Day	1	0	06/07/2007
July 2007	001	Flow Rate	1/Day	1	0	07/05/2007

Monitoring/Reporting Violations							
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date	
July 2007	001	Flow Rate	1/Day	1	0	07/06/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/07/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/08/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/09/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/11/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/17/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/21/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/22/2007	
July 2007	001	Flow Rate	1/Day	1	0	07/24/2007	
August 2007	001	Total Suspended Solids	1/Quarter	1	0	08/01/2007	
August 2007	001	Nitrogen, Ammonia (NH3	1/Quarter	1	0	08/01/2007	
August 2007	001	Fecal Coliform	1/Quarter	1	0	08/01/2007	
August 2007	001	CBOD 5 day	1/Quarter	1	0	08/01/2007	
August 2007	001	Chlorine, Total Residual	1/Quarter	1	0	08/01/2007	
August 2007	001	pH	1/Quarter	1	0	08/01/2007	
August 2007	001	Dissolved Oxygen	1/Quarter	1	0	08/01/2007	

In addition to the above, our review of the facility's data reporting procedures noted the following:

1. We understand that Geauga County Laboratory has been routinely submitting discharge monitoring reports for the facility. Pursuant to Part III of the NPDES permit, all reports submitted to Ohio EPA shall be signed and certified in accordance with the requirements of 40 CFR 122.22. As such, reports can only be signed and certified by a principal executive officer or ranking elected officer of the school district or by a duly authorized representative of said individual. Pursuant to 40 CFR 122.22 (b):

A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described in paragraph (a) of this section;***
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,***

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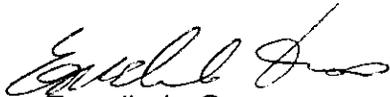
(3) The written authorization is submitted to the Director.

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

Enclosure: ORC Form

cc: Steve Kramer, Trumbull County Health Department