



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

February 13, 2012

RE: ODOT COLEBROOK 04-42 REST AREA
NPDES PERMIT NO. 3PP00016
COLEBROOK TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Thomas Wathen
Head of Building Maintenance
Ohio Department of Transportation
2088 S. Arlington Rd.
Akron, Ohio 44306

Dear Mr. Wathen:

On February 10, 2012, a site inspection was conducted at the above referenced facility on the west side of State Route 11 south of U.S. 6, Colebrook Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Robert Gomez and Doug Jerry represented Winelco, Inc., contract operator to the Ohio Department of Transportation (ODOT). The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on March 17, 2011.

The system consists of a trash trap, extended aeration tanks, clarifiers, fixed media filters, dosing tank, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management of sludge removal from the sludge tanks when needed to another publicly owned treatment works (POTW). The facility discharges to an unnamed tributary to Mosquito Creek adjacent to the west side of the facility. No backup power is provided to the facility, but the facility is provided with alarms.

Observations

Following are observations made during the inspection:

1. The design flow of the extended aeration plant is 10,000 gallons per day, although the plant is not receiving anywhere near that flow. The plant operates continuously.
2. The plant was operated by David Park, who also operated the Dorset Outpost and the Rome Outpost WWTPs on behalf of ODOT through January 31, 2012. The plant is currently operated by Doug Jerry of Winelco Inc. under contract as of February 1, 2012 on behalf of ODOT. Mr. Park is currently listed as the Operator of Record (ORC) of this facility.
3. Log books and the operation and maintenance manual are maintained at the site by the current operator, Winelco, and were available for inspection. Loose sheets were maintained in a 3-ring notebook by ODOT prior February 1, 2012, but were not available at the time of the inspection. Therefore, the only available log book records activities since February 1, 2012. The plant is currently seen once a week. When the permit is renewed for this facility, the plant will need to be seen a minimum of twice weekly for a total of one hour weekly per OAC 3745-7-02.

4. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash is typically pumped out every four to six months and containerized for disposal at a solid waste landfill.
5. The flow equalization tank pumps were cycled and found in operable condition.
6. The content of the aeration tank had a medium color, no odor, and good mixing. Sludge returns were a medium brown color with minimal foaming. The blowers were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The surface of the clarifier was clear. The skimmers were found in operating condition. Effluent channels were clean and Mr. Jerry indicated that channels were scraped down weekly. The foam spray system was inspected and found not operating.
8. The fixed media filters were inspected and appeared to be in operating condition, producing a clear effluent.
9. Surface sand filter dosing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
10. Surface sand filters were found reasonably free of vegetation. A small amount of leaf litter was noted, typical for late winter. The east bed did not have elbows installed, and significant erosion of the sand was noted. The bed needs to be raked and elbows installed, and rip-rap around the dissipation pad is recommended. The west bed was disassembled and needs repair. The effluent discharged to the sand filter during the inspection was clear and free of color and turbidity. The wastewater percolated freely through the sand indicating that the beds were not clogged.
11. The final effluent was observed at the outlet of the chlorine contact tank and found to be clear but dark. The source of the color should be investigated and corrected. The blue outfall signage labeled "treated wastewater outfall" does contain the outfall number, NPDES permit, or NPDES permit holder as specified in your NPDES permit.
12. The sludge holding tank was being aerated. Previous discussions with Mr. Parks indicated that sludge is normally removed and hauled to another POTW approximately twice per year.
13. Prior February 1, 2012, samples are collected by Mr. Parks. Mr. Parks performed on-site analysis of pH and DO, and recorded the visual observations of odor, color, turbidity, and flow prior to February 1, 2012. Since February 1, 2012, samples are collected by Mr. Jerry. Mr. Jerry performs on-site analysis of pH and DO, and also records the visual observations of odor, color, turbidity, since February 1, 2012.
14. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples
15. Prior to February 1, 2012, Mr. Parks submitted the data to Ohio EPA's electronic Discharge Monitoring Report (e-DMR) system. Mr. Parks plans to submit the January 2012 data into

the eDMR system within the next two weeks. Commencing with the February 2012 data, Mr. Gomez indicated that David Leverage of Winelco anticipates submitting the data to Ohio EPA's e-DMR system on behalf of ODOT.

16. Electrical outages have occurred in the past which caused plant upsets. Prior to February 1, 2012, damage to equipment was minimized by shutting down the entire plant if partial power is lost to the facility, and the plant manually restarted following a power outage. This information was apparently not shared with the current operator. Currently, no backup generator is present on the site.

NPDES Permit Compliance Review

A review of the eDMRs received by Ohio EPA for the period February 1, 2011 through January 1, 2012 indicates noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance noted are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|--------------------------|------------|-------|----------------|----------------|
| 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 26.5 | 3/1/2011 |
| 001 | 00610 | Nitrogen, Ammonia (NH3) | 30D Conc | 3.0 | 4.01 | 3/1/2011 |
| 001 | 00530 | Total Suspended Solids | 7D Conc | 18 | 26.5 | 3/8/2011 |
| 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 14.5 | 6/1/2011 |
| 001 | 50060 | Chlorine, Total Residual | 1D Conc | 0.019 | 3.6 | 6/2/2011 |
| 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 18.5 | 8/1/2011 |
| 001 | 00530 | Total Suspended Solids | 7D Conc | 18 | 18.5 | 8/1/2011 |
| 001 | 50060 | Chlorine, Total Residual | 1D Conc | 0.019 | 2.2 | 8/10/2011 |
| 001 | 50060 | Chlorine, Total Residual | 1D Conc | 0.019 | 2.2 | 8/17/2011 |
| 001 | 50060 | Chlorine, Total Residual | 1D Conc | 0.019 | 1.1 | 8/29/2011 |

Ohio EPA notes that the above referenced nitrogen-ammonia and chlorine residual violations placed ODOT in significant noncompliance (SNC), and Ohio EPA notified you of this via letters on August 5, 2010 and October 24, 2011. The facility currently remains in SNC for suspended solids and ammonia-nitrogen. To-date no response has been received to the SNC letters or inspection letters. A written explanation as to why the above limit violations occurred must be provided along with measures to ensure that they are not repeated.

Reporting Violations

No reporting frequency violations were noted for the period reviewed, however the following reporting code violation is noted:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|----------------|------------|-------|----------------|----------------|
| 001 | 31616 | Fecal Coliform | | | AJ | 8/1/2011 |

The code indicates that it is beyond range and should only be used for an automatic analyzer. ODOT should check with the laboratory to see if the reporting code was provided in error, and amend the eDMR as appropriate. A written explanation as to why the above reporting code violation occurred must be provided along with measures to ensure that it is not repeated.

Compliance Schedule

Ohio EPA notes the following regarding your compliance schedule contained within your NPDES permit:

| Permit Effective Date | Permit Expiration Date | Schedule Due Date | Completion Date | Event Code | Schedule Type | Schedule Milestone |
|-----------------------|------------------------|-------------------|-----------------|------------|---------------|----------------------------|
| 10/1/2010 | 9/30/2015 | 10/01/2011 | | 95999 | Other | E. Coli Status Report |
| 10/1/2010 | 9/30/2015 | 11/01/2011 | | ----- | Other | Disinfection PTI If Needed |
| 10/1/2010 | 9/30/2015 | 12/01/2011 | | 95999 | Other | E. Coli Status Report |
| 10/1/2010 | 9/30/2015 | 03/01/2012 | | 05699 | Other | Operational Level Attained |

As the October through December 2011 milestones have passed and no report was provided, ODOT is in violation for not submitting the required information and submit a permit-to-install (PTI) if needed. A written explanation as to why the above milestones have been missed must be provided along with measures to ensure that they are not repeated.

Other Violations

1. Failure to Designate appropriate Operator of Record: - Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by OAC 3745-7-02. Ohio EPA understands that as of February 1, 2012, Mr. Parks is no longer the ORC for this facility. Pursuant to Ohio Administrative Code (OAC) 3745-7-02(A)(1)(b), ODOT was required to notify Ohio EPA of a change in the ORC within three days of such a change on the prescribed form. No official designation has been received by Ohio EPA, Central Office, for the change in the ORC. Ohio EPA's operator of record designation forms may be found online at http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf. Please complete the operator of record form and return to Ohio EPA Central Office for your current operator of record. Please provide this office with a courtesy copy of the ORC form in replying to this letter. Ohio EPA understands that Mr. Jerry is operating in a temporary capacity and that Winelco is currently seeking a permanent operator. Once a new operator is chosen, another ORC form will need to be completed and submitted.
2. Failure to Maintain a Facility Log Book: The inspection revealed that records required pursuant to OAC 3745-7-09(A)(3) prior to February 1, 2012 are not being maintained at the facility and were not available for inspection as required by rule. Subsequent discussions with Mr. Parks following this inspection indicate that this information will be provided. A log book must be maintained at the wastewater treatment plant (WWTP) and available for inspection 24 hours a day. This is typically accomplished by posting a mailbox or some other weather-tight container at the WWTP.

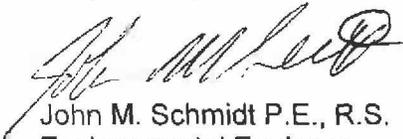
3. Minimum Staffing Requirements: Based upon a lack of a log book to document visits by your ORC prior to February 1, 2012, ODOT is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements. The facility must have adequate documentation that they meet the minimum staffing requirements of OAC 3745-7-04(C).
4. Outfall Signage: Part II, Item I of your NPDES permit requires ODOT to post outfall signage. While signage was posted, it does not meet the requirements specified in Part II, Item I. The outfall signage must meet the specifications prescribed by Part II, Item I of your NPDES permit.

Comment

Based upon the inspection findings and discussions with plant personnel, Ohio EPA recommends that ODOT consider backup generators for this facility.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

cc: Robert Gomez, Winelco, Inc.
Dave Park, ODOT, Seven Hills Garage

File: SP/Ashtabula/Colebrook Twp./ODOT Colebrook Rest Area 04-42 (3PP00016)