



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

February 13, 2012

RE: ODOT DORSET MAINTENANCE OUTPOST  
NPDES PERMIT NO. 3PP00041  
DORSET TOWNSHIP, ASHTABULA COUNTY  
COMPLIANCE INSPECTION EVALUATION

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 at 3225 State Route 193, Dorset Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Robert Gomez 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, clarification, 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 Mill Creek adjacent to the north 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 1000 gallons per day, although the plant is not receiving anywhere near that flow. The plant operates on a timer for a few hours in the morning and few hours in the afternoon when the plant receives flow.
2. The plant was operated by David Park, who also operated the Dorset Outpost and the Rome Outpost wastewater treatment plant (WWTP) 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.
4. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash was containerized for disposal at a solid waste landfill.

5. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash was containerized for disposal at a solid waste landfill.
6. The plant tank top elevations are the same as the surrounding ground within the drainage area of the building and parking area, diverting storm water and snow melt into the tanks. This is not acceptable and places an undue hydraulic burden on the WWTP. The tanks must have a riser or other means of diverting storm water from draining into the tops of the tanks through the grating. This was noted during the 2011 inspection and remains unaddressed.
7. The content of the aeration tank had a light grey color, slight septic odor, and moderate air. Sludge returns were a light grey to clear color with minimal foaming. The blowers were cycled and found in operating condition; however the check valve to the south blower was noted as failed. Mr. Gomez that he would be addressing this issue today. The alarms were tested and found in operating condition.
8. The surface of the clarifier was clear. Skimmers were in operating condition. The plant was turned on for purposes of the inspection. Effluent weirs and channels were clean.
9. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found not working. Mr. Gomez will investigate the non-working alarm.
10. Surface sand filters were inspected, with the east bed noted as containing some vegetation that must be removed, and the splash pad of the west bed noted in deteriorated condition. Consideration should be given to adding rip-rap to the splash pad to aid in controlling erosion in the bed. 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 of acceptable visual quality. The final discharge was observed in acceptable visual quality in the manhole on ODOT's property prior to the final outfall. The final discharge at Mill Creek could not be observed as it is located on private property. 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. 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.
13. Cardinal Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples
14. 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.
15. The facility also installed a 500-gallon oil/water separator and a 6,000-gallon holding tank for the vehicle maintenance building.

16. Materials from the holding tank are removed for off-site solidification and disposal at a municipal solid waste landfill. Liquids were last removed in July 2010. Liquids are hauled by a contracted licensed waste hauler.
17. Two 1,000-gallon fuel tanks (one gasoline, one diesel) are located on the property. These tanks are double walled and sit on a concrete pad. Evidence of spills were observed during the inspection.
18. Two single walled brine tanks are located on the property for making a deicing solution. Containment berms appear to be constructed out of gravel, which will do little to contain the brine should a spill, leak, or rupture occur. The containment berms must be reconstructed out of a less permeable material such as clay or lined with a flexible membrane liner.

**NPDES Permit Compliance Review**

A review of the eDMRs received by Ohio EPA for the period February 1, 2011 through January 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance 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	50060	Chlorine, Total Residual	1D Conc	0.019	.596	6/2/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	.9	6/2/2011
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.76	8/1/2011
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	3.76	8/1/2011
001	31616	Fecal Coliform	30D Conc	1000	1326.64	8/1/2011
001	31616	Fecal Coliform	7D Conc	2000	8800.	8/15/2011

The June 2011 violations were discussed via a notification dated July 29, 2011. In previous inspections, Mr. Parks acknowledged that ammonia discharge levels are an ongoing problem due to low strength wastewater. Mr. Parks indicated that ODOT is open to any recommendations for a low-cost workable solution to the ammonia problem. Ohio EPA DSW, Compliance Assistance Unit (CAU), may be able to assist you in this matter. Please feel free to contact Keith Kroeger at (614) 644-2001 or via e-mail at [Keith.Kroeger@epa.state.oh.us](mailto:Keith.Kroeger@epa.state.oh.us) if you would like assistance from Ohio EPA, DSW, CAU. The bacteria violation in August 2011 is a serious issue. 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
001	31648	E. coli			AJ	8/1/2011

The AJ 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 violations occurred must be provided along with measures to ensure that they are 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	04/01/2012		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.

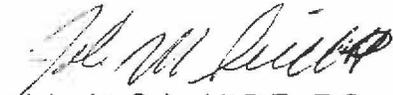
Other Violations

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 Ohio Administrative Code (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 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 ORC designation forms may be found online at [http://epa.ohio.gov/portals/35/opcert/Operator\\_of\\_Record\\_Notification\\_Form.pdf](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 indicates that this information will be provided. A log book must be maintained at the 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 be staffed by a licensed operator twice weekly for a total of an hour.
4. Outfall Signage: Part II, Item M 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 M. The outfall signage must meet the specifications prescribed by Part II, Item M of your NPDES permit.

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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/Dorset Twp./ODOT Dorset Outpost (3PP00041)