



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 15, 2012

RE: WINDSOR COMMUNITY CENTER
NPDES PERMIT NO. 3PT00074
WINDSOR TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. James E. Plizga, Chairman
Mr. Jeffrey Merritt
Mr. Robert Slusher
Windsor Township Trustees
P.O. Box 223
5430 U.S. Route 322
Windsor, OH 44099

Dear Mr. Plizga:

On March 15, 2012, a site inspection was conducted at the above referenced facility at 5340 U.S. Route 322, Windsor Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. 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 3, 2011.

The system consists of a trash trap, equalization tank, extended aeration tank, clarification, dosing tank, surface sand filtration, chlorine disinfection, dechlorination, and post-disinfection aeration. Sludge management of sludge removal from an aerated sludge tank when needed to another POTW. The facility discharges to an unnamed tributary to Phelps Creek adjacent to the east side of the facility. No backup power is provided to the facility.

Observations and Notations

Following are observations and notations were made during the inspection:

1. The inspection was conducted in two parts. For the morning inspection, Windsor Twp. was suffering a power outage that started at approximately 7:15 AM. The site was re-inspected in the afternoon once power was returned.
2. The design flow of the extended aeration plant is 2340 gallons per day, based upon when the building operated as an elementary school. Currently the building serves as the township offices and has rooms rented out for a church congregation, evening sports activities, and occasionally for other events. Based on current operations, the plant is not receiving anywhere near that flow, and on most days does not discharge.
3. The pumps serving the equalization basin were cycled and found in operating condition. The alarms were also found in operating condition.

4. The trash trap was inspected and the contents were typical. The trash trap should be inspected monthly and materials removed as necessary. Collected materials should be disposed of at a landfill as you currently do for the cleanouts from the sand filters.
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 content of the aeration tank had a light color and good mixing. The blowers were running and the plant was receiving good aeration. Sludge returns were a light brown color with minimal foaming. The color is typical for a plant that is biologically under-loaded. A medium brown color is more typical for the aeration tank and sludge return lines of a properly operating plant.
7. The surface of the clarifier was clear. Effluent channels were clean.
8. The sand filter dosing pumps did not operate when placed into the "hand" position. The alarms were tested and found not be in operating condition. The source of the malfunctioning dosing pumps and inoperable alarms should be investigated.
9. Surface sand filters were reasonably clean and operable.
10. The final discharge at the tributary to Phelps Creek was observed and found to be dry.
11. Ohio EPA has no records of annual reports for sludge handling. It has been several years since sludge has been removed from this facility. Sludge should be removed from the facility at least bi-annually or more frequently based upon sludge generation rates.
12. Samples are collected by Mr. Plizga. Mr. Plizga performs on-site observations of temperature, flow, color, and severity.
13. Valley Environmental provides the sample bottles and preservatives and performs laboratory analysis of collected samples. Valley Environmental submits the quarterly data to Ohio EPA's electronic discharge monitoring report (eDMR) system.
14. Mr. Plizga submits the daily and monthly visual observation data to Ohio EPA's eDMR system.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period February 1, 2011 through February 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

Effluent Limit Violations

The following effluent limit violations were noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	30D Conc	1000	2100.	6/1/2011
001	31616	Fecal Coliform	7D Conc	2000	2100.	6/1/2011

A written explanation as to why this event occurred must be provided, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting code or reporting frequency violations were reported for the time period reviewed.

Other Violations

The following additional NPDES permit violations are noted:

1. Failure to Submit Annual Sludge Report: Ohio EPA notes that Part II, Item I of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year. The report is required even if no sludge was removed the previous calendar year. Ohio EPA's files reflect that the Windsor Twp., Trustees have not submitted this report for 2010 or 2011. Please submit the report to Chris Moody of this office as prescribed by your NPDES permit.
2. Facility Log Book: The inspection revealed that records required pursuant to Ohio Administrative Code (OAC) 3745-7-09(A)(3) are not being maintained at the facility in a manner available for inspection as required by rule. The records must be accessible onsite for twenty-four hour inspection by agency or emergency response personnel as prescribed by OAC 3745-7-9(A)(2). The facility Owner and Operator are both responsible to make sure that the log book is available and maintained on site for 24-hour access by Ohio EPA and emergency response personnel. The log must include inspection dates with time in and time out, clearly identify who is logging time at the facility, and list all activities being performed during the visit. In addition to the log book, a copy of the contract with your ORC must be maintained at the site. Based upon a lack of a log book to document visits by your ORC, Windsor Township Trustees is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements, OAC 3745-7-09 for not maintaining a facility log book, and OAC 3745-33 for not meeting permit conditions, specifically Part II, Item A that requires that this facility be overseen by an ORC.

Compliance Schedule

Your permit, effective September 1, 2010, as modified on April 1, 2011, contains the following milestones:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
9/1/2010	8/31/2015	3/1/2011	4/6/2011	95999	Other	Status Report
9/1/2010	8/31/2015	9/1/2011	4/6/2011	5699	Construction	Final Compliance w/ Eff Limits
7/1/2011	8/31/2015	9/1/2011	9/1/2011	95999	Other	Status Report
7/1/2011	8/31/2015	11/1/2011	8/1/2011	1699	Construction	Final Plan Approved

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As these milestones have been completed prior to the last inspection, no additional information is needed on the compliance schedule.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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: File SP/Ashtabula/Windsor Twp./Windsor Community Center(3PT00074)