



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 20, 2012

RE: ASHTABULA – COFFEE CREEK WWTP
AUSTINBURG TWP., ASHTABULA CO.
OHIO EPA PERMIT 3PG00145
COMPLIANCE EVALUATION INSPECTION

Mr. Lawrence J. Meaney, Director
Ashtabula County Department of Environmental Services
36 West Walnut Avenue
Jefferson, OH 44047

Dear Mr. Meaney:

On March 19, 2012, a site inspection was conducted at the above referenced facility at 2949 Industrial Park Drive, Austinburg Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Mark Verzella represented Ashtabula County Department of Environmental Services (ACDES). 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 10, 2011.

The system consists of screening grit removal, lift station, comminutor, equalization basin, aeration tanks, clarification, rapid sand filtration, UV disinfection, and post disinfection aeration. Sludge management consists of sludge holding tanks, aerobic digestion and settling tanks. Sludge handling includes sludge tanks and belt filter press, with provisions for drying on sludge drying beds. Pressed sludge placed into a covered dumpster or stockpiled on a concrete pad for off-site disposal at a solid waste disposal facility. The facility discharges to Coffee Creek adjacent to the north side of the facility. Generators provide backup power to the entire facility.

Observations

Following are observations made during the inspection:

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept.
2. The plant is operated by Larry Seberino, who also operates the Meadowood Allotment WWTP on behalf of ACDES.
3. EQ basin blowers were replaced in March 2011. High level floats were added to the EQ basin.

4. An existing bar screen at the facility is no longer used, except on an emergency basis. Screenings and grit was containerized for disposal at a solid waste landfill.
5. The influent sampler is maintained at the proper temperature and collects a time proportional sample.
6. Aeration blowers were replaced in August 2011. The content of the aeration tank had good color and mixing. Sludge returns were not in use, as the system was settling for wasting. Poly alum chloride is added for phosphorus control.
7. The surface of the clarifier was clear. The effluent trough was clean and there was no scum around the effluent baffle or the trough. The effluent baffle and troughs are scrubbed weekly.
8. The sand filter surfaces were reasonably clean. 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. The plant has the capability of bypassing plant wastewater around the filters during periods of heavy hydraulic loading. Caustic soda can be added for pH control.
9. The UV system was not in use as it was outside the disinfection season of May through October.
10. The final effluent sampler is maintained at the proper temperature and collects a flow proportional sample.
11. ACDES maintains a trailer mounted belt filter press, but now uses it exclusively at the Coffee Creek WWTP. Sludge wasted from the aeration system is maintained in aerobic digesters, converted from the old plant aeration tanks. Polymer is added to aid in pressing. Sludge is removed for disposal at a landfill, although the permit contains provisions for hauling to another publicly owned treatment works (POTW). There are provisions for both sludge dewatering and storage in existing sludge drying beds.
12. The WWTP laboratory performs monitoring of pH, temperature, dissolved oxygen, and screening only for ammonia-nitrogen. ACDES contracts with Microbac Laboratories of Meadville, PA remaining parameters and quality assurance samples from the WWTP laboratory.
13. Log books and the operation and maintenance manual are maintained at the site and were available for inspection.
14. The final effluent was clear as inspected in the manhole just prior to the final discharge. The final discharge at the creek was not inspected due to slippery slopes.

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:

Limit Violations

No effluent violations are noted for the time period reviewed.

Reporting Violations

No reporting frequency violations were noted for the time period reviewed; however, the following reporting code violations are noted:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	80082	CBOD 5 day			AB	9/16/2011
601	80082	CBOD 5 day			AB	9/16/2011

ACDES notified Ohio EPA that due to a failing air conditioner, the results from the September 16, 2011 CBOD tests were biased. As a reasonable explanation was provided, no additional information is needed to respond to the violation.

Other Violations

Composite Sampling: Part II, Item F of your permit requires all composite samples to be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the sewage flow rate at the time of sampling. ACDES has advised Ohio EPA that its influent sampler collects samples on a time-proportional basis instead of flow proportional. All composite samples must be flow-proportionate.

Compliance Schedule

Your new permit, effective January 1, 2011, contains the following milestones:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
1/1/2011	12/31/2015	11/1/2011	11/30/2011	95999	Other	E. Coli Status Report
1/1/2011	12/31/2015	11/1/2011	N/A	---	Other	Submit PTI if Needed
1/1/2011	12/31/2015	1/1/2012	11/30/2011	05699	Other	Achieve Final Limit for E Coli

Although all milestones were met, the E. Coli status report was not received by the date prescribed in our permit. ACDES is reminded of its obligations to submit required information by the assigned milestones as prescribed by your NPDES permit.

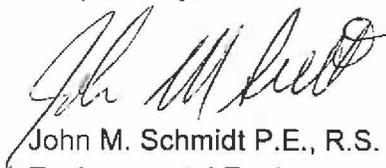
Comment

During our visit, we discussed that the plant was occasionally adversely affected in 2010 by discharges from a Sav-a-Lot warehouse when they discharge outdated milk or juice into the collection system, affecting the plant MLVSS values. No issues were noted in 2011. Communication with this facility is paramount in allowing operators to adjust to this by diverting the high-strength waste into the equalization basin or taking other measures. With the connection of sanitary sewers anticipated soon, the ability of WWTP to divert waste flows to the equalization basin may be more difficult to achieve. As you know, any discharge that has the potential to adversely affect WWTP operations could warrant the placement of Sav-a-Lot on an indirect discharge permit (IDP) as ACDES does not have an industrial pretreatment program. From examination of Ohio EPA's files, ACDES made an inquiry via letter on July 23, 2008. From my discussions with Donna Kniss of this office, she discussed this with Barry French of your office and discussed several options, including requesting Sav-a-Lot be placed on an IDP. At that time, ACDES did not wish to pursue having Ohio EPA request that Sav-a-Lot be placed on an IDP.

As stated in the 2010 inspection, if ACDES wishes to have Ohio EPA consider Sav-a-Lot for an IDP for its high strength waste discharges, ACDES must specifically request this in writing from Ohio EPA. The request must include a rationale of why Sav-a-Lot should be requested to submit an IDP application. Your rationale should include any records of adverse impacts or operation problems at the Coffee Creek WWTP apparently attributed to high strength discharges from Sav-a-Lot.

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: Donna Kniss, Ohio EPA, DSW, NEDO

File: Municipal/ASH Coffee Creek WWTP (Ashtabula Co.)/PC