



**Environmental
Protection Agency**

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

May 1, 2012

RE: ASHTABULA COUNTY JV SCHOOL
OHIO EPA PERMIT 3PT00029
JEFFERSON TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Keith Biber, Business Manager
Ashtabula County Technical and Career Campus
1565 State Route 167
Jefferson, Ohio 44047

Dear Mr. Biber:

On April 26, 2012, a site inspection was conducted at the above referenced facility at 1565 State Route 167, Jefferson Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, with Mr. Rick Stuart representing the Ashtabula County Technical and Career Campus (ACTCC), formerly known as the Ashtabula County Joint Vocational School and Mr. Roger Osborn representing Lewis Wastewater Management, your operator, during the inspection. 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 31, 2011 and November 1, 2011.

The system consists of a trash trap, equalization tank and extended aeration system with clarifier, wet well/lift station, dosing chamber, surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another publicly owned treatment works (POTW). The facility discharges to a manhole adjacent to the facility, where it joins runoff from the parking lot. Ultimate discharge is through a series of manholes to Mill Creek adjacent to the east side of Garrett Road and east of the facility. No backup power is provided to the facility, and the facility is provided with alarms.

Observations

The following observations were made during the inspection:

1. The plant is operated by Roger Osborn (Dustin Lewis backup) of Lewis Wastewater Management on behalf of ACTCC. Mr. Lewis is listed as the operator of record for this facility. Mr. Rick Stuart of the ACTCC performs daily operations at the wastewater treatment plant (WWTP) with oversight by Mr. Osborn.
2. Log books and the operation and maintenance manual are maintained at the site and were available for inspection. The log book contained the information required by Ohio Administrative Code (OAC) 3745-7-09.

3. The overall condition of the treatment plant during this inspection was satisfactory with the plant well maintained. Collected trash was containerized for disposal at a solid waste landfill.
4. The content of the aeration tank had a slight earthy odor, chocolate brown color with good mixing. A leak was noted in an air line that should be repaired as soon as possible. The blowers were running and the plant was receiving sufficient aeration. The return activated sludge (RAS) lines were noted as functioning. Blowers were cycled and found to be operating properly. This is an indicator of a properly operating aeration system.
5. The surface of the clarifier was reasonably clear with scum directed to the skimmer. Effluent channels and weirs were in acceptable condition. Both the sludge return lines and skimmer were operating properly at the time of the inspection.
6. Surface sand filter doing pumps were cycled and found in operating condition. The alarms were tested and found in operating condition.
7. The East Surface sand filter was found operating with a significant accumulation of vegetation that must be removed. The west bed was found reasonably clean and operable. 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.
8. Chlorination and dechlorination systems were installed, but not operating at the time of the inspection. The systems are not required to be operating at the time of the inspection as it was outside the disinfection season. The system must be in full operation by May 1, 2012. The plant effluent running through the disinfection tank was noted as clear and of acceptable visual quality.
9. The final discharge pipe at the tributary to Mill Creek was not observed.
10. The sludge holding tank has been pumped out annually. Northeast Septic Tank Service hauled the sludge to the Geneva-on-the Lake WWTP and the Northeast Ohio Regional Sewer District. The tanks were pumped out in 2011.
11. Lewis Wastewater Management monitors and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Laboratory analysis is performed by Clean Streams of Madison, OH.

NPDES Permit Compliance Review

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

Limit Violations

The following limit violations were noted for the reporting period reviewed:

Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
50060	Chlorine, Total Residual	1D Conc	0.038	.3	5/31/2011

Ohio EPA received a written response to this violation on April 27, 2012, indicating that this was a startup issue with the disinfection system. No additional information is needed to respond to the violation.

Reporting Violations

No reporting violations were noted for the reporting period reviewed.

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
09/01/2011	08/31/2016	11/01/2012	Not Complete	95999	Report	E. Coli Evaluation
09/01/2011	08/31/2016	11/01/2012	Not Complete	95999	Construction	Submit PTI if Needed
09/01/2011	08/01/2016	03/01/2013	Not Complete	05699	Construction	Achieve Final Limits

As milestones have yet to be reached, no response is needed.

Comment

1. **Operator of Record Notification:** A check of Ohio EPA's website indicates Dustin Lewis as the sole operator of record of this facility. Lewis Wastewater Management previously notified Ohio EPA that revised Operator of Record (ORC) forms had been sent in listing all operators of record for this site. At a minimum Roger Osborn should be also listed as the operator for this site. Please provide this office with a copy of the revised ORC form sent to Columbus adding Mr. Osborn as the ORC.

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

Respectively,

A handwritten signature in black ink, appearing to read "John M. Schmidt". The signature is written in a cursive style with a large, prominent "S" at the end.

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

JMS/cs

cc: Dustin Lewis, Lewis Wastewater Management
Roger Osborn

File: SP/Ashtabula/Jefferson Twp./Ashtabula County JVS (3PT00029)