



**Environmental
Protection Agency**

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

Re: **Notice of Violation**
Erie County
Edison High School
NPDES Permit

June 20, 2012

Mr. Thomas Roth, Superintendent
Edison Local School District
140 South Main Street
Milan, Ohio 44846-9770

Dear Mr. Roth:

On June 13, 2012, a meeting was held to inform you and discuss National Pollutant Discharge Elimination System (NPDES) permit compliance issues at the Edison High School wastewater treatment plant (WWTP). Mr. Chris Rankin, your maintenance supervisor, was also present. An inspection was made following our meeting. A summary of our conversation and recommendations are as follows:

The current NPDES permit has an effective date of December 1, 2007, and expires on November 30, 2012. In order to address prior chronic NPDES permit violations, a Schedule of Compliance was included in the permit providing three years to install wastewater treatment improvements in the form of flow equalization facilities and a sludge holding tank. These were required to be installed by December 1, 2010, and the District has been in violation of this permit condition since then. A Permit to Install (PTI) was obtained in February 2010, but the improvements have not been installed. The prior superintendents were informed of the NPDES permit violation in letters dated August 31, 2010, and May 17, 2011. We requested responses in order to gain compliance; however, none were forthcoming.

I am once again asking the District to notify me in writing within 30 days of receiving this letter of your plans to install the required improvements. Please include a fixed date schedule indicating when final installation can be completed. I informed you that it will be necessary to resubmit the PTI application since the original permit has long since expired.

As previously noted, the District has been in violation of the NPDES compliance schedule since December 1, 2010. Should you fail to satisfactorily respond, I am prepared to recommend escalated enforcement action in order to gain your compliance.

Mr. Thomas Roth
June 20, 2012
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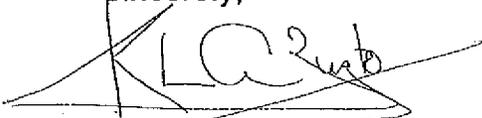
During my inspection, I found all major treatment components in operation and a clear final effluent being discharged from the plant. Mr. Rankin discovered a buried 4,000 gallon trash trap, which was recently cleaned for the first time. This should aid in overall operations. Monthly NPDES discharge monitoring reports are being received and a review of data continues to report chronic final effluent ammonia violations. A copy of the violations was provided at the meeting. A copy of my completed inspection report is enclosed.

I also informed you that the NPDES permit expires on November 30, 2012. I provided you a copy of our January 30, 2012, notification letter informing you of the expiration date and the renewal application and applicable fee is due six months prior to expiration. The renewal was due May 30, 2012. We have not received the renewal application and Mr. Rankin stated that he would submit it as soon as possible.

Although currently well maintained by Mr. Rankin, this treatment plant was originally installed to serve the high school in the early 1970's, and is approximately 40 years old. The current improvement project would be the second major upgrade in the last ten years. This type of sewage treatment facility was not designed for permanent usage, and the board should begin evaluating long term plans for its eventual elimination and replacement by a pump station and force main to the Village of Milan.

I will await your response. If any of the above is incorrect, or you have any questions, please call me at (419) 373-3020 or email at rick.zuzik@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Zuzik", is written over a horizontal line. The signature is somewhat stylized and includes a date "6/20/12" written in the middle.

Richard A. Zuzik, MSE
Division of Surface Water

/jlm

Enclosure

pc: Erie County Health Department
AKE Environmental

ec: Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY

OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 25,000 GPD

Facility Name Edison High School NPDES Permit No. 2PR00174
 Expiration Date 11-30-12
 Facility Address 2603 SR 113 Date 6-13-12 Time 11:00 (am/pm)
 City _____ County Erie Township Milan
 Name and Address of Owner Edison Local School District, Thomas Roth, Supt
 Person Contacted Tom Roth, Chris Rankin (419) 541-1342 Owner Phone (419) 499-3000 x112
 Flow: Design 15,000 GPD Present _____ GPD (metered - estimated)
 Trib. Pop. 600 students & staff (actual estimated) Weather at time of inspection: Temp 70° Clear
 OEPA Personnel Rick Zuzik District NWDO

1. Plant Effluent - Mark Severity No.

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
<u>0</u>	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: Tributary to Huron River

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
<u>0</u>	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has _____ excellent / good _____ fair _____ poor operation
 b. Plant has _____ excellent / good _____ fair _____ poor maintenance
 c. Sand filters have _____ excellent / good _____ fair _____ poor maintenance

d. Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/ solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) _____

Disinfection: (Required May 1 thru Oct.31.)

IN <u>/</u>	OUT _____	Chlorination Tablets
_____	_____	Dechlorination Tablets
_____	_____	U.V.

Yes No 1/1 to 5/12
 4. / Compliance with NPDES Permit

Periodic Violations Y N Parameters:
 Chronic Violations / Ammonia

5. / Adequate plant safety
 6. / Operation and Maintenance Service

Name AKE Env. & Chris Rankin

7. / logbook on-site

Frequency of Visits 3x/week
currently Class I

Facility Name: Edison H.S.

Process	# Units	Unit	If Needed - Description and Comments
Preliminary	1	Trash Trap	Pumping Frequency: 4000 gal. tank recently discovered & cleaned
		Grease Trap	Pumping Frequency:
		Bar Screen	
		Comminutor	
		Flow Equalization	
Aeration Equipment		Plant Timer ___Y___N	Cycle Time:
	2	Motor/ Blower Unit	
Secondary Treatment		Aeration Tank	Color: Brown Adequate Aeration: Y <input checked="" type="checkbox"/> N ___
Final Settling	1	Clarifier	turbid
	2	Sludge Return	In / Out
	2	Surface Skimmer	In / Out
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	Well Kept
		Polishing Pond	
		Other	
Disinfection	1	Contact Tank	
	1	Chlorine Tube Feeder	IN
	1	Dechlorination Tube Feeder	IN
		Ultraviolet (UV)	
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
		Sand Filter Effluent Dosing	
Sludge Handling		Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal	<input checked="" type="checkbox"/>	Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment	<input checked="" type="checkbox"/>	Post Aeration	IN
		Spray Irrigation	
		Other	