



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

February 8, 2013

RE: ODOT COLEBROOK 04-42 REST AREA
NPDES PERMIT NO. 3PP00016
COLEBROOK TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Thomas Wathen
Head of Building Maintenance
Ohio Department of Transportation
2088 S. Arlington Rd.
Akron, Ohio 44306

Dear Mr. Wathen:

On February 7, 2013, a site inspection was conducted at the above referenced facility on the west side of State Route 11 south of U.S. 6, Colebrook Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Mr. Wayne White 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 February 10, 2012.

The system consists of a trash trap, extended aeration tanks, clarifiers, fixed media filters, dosing tank, 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 an unnamed tributary to Mosquito Creek adjacent to the west 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 10,000 gallons per day, although the plant is not receiving anywhere near that flow since the rest area was converted over to low-flow plumbing. The plant operates continuously.
2. The plant is currently operated by Mr. Wayne White of Winelco Inc. under contract to ODOT. David Park of ODOT operated the plant up to February 1, 2012, Mr. Douglas Gerry of Winelco operated the plant from February 1 through February 23, 2012, and Mr. Wayne White has operated the plant since February 23, 2012 on behalf of ODOT. Mr. White is currently listed as the Operator of Record (ORC) of this facility.
3. Logbooks, a copy of the operator contract, a copy of the NPDES permit, and the operation and maintenance manual are maintained at the site by the current operator, Winelco, and were available for inspection. The onsite information was reviewed and found compliant with OAC 3745-7-09.

4. The overall condition of the treatment plant during this inspection was satisfactory with the plant well kept. Collected trash is typically pumped out every 4 to 6 months and containerized for disposal at a solid waste landfill.
5. The flow equalization tank pumps were cycled and found in operable condition. The alarms were not found in operating condition. Mr. White indicated he would investigate the cause of malfunctioning alarms and get them corrected as soon as possible.
6. The content of the aeration tank had a medium color, a slight musty odor, and good mixing. Sludge returns were a medium brown color with minimal foaming. The blowers were cycled and found in operating condition.
7. The surface of the clarifier was clear. The skimmers were found in operating condition. Effluent channels were clean and Mr. White indicated that channels were scraped down weekly. The foam spray system was inspected and found not operating.
8. The fixed media filters were inspected and appeared to be in operating condition, producing a clear effluent.
9. Surface sand filter dosing pumps were cycled and found in operating condition. The alarms were not found in operating condition. Mr. White indicated he would investigate the cause of malfunctioning alarms and get them corrected as soon as possible.
10. Surface sand filters were found reasonably free of vegetation. A moderate amount of leaf litter was noted, typical for late winter. The east bed did not have elbows installed, and significant erosion of the sand was noted. The bed needs to be raked and elbows installed, and additional rip-rap around the dissipation pad is recommended if erosion is still noted. 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 observed at the outlet of the chlorine contact tank and found to be clear. The tablet chlorinator and dechlorinator were not inspected, as the disinfection will not commence until May.
12. The final outfall was observed of acceptable visual quality. The outfall signage has been updated to be compliance with Part II, Item I of your permit.
13. The sludge holding tank was not being aerated and is currently decanting. The facility log reflects that sludge is normally wasted to the sludge tank weekly and is removed from the sludge tank and hauled to another POTW approximately twice per year.
14. 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 Winelco. Mr. White from Winelco currently performs on-site analysis of pH and DO, and also records the visual observations of odor, color, turbidity.
15. Cardinal Laboratories and/or Winelco Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.

16. Prior to February 1, 2012, Mr. Parks submitted the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system. Commencing with the February 2012 data, Mr. White of Winelco submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of ODOT.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period January 1, 2012 through January 1, 2013 indicates noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance noted 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	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.46	4/1/2012
001	00300	Dissolved Oxygen	1D Conc	5.0	3.1	11/4/2012

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of the violations, along with measures taken to ensure that they are not repeated. Mr. White notified Ohio EPA of the April 2012 violation, along with measures to ensure that it will not be repeated on June 12, 2012. A review of the log book indicates that Winelco incorrectly reported the November 4, 2012 DO reading as 3.1 mg/l when it was actually 8.1 mg/l. Winelco must revise the November 2012 eDMR submission to reflect the true value.

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			AK	6/25/2012

Part III, Item 12 of your NPDES permit requires you to notify Ohio EPA of the violations, along with measures taken to ensure that they are not repeated. Mr. White notified Ohio EPA of the violation, along with measures to ensure that it not repeated on July 30, 2012. A dead crawfish was removed from the tablet dechlorinator. No additional information is needed to respond to the violation.

Compliance Schedule

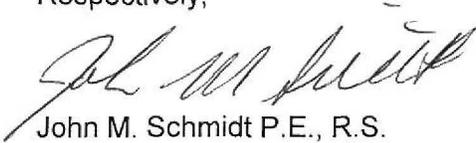
Ohio EPA notes the following regarding your compliance schedule contained within your NPDES permit:

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	Incomplete	95999	Other	E. Coli Status Report
10/1/2010	9/30/2015	11/01/2011	Incomplete	-----	Other	Disinfection PTI If Needed
10/1/2010	9/30/2015	12/01/2011	Incomplete	95999	Other	E. Coli Status Report
10/1/2010	9/30/2015	04/01/2012	Incomplete	05699	Other	Operational Level Attained

As the October 2011 through April 2012 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. From examination of the data collected, it appears that the facility will be able to meet the new E. Coli standards. This was referenced in the 2011 inspection and to-date no status report has been received. A status report must be submitted as soon as possible.

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: Daniel Ullman, Winelco, Inc
Wayne White

File: SP/Ashtabula/Colebrook Twp./ODOT Colebrook Rest Area 04-42 (3PP00016)