



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

February 8, 2013

RE: ODOT DORSET MAINTENANCE OUTPOST
NPDES PERMIT NO. 3PP00041
DORSET TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

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 at 3225 State Route 193, Dorset Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody represented either Winelco, Inc., or the Ohio Department of Transportation (ODOT), although facility compliance was discussed with Mr. Wayne White of Winelco prior to conducting 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 February 10, 2012.

The system consists of a trash trap, extended aeration tanks, clarification, 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 Mill Creek adjacent to the north 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 1,000 gallons per day, although the plant is not receiving anywhere near that flow. The plant operates on a timer for a few hours in the morning and few hours in the afternoon when the plant receives flow.
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. Log books, a copy of the operator contract, a copy of the permit, and the operation and maintenance manual are maintained at the site by the current operator, Winelco, and were available for inspection. Onsite items were inspected and found complaint 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 was containerized for disposal at a solid waste landfill.
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 plant tank top elevations are the same as the surrounding ground within the drainage area of the building and parking area, diverting storm water and snow melt into the tanks. This is not acceptable and places an undue hydraulic burden on the WWTP. The tanks must have a riser or other means of diverting storm water from draining into the tops of the tanks through the grating. This was noted during the 2011 and 2012 inspections and remains unaddressed. Mr. White indicated that in 2013 there are plans to install an interceptor drain to divert roof drain and parking lot runoff from the WWTP.
7. The content of the aeration tank had a light brown color with little solids, no odor, and good mixing. Sludge returns were also a light brown color with minimal foaming. This is an indication of a plant that is biologically under-loaded. The blowers were cycled and found in operating condition. The alarms were tested and not found in operating condition. The source of the malfunctioning alarms must be investigated.
8. The surface of the clarifier was clear. Skimmers were in operating condition. Effluent weirs and channels were clean.
9. Surface sand filter doing pumps were cycled and found in operating condition. The alarm was tested and not found in operating condition. The source of the malfunctioning alarms must be investigated.
10. Surface sand filters were inspected, with the beds noted as reasonably clean and level. The west bed was noted in operation. 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 of acceptable visual quality. The final discharge was observed in acceptable visual quality in the manhole on ODOT's property prior to the final outfall. The final discharge at Mill Creek could not be observed, as it is located on private property. The outfall signage has been replaced and is now compliant with Part II, Item I of your permit.
12. 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.
13. Cardinal Laboratories and/or Winelco Laboratories provides the sample bottles and preservatives and performs laboratory analysis of collected samples.

14. 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.
15. The facility also installed a 500-gallon oil/water separator and a 6,000-gallon holding tank for the vehicle maintenance building.
16. Materials from the holding tank are removed for off-site solidification and disposal at a municipal solid waste landfill. Liquids are hauled by a contracted licensed waste hauler.
17. Two 1,000-gallon fuel tanks (one gasoline, one diesel) are located on the property. These tanks are double walled and sit on a concrete pad.
18. Two single walled brine tanks are located on the property for making a deicing solution. Containment berms appear to be constructed out of gravel; which will do little to contain the brine should a spill, leak, or rupture occur. The containment berms must be reconstructed out of a less permeable material such as clay or lined with a flexible membrane liner.

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 that there are no effluent violations or reporting violations. Compliance schedule violations are noted as follows:

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.

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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/Dorset Twp./ODOT Dorset Outpost (3PP00041)