



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

May 24, 2013

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 May 23, 2013, 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. Virgil Cole representing the Ashtabula County Technical and Career Campus (ACTCC), formerly known as the Ashtabula County Joint Vocational School and Mr. Roger Osburn 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 April 26, 2012.

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 Osburn (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 and Mr. Virgil Cole of the ACTCC perform daily operations at the WWTP with oversight by Mr. Osburn.
2. Log books, contract, 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. 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 some floating grease directed to the skimmer. Effluent channels and weirs could use some cleaning. 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 Southeast Surface sand filter was operating at the time of the inspection. Netting has been installed to keep vegetation growth down and it seems to be working well. The Northeast bed and Southwest bed were in the process of having vegetation removed and will have netting installed. 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 and operating at the time of the inspection. Liquid chlorine is fed and dechlorination tablets are used. 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 on August 7, 2012.
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 eDMRs received by Ohio EPA for the period March 1, 2012 through April 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

#### **Effluent Limit Violations**

No violations of effluent limits were noted for the monitoring period reviewed.

#### **Reporting Violations**

No reporting code or reporting frequency violations were noted for the monitoring period reviewed.

#### **Compliance Schedule**

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

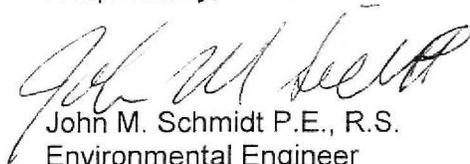
Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
09/01/2011	08/31/2016	11/01/2012	Not Complete	95999	Report	E. Coli Evaluation
09/01/2011	08/31/2016	11/01/2012	Not Applicable	95999	Construction	Submit PT1 if Needed
09/01/2011	08/01/2016	03/01/2013	09/01/2012	05699	Construction	Achieve Final Limits

**To-date, Ohio EPA has not received a status report on the ability of the treatment system to meet effluent limits for E. Coli.** Based upon a review of the eDMR data for the time period reviewed, it appears that this facility will be able to meet the effluent limits. Please provide a status report as soon as possible.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed.

If you have any questions or comments regarding this inspection, 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: Dustin Lewis, Lewis Wastewater Management  
Roger Osburn

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

