



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

September 26, 2013

RE: ACCAA EARLY HEAD START
OHIO EPA PERMIT 3PR00604
ASHTABULA TWP., ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. William Niemi, Director of Administrative Services
Ashtabula County Community Action Agency
6920 Austinburg Road
P.O. Box 2610
Ashtabula, OH 44005-2610

Dear Mr. Niemi:

On September 24, 2013, a site inspection was conducted at the above referenced facility at 6920 Austinburg Road, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody represented the Ashtabula County Community Action Agency (ACCAA) during the inspection, although Ohio EPA spoke briefly with Carmen Kuula, Director of Deveopment, prior to 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. This is the first compliance inspection for this facility.

The wastewater treatment system dates to the construction of onsite structures as a church in 1960. The 14-acre property was acquired by the Ashtabula County Community Action Agency from First Christian Church on December 3, 2008. The property contains a 12,890 SF dormitory and a 4,693 SF former church renovated into administrative offices. ACAA sees clients to assist them with various programs. Ohio EPA records reflect that the current package plant installed under an approval granted by the Ohio Department of Health on March 2, 1960. The current wastewater treatment facility was constructed in 1960 by Security Septic Tank Co. of Cleveland, OH.

The collection system consists of a gravity system from the dormitory and office building receiving both domestic sewage and high-strength kitchen wastewater. The plant is rated for 3,500 gallons per day. The treatment system consists of a trash trap, extended aeration plant with clarification and a pipe discharge to Hubbard Run to the north of the plant. The facility does not have tertiary treatment or disinfection. Sludge management of sludge removal from an aerated sludge tank when needed. The facility discharges to Hubbard Run located north of the facility. No backup power is provided to the facility, and the facility is provided with limited alarms.

Observations and Notations

The following observations and notations were made during the inspection:

1. The plant operates continuously, and discharges when there is flow to the plant. The plant was discharging at the time of the inspection.
2. No operator of record is designated for this facility.

3. A copy of the NPDES permit, a facility log book, and the operation and maintenance (O & M) manual could not be located at the site and were not available for inspection. **A copy of the NPDES permit, a facility log book, and the O & M manual must be provided and available for inspection at all times.** I left a copy of the NPDES permit and a generic O & M manual with Ms. Kuula during the site visit.
4. The overall condition of the treatment plant during this inspection was acceptable in terms of operating condition, although there are items that need attention that are noted in this letter.
5. The contents of the trash trap were typical. It is unknown the last time that trash was removed from the facility.
6. The blower was noted as operating. The content of the aeration tank was noted as medium brown, with no odor. The south/west tank had good air. The air was uneven in the north/east tank, indicating a possible air leak where the aeration piping enters the water. This should be investigated and repaired as needed.
7. The clarifier was noted as reasonably clear. The weirs could use cleaning. The return sludge lines were noted as discharging a clear liquid, indicating that the sides of the clarifier may need to be scraped down to direct sludge into the bottom on the clarifier.
8. The final discharge to Hubbard Run north of the plant was observed as discharging. The discharge was noted of acceptable visual quality. The stream downstream of the discharge was noted as clear.
9. It is unknown who perform on-site analysis of pH and dissolved oxygen, as well as perform observations of flow and turbidity. It is also unknown who performs laboratory analysis of collected samples.
10. It is unknown who submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of ACCAA through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

A review of the electronic Discharge self-Monitoring Reports (eDMRs) received by Ohio EPA for the period August 1, 2013 through September 1, 2013 indicates that eDMR data has not been submitted for this facility.

Limit Violations

No limit violations were noted for the time period reviewed; however, Ohio EPA notes that no eDMR was submitted for the month of August 2013. Therefore, limit violations could not be assessed.

Reporting Violations

As noted above, no eDMR was submitted for the month of August 2013. This report was due to be submitted by September 20, 2013 and per your NPDES permit, was to include flow readings and analytical data for the month of August. Failure to report data is in itself a reporting violation. Quarterly sampling was also due to be collected in the month of August.

Compliance Schedule

The following compliance schedule is noted with your NPDES permit:

Permit No	Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Milestone
3PR00604	8/01/2013	7/31/2016	2/01/2014	Incomplete	01299	Construction	Submit PTI
3PR00604	8/01/2013	7/31/2016	8/01/2014	Incomplete	01899	Construction	Advertise for Bids
3PR00604	8/01/2013	7/31/2016	10/01/2014	Incomplete	03099	Construction	Start construction
3PR00604	8/01/2013	7/31/2016	10/14/2014	Incomplete	-----	Construction	Notify Ohio EPA
3PR00604	8/01/2013	7/31/2016	6/01/2015	Incomplete	04599	Construction	Complete construction
3PR00604	8/01/2013	7/31/2016	6/14/2015	Incomplete	-----	Construction	Notify Ohio EPA
3PR00604	8/01/2013	7/31/2016	8/01/2015	Incomplete	05599	Construction	Attain Oper. Level

As none of the milestones have passed, no action is required at this time.

Other Violations

1. Failure to Designate an Operator of Record - Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class A State Certified Operator as required by Ohio Administrative Code (OAC) 3745-7-02. No official designation has been received by Ohio EPA Central Office. Ohio EPA's operator of record designation form may be found at http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf. Please complete the operator of record form and return to Ohio EPA Central Office. Please provide this office with a courtesy copy of the ORC form in replying to this letter.
2. Failure to Maintain a Facility Log Book: The inspection revealed that records required pursuant to OAC 3745-7-09(A)(3) are not being maintained at the facility and were not available for inspection as required by rule. A log book must be maintained at the WWTP and available for inspection 24 hours a day. This is typically accomplished by posting a mailbox or some other weather-tight container at the WWTP.
3. Minimum Staffing Requirements: Based upon a lack of a log book to document visits by your ORC, ACCAA is in violation of OAC 3745-7-04 for not meeting minimum staffing hour requirements. The facility must be staffed by a licensed operator twice weekly for a total of an hour weekly.
4. Failure to Report Monitoring Data: Part III, Item 4 of your NPDES permit requires you to report data to Ohio EPA electronically. A review of Ohio EPA files finds no data reported for the month of August 2013. This information must be submitted as soon as possible. Instructions for establishing an eDMR account to submit data may be found under Part II, Item 4 of your NPDES permit on page 12.

Comment

1. Annual Sludge Report: Ohio EPA notes that Part II, Item J of your NPDES permit requires you to submit a report no later than January 31st summarizing the sewage sludge disposal, use, storage, or treatment activities during the previous calendar year.
2. Outfall Signage: Ohio EPA notes that Part II, Item K of your NPDES permit requires you to post a sign at your outfall along Cowles Creek. This sign must be posted by December 1, 2013.

Based on the above information, ACCAA is considered to be in **noncompliance** with the terms and conditions of its NPDES permit for your Austinburg Road wastewater facility.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions 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. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

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