



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 15, 2008

Mr. John Beckman
Biederman Educational Center
P.O. Box 488020
Cincinnati, Ohio 45211

Re: Hamilton County, Biederman Educational Center, NPDES Permit Violations

Dear Mr. Beckman:

The Ohio EPA has completed a compliance evaluation of the Monthly Operating Reports covering the months of October 2007 through October 2008 for the Biederman Educational Center. The evaluation indicates violations of the conditions of your NPDES Permit (NPDES Permit # OH0112461; OEPA Permit # 1PZ00051*BD). The specific instances of noncompliance are as follows:

Effluent Limit Violations				
Reporting Period	Parameter	Limit Type	Limit	Reported Value
March 2008	Total Suspended Solids	30D Conc	12	56
March 2008	Nitrogen, Ammonia	30D Conc	3.0	32
March 2008	Total Suspended Solids	1D Conc	18	56
March 2008	Nitrogen, Ammonia	1D Conc	4.5	32
June 2008	Total Suspended Solids	30D Conc	12	13
June 2008	Nitrogen, Ammonia	30D Conc	1.0	54
June 2008	Total Suspended Solids	1D Conc	18	24
June 2008	Nitrogen, Ammonia	1D Conc	1.5	17
June 2008	Chlorine, Total Residual	1D Conc	0.02	0.08
June 2008	Dissolved Oxygen	1D Conc	6.0	5.1
June 2008	Nitrogen, Ammonia	1D Conc	1.5	92
August 2008	Total Suspended Solids	30D Conc	12	13
August 2008	Nitrogen, Ammonia	1D Conc	1.5	10
August 2008	Nitrogen, Ammonia	30D Conc	1.0	27
August 2008	Nitrogen, Ammonia	1D Qty	0.01	0.02
August 2008	Nitrogen, Ammonia	30D Qty	0.01	0.02
August 2008	Nitrogen, Ammonia	1D Conc	1.5	43

Reporting/Monitoring Frequency Violations						
Reporting Period	Parameter	Sample Frequency	Expected	Reported	Date of Violation	
February 2008	Temperature	1/Week	1	0	02/01/2008	
February 2008	Color	1/Week	1	0	02/01/2008	
February 2008	Odor	1/Week	1	0	02/01/2008	
February 2008	Turbidity	1/Week	1	0	02/01/2008	
February 2008	Temperature	1/Week	1	0	02/08/2008	
February 2008	Color	1/Week	1	0	02/08/2008	
February 2008	Odor	1/Week	1	0	02/08/2008	
February 2008	Turbidity	1/Week	1	0	02/08/2008	
February 2008	Temperature	1/Week	1	0	02/15/2008	
February 2008	Temperature	1/Week	1	0	02/22/2008	
February 2008	Color	1/Week	1	0	02/22/2008	
February 2008	Odor	1/Week	1	0	02/22/2008	
February 2008	Turbidity	1/Week	1	0	02/22/2008	
May 2008	Temperature	1/Week	1	0	05/01/2008	
May 2008	Temperature	1/Week	1	0	05/08/2008	
May 2008	Temperature	1/Week	1	0	05/15/2008	
May 2008	Temperature	1/Week	1	0	05/22/2008	
June 2008	Color	1/Week	1	0	06/01/2008	
June 2008	Odor	1/Week	1	0	06/01/2008	
June 2008	Turbidity	1/Week	1	0	06/01/2008	
June 2008	Flow Rate	1/Month	1	0	06/01/2008	
June 2008	Temperature	1/Week	1	0	06/08/2008	
June 2008	Color	1/Week	1	0	06/08/2008	
June 2008	Odor	1/Week	1	0	06/08/2008	
June 2008	Turbidity	1/Week	1	0	06/08/2008	
June 2008	Temperature	1/Week	1	0	06/15/2008	
June 2008	Color	1/Week	1	0	06/15/2008	
June 2008	Odor	1/Week	1	0	06/15/2008	
June 2008	Turbidity	1/Week	1	0	06/15/2008	
June 2008	Temperature	1/Week	1	0	06/22/2008	
June 2008	Color	1/Week	1	0	06/22/2008	
June 2008	Odor	1/Week	1	0	06/22/2008	
June 2008	Turbidity	1/Week	1	0	06/22/2008	
August 2008	Temperature	1/Week	1	0	08/01/2008	
August 2008	Temperature	1/Week	1	0	08/08/2008	
August 2008	Color	1/Week	1	0	08/08/2008	
August 2008	Odor	1/Week	1	0	08/08/2008	
August 2008	Turbidity	1/Week	1	0	08/08/2008	
August 2008	Temperature	1/Week	1	0	08/22/2008	
August 2008	Color	1/Week	1	0	08/22/2008	
August 2008	Odor	1/Week	1	0	08/22/2008	

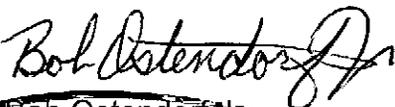
Reporting / Monitoring Frequency Violations (cont.)						
Reporting Period	Parameter	Sample Frequency	Expected	Reported	Date of Violation	
August 2008	Turbidity	1/Week	1	0	08/22/2008	
September 2008	Temperature	1/Week	1	0	09/08/2008	
September 2008	Color	1/Week	1	0	09/08/2008	
September 2008	Odor	1/Week	1	0	09/08/2008	
September 2008	Turbidity	1/Week	1	0	09/08/2008	
September 2008	Temperature	1/Week	1	0	09/22/2008	
September 2008	Color	1/Week	1	0	09/22/2008	
September 2008	Odor	1/Week	1	0	09/22/2008	
September 2008	Turbidity	1/Week	1	0	09/22/2008	
October 2008	Temperature	1/Week	1	0	10/08/2008	
October 2008	Color	1/Week	1	0	10/08/2008	
October 2008	Odor	1/Week	1	0	10/08/2008	
October 2008	Turbidity	1/Week	1	0	10/08/2008	
October 2008	Temperature	1/Week	1	0	10/22/2008	
October 2008	Color	1/Week	1	0	10/22/2008	
October 2008	Odor	1/Week	1	0	10/22/2008	
October 2008	Turbidity	1/Week	1	0	10/22/2008	

Please be advised that failure to comply with the effluent limitations, monitoring, or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please inform this office, in writing, within ten days of receipt of this notification as to the reason for the above referenced violations, as well as a description of the actions taken or proposed to prevent further violations. Your response should include the dates, either actual or proposed, for completion of said actions. Future violations must be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

If you have any questions regarding the above, please contact me at (937) 285-6107.

Sincerely,



Bob Ostendorf Jr.
Division of Surface Water
Permit Section

cc: Hamilton County Health District



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**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PZ0005120090309

HAMILTON BIEDERMAN EDUCATIONAL CTR

OSTENDORF, ROBE 2009/03/09



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March 5, 2009

Ms. Amy Ammon, General Manager
Biederman Educational Centers. Inc.
P.O. Box 488020
Cincinnati, Ohio 45211

Re: Hamilton County, Biederman Educational Centers. Inc., Compliance Evaluation
Inspection and Notice of Violation

Dear Ms. Ammon:

On February 25, 2009, I conducted a Compliance Evaluation Inspection at Biederman Educational Centers. Inc., (NPDES Permit No. OH0112461; OEPA Permit No. 1PZ00051*BD). Representing this facility was Mr. Greg Beckman of Beckman Environmental. A copy of the inspection report has been included with this letter.

The items listed below require a written response by Biederman Educational Centers. Inc. Details of the below listed items can be found in the inspection report included with this letter.

- As part of the inspection process a compliance review was performed on the facility for the time period of November 1, 2008 through January 31, 2009. Appendix A of the inspection report lists Final Effluent and frequency / Monitoring violations for the timeframe reviewed. Please inform this office, in writing, within ten days of receipt of this notification as to the reason for the above referenced violations, as well as a description of the actions taken or proposed to prevent further violations. Your response should include the dates, either actual or proposed, for completion of said actions. Please be advised that failure to comply with the effluent limitations, monitoring, or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111
- The facility has two blowers onsite and only one blower is in use due to an incorrect sheave needing to be replaced on one of the blowers. Repair of the blower with the correct sheave will need to be completed and reported to this office by no later than April 15, 2009.
- As of the date of this letter, a written response to the Notice of Violation dated December 15, 2008 has not been received. A copy of the letter has been included for your use. Please inform this office, in writing, within ten days of receipt of this notification as to the reason for the above referenced violations, as well as a

Ms. Amy Ammon
March 5, 2009
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description of the actions taken or proposed to prevent further violations. Your response should include the dates, either actual or proposed, for completion of said actions. Please be advised that failure to comply with the effluent limitations, monitoring, or reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111

The following items will not require a written response:

- I recommend that as part of the process control procedures that the measurement of DO in the aeration tank be performed. Covering of the treatment system to retain heat may also be something to consider. I would encourage the viewing of the MLSS under a microscope to determine the type of microorganisms present. Due to the color of the MLSS, the lack of wasting for the previous year and the final effluent violations for ammonia, it would appear that the treatment system may be having difficulties in maintaining an adequate population of nitrifying microorganisms.
- The operator log book was not available at the time of the inspection. The log book is required to be onsite and available for review per OAC 3745-7-09. This matter will need to be addressed immediately.

If you have any questions or concerns regarding this matter please feel free to contact me at (937) 285-6107 or via email at: Robert.Ostendorf@epa.state.oh.us .

Sincerely,



Bob Ostendorf Jr.
Division of Surface Water
Permits Section

Enclosure

cc: Mr. John Beckman, Beckman Environmental



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PZ00051*BD	OH0112461	02/25/09	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Biederman Educational Centers, Inc. 5195 North Bend Road Cincinnati, OH 45211	12:45	8/1/07
	Exit Time	Permit Expiration Date
	1:30	7/30/12
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Greg Beckman Operator, Beckman Environmental	513-752-3570	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Greg Beckman Operator, Beckman Environmental	513-752-3570	
Name, Address and Title of Responsible Official	Phone Number	
Amy Ammon General manager P.O. Box 488020 Cincinnati, OH 45248	513-461-0339	

Ohio EPA Inspector	Ohio EPA Reviewer
 Bob Ostendorf Jr. Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
3-5-09 Date	3/6/09 Date

Average Daily Design Flow:	1,500 Gallons/Day
Plant Serves:	Child Care / Education Center
Average Daily Flow: (Period of Review):	550 Gallons/Day (01/01/08 - 01/01/09)
Method of flow monitoring:	Meter
Type of alarms for plant:	Visual

Pretreatment

Type of Pretreatment: **Flow EQ**
 Does the Trash Trap need pumped: **Yes**
 Maintenance of pretreatment components is: **Good**

Comments/Status:

At the time of the inspection the trash trap was full and required pumping.

**Secondary Treatment
(Aeration)**

Color of sludge: **Dark Gray**
 Quality of Sludge: **Heavy**
 Foam: **None present**
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Fair**

Comments/Status:

Mr. Beckman stated that one of the two blowers was currently not in use due to an incorrect sheave being installed. Mr. Beckman indicated that he was in the process of ordering a new sheave and getting it installed. Mr. Beckman and I discussed the normal and routine process control tests. Mr. Beckman stated that a DO reading was not routinely performed on the aeration portion of the process. The color of the MLSS was dark gray and the effluent was turbid. In the recent past the facility has also had ammonia violations of the final effluent. These observations may indicate that the DO in the aeration tank is low or that a toxic material is being received preventing the growth of nitrifiers. I recommend that the DO in the aeration tank be checked periodically to confirm that a DO of at least 2.0 mg/l is being maintained. I would also recommend that the MLSS be viewed under a microscope to determine the types of microorganisms present. Other factors which may contribute to inhibited nitrification is a low water temperature, a pH of less than 6.5, and low alkalinity.

**Secondary Treatment
(Settling)**

Clarity: **Cloudy**

Appendix A

Final Effluent Violations (Period of Review: 11/01/08 – 02/01/09)

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2008	Ammonia	Daily Conc	4.5	21	12/1/2008
December 2008	Ammonia	Monthly Conc	3.0	24	12/1/2008
December 2008	Ammonia	Daily Qty	0.03	0.05	12/1/2008
December 2008	Ammonia	Monthly Qty	0.02	0.05	12/1/2008
December 2008	Ammonia	Daily Conc	4.5	16	12/2/2008
December 2008	Ammonia	Daily Conc	4.5	35	12/3/2008

Frequency / Monitoring Violations

Reporting Period	Parameter	Sample Frequency	Expected	Reported	Violation Date
November 2008	Temperature	1/Week	1	0	11/08/2008
November 2008	Temperature	1/Week	1	0	11/22/2008
November 2008	Color	1/Week	1	0	11/08/2008
November 2008	Color	1/Week	1	0	11/22/2008
November 2008	Odor	1/Week	1	0	11/08/2008
November 2008	Odor	1/Week	1	0	11/22/2008
November 2008	Turbidity	1/Week	1	0	11/08/2008
November 2008	Turbidity	1/Week	1	0	11/22/2008
December 2008	Temperature	1/Week	1	0	12/08/2008
December 2008	Temperature	1/Week	1	0	12/22/2008
December 2008	Color	1/Week	1	0	12/08/2008
December 2008	Color	1/Week	1	0	12/22/2008
December 2008	Odor	1/Week	1	0	12/08/2008
December 2008	Odor	1/Week	1	0	12/22/2008
December 2008	Turbidity	1/Week	1	0	12/08/2008
December 2008	Turbidity	1/Week	1	0	12/22/2008

Permit #: 1PZ00051*BD
NPDES #: OH0112461

Condition of Weir: **Clean**
Weir is level: **Yes**
Effluent in weir: **Light Solids**
Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Good**

Comments/Status:

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: N/A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Upflow	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Good**

Comments/Status:

Sludge Handling/Storage Disposal

Hauler name:
Disposal Site:
How often is sludge wasted:
Sludge drying beds: **No** Sludge holding tank: **No**

Overall maintenance of components is: **Fair**

Comments/Status:

The annual Sewage Sludge Report for this facility indicates that no sludge was removed from this facility in 2008. Mr. Beckman confirmed this during the inspection.

Plant Discharge

Discharge point is a: **Ditch**
Name of discharge point: **Unnamed tributary of Taylor Creek.**
Discharge is visible: **Yes** Quality of Effluent: **Cloudy**

Comments/Status: