



**Environmental
Protection Agency**

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



1PT0008420081114

BUTLER

MADISON LOCAL SCHOOLS WWTP

SARLE, EDWARD

2008/11/14

new



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 Korteski, Director

November 14, 2008

Mr. Curtis Philpot
Madison Local School District
1324 Middletown- Eaton Road
Middletown, Ohio 45042

Re: Butler County, Middletown-Eaton Road Campus, Compliance Evaluation Inspection
and Notice of Violation

Dear Ms. Kesselring:

On November 10, 2008, Bob Ostendorf and I conducted a Compliance Evaluation Inspection at the Middletown-Eaton Road Campus (NPDES Permit No. OH0123251; OEPA Permit No. 1PT00084*BD). The inspection was also conducted as part of the NPDES Permit renewal. Representing this facility was Matt Fraley and Don Briggs. A copy of my inspection report is enclosed.

The inspection report contains two marginal areas. The Effluent / Receiving Waters section was rated marginal as a result of the NPDES Permit violations. The Flow Measurement section was rated marginal as a result of the failure to monitor and report the daily WWTP flow rate.

The areas noted in the report summary will require a written response by December 5, 2008. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

If you have any questions, please call me at (937) 285 - 6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosures

cc: Matt Fraley, WWTP Operator





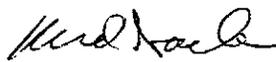
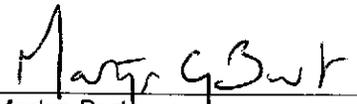
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PT00084*BD	OH0123251	11/10/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Madison Local School District Middletown-Eaton Road Campus 1368 Middletown-Eaton Road Middletown, Ohio 45042	12:35 P.M.	3/1/2004
	Exit Time	Permit Expiration Date
	1:20 P.M.	2/28/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Matt Fraley, WWTP Operator Don Briggs, School Maintenance	(513) 673-9127 (513) 464-1123	
Name, Address and Title of Responsible Official	Phone Number	
Curtis Philpot, Interim School Superintendent 1324 Middletown-Eaton Road Middletown, Ohio 45042	(513) 420-4750	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	M	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
11/14/08 Date	11/14/08 Date

Permit #: 1PT00084*BD
NPDES #: OH0123251

Summary of Findings / Comments

Areas Requiring a Response

The sludge wasting pipe from the secondary clarifier to the sludge holding tank is not working. Madison must repair this pipe as soon as possible.

The surface sand filters were noted as being uneven. These filters should be graded so that they are level. This will ensure the wastewater is dosed to the greatest area possible.

The WWTP flow rate is estimated using an elapse time meter on the surface sand filter dosing pumps. The NPDES Permit requires the flow rate to be monitored and reported on a daily basis. However, the same flow rate is being reported for each day of each month. This is not acceptable. The flow rate must be monitored and reported on a daily basis.

On December 21, 2006, the Ohio EPA adopted new operator certification requirements. The new regulations are addressed in OAC 3745-7. As of December 21, 2006, an operator's log book was required to be maintained for each WWTP. An operator's log book was only recently started for this facility. The information required in the operator's log is addressed in OAC 3745-7-09. Please ensure your log book complies with these requirements. A copy of this rule is enclosed for your information. An Operator of Record Notification Form is also required to be submitted for each WWTP. A copy of this form is also enclosed for your information. Please submit this form as soon as possible to the address indicated on this form.

Areas Not Requiring a Response

A review of the Monthly Operating Reports (MORs) for March 2004 through September 2008 indicated numerous NPDES Permit violations. These violations are listed on Attachment I. The noted violations have been reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification". Future violations must continue to be reported as required by the permit. The Madison Local School District (Madison) must take all possible action to prevent future violations.

The WWTP is designed for an average daily design flow rate of 0.024 MGD and a peak daily design flow rate of 0.036 MGD. The September 2006 through September 2008 MORs indicated the average daily flow rate was 0.012 MGD and the peak daily flow rate was 0.023 MGD.

The WWTP consists of a pump station, trash trap, flow equalization tank, aeration tank, secondary clarifier, dosing tank, surface sand filters, and ultraviolet disinfection. An aerated sludge holding tank is also provided. The trash trap is pumped once a year. The sludge holding tank is pump two times a year. The pumped wastewater is then hauled to the Middletown WWTP.

Permit #: 1PT00084*BD
NPDES #: OH0123251

Solids collected on the surface sand filters is raked and then placed into plastic trash bags. This solid waste is then hauled to a municipal landfill.

Matt Fraley started as the technical supervisor for the WWTP operations in March 2007. He is a class III operator.

Finally, the NPDES Permit renewal will require the WWTP be under the supervision of a Class A operator. The minimum staffing as detailed in OAC 3745-7-04 will also be included in the NPDES Permit renewal. A copy of the Class A WWTP Operator application is enclosed for your information.

Attachment I
 Effluent Limit Violations for March 2004 through September 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
May 2004	Ammonia	Monthly	mg/l	1.0	9.0
May 2004	Ammonia	Monthly	kg/day	0.09	0.24
May 2004	Ammonia	Weekly	mg/l	1.5	9.0
May 2004	Ammonia	Weekly	kg/day	0.14	0.24
June 2004	CBOD5	Monthly	mg/l	10	73
June 2004	CBOD5	Monthly	kg/day	0.91	1.1
July 2004	TSS	Monthly	mg/l	12	18
August 2004	TSS	Monthly	mg/l	12	14
October 2004	Fecal Coliform	Monthly	#/100ml	1000	1300
May 2005	TSS	Monthly	mg/l	12	46
May 2005	TSS	Monthly	kg/day	1.1	1.3
May 2005	TSS	Weekly	mg/l	18	46
August 2005	Fecal Coliform	Monthly	#/100ml	1000	10000
August 2005	Ammonia	Monthly	mg/l	1.0	5.9
August 2005	Ammonia	Monthly	kg/day	0.09	0.53
December 2005	DO	Daily	mg/l	6.0	3.0
January 2006	DO	Daily	mg/l	6.0	5.0
January 2006	DO	Daily	mg/l	6.0	5.0
March 2006	DO	Daily	mg/l	6.0	5.0
July 2006	Chlorine	Daily	mg/l	0.019	0.1
August 2006	Fecal Coliform	Monthly	#/100ml	1000	2100
August 2006	DO	Daily	mg/l	6.0	5.0
August 2006	DO	Daily	mg/l	6.0	5.0
August 2006	Fecal Coliform	Weekly	#/100ml	2000	2100
August 2006	DO	Daily	mg/l	6.0	5.0
September 2006	Fecal Coliform	Monthly	#/100ml	1000	1300
September 2006	DO	Daily	mg/l	6.0	5.0
September 2006	DO	Daily	mg/l	6.0	5.0
September 2006	Chlorine	Daily	mg/l	0.019	0.19
September 2006	DO	Daily	mg/l	6.0	5.0
October 2006	DO	Daily	mg/l	6.0	4.0
October 2006	DO	Daily	mg/l	6.0	5.0
October 2006	DO	Daily	mg/l	6.0	3.0
November 2006	DO	Daily	mg/l	6.0	5.0
August 2007	Ammonia	Monthly	mg/l	1.0	1.4



Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit

Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #: _____ STU # _____ Classification: _____

Name of Facility Owner or Permittee, Title (Print) _____ Facility Owner or Permittee (Signature) _____

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by: _____	Date of SDWIS update: _____
Date of Compliance Status Letter: _____	

Application for Limited Class A Wastewater Certification

Applications for limited certification MUST be postmarked no later than December 21, 2008.

Failure to properly complete this application may be reason for disapproval.

1. Biographic Information

Social Security Number: _____ - _____ - _____

Print Name: _____
(Last) (First) (I)

Home Mailing Address: _____
(Number) (Street)

(City) (State) (Zip)

(_____) (_____) _____
(Home Phone) (Business Phone)

Non-Refundable Application Fee: \$25.00

All statements in this application are made under oath and are subject to investigation by Ohio EPA. All applications and fees must be postmarked by December 21, 2008. All checks and money orders must be made payable to Treasurer, State of Ohio. All fees are non-refundable. All applications shall be typed or printed legibly in ink and mailed to Ohio EPA, Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049. Failure to complete all sections may cause this application to be disapproved. Applicant's qualifications will be determined from this application.

FOR AGENCY USE ONLY		Postmark Date: _____
Check No. _____	Check I.D. _____	
Check Date _____	Revenue I.D. _____	
Date Received _____	Amount \$ _____	
Rejected _____	Accepted _____	

NOTE: Separate applications and fees must be submitted for each facility and operator.

2. Oath of Operator

THIS APPLICATION WILL NOT BE ACCEPTED IF OATH IS OMITTED

I, the undersigned, do solemnly swear that I am the applicant; that all statements made and information contained in this application and attachments are full and correct to the best of my knowledge and belief; and that I understand any omissions or misrepresentations may result in ineligibility for the certification applied for or revocation of any certificate granted. I also consent to a thorough investigation of my employment record and other experience in related activities for the purpose of verification of my qualifications for the certificate for which I have applied, and I hereby authorize my present and previous employers to provide information concerning the employment record listed.

Signature of Operator Applicant:

3. Background

Have you ever been convicted of, or plead guilty to, a criminal charge of falsification, fraud or terrorism?
___ Yes ___ No

Have you ever had any Ohio operator certifications revoked or do you have a certification under suspension?
___ Yes ___ No

Have you had a certificate revoked or currently suspended in any other state?
___ Yes ___ No

4. Information and Oath of Treatment Works Owner's Representative:

(please print)

Name: _____

Title: _____

Business Address: _____

Business Phone: _____

I hereby apply for the operator named in Section 1 to be a Limited Class A operator for the treatment works named on the back of this form. I am the owner representative for the named system. The named operator has been designated to make decisions regarding the daily operational activities of the named system for at least the 12-month period immediately preceding the postmarked date of this application.

I certify that the statements on this application are true to the best of my knowledge and belief based on my supervision of the applicant.

Signature of Owner's Representative:

Basic Duties and Responsibilities

- List employment in detail, but **ONLY** the wastewater system operating experience which applies to the Class A Treatment Works for which you are applying for limited certification. Attach additional sheets if necessary.
- **Failure to thoroughly describe wastewater duties may be reason for disapproval.**

Employment Dates at this Treatment Works		Time in Months	Treatment Works Name	NPDES Permit#
From Month/Day/Year	To Month/Day/Year			

Your Title	Employer Name	Employer Address
Duties		



Recordkeeping requirements and responsibilities of a certified operator.

- (A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment works, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.
- (1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
 - (2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.
 - (3) At a minimum, the following information shall be recorded:
 - (a) Identification of the public water system, sewerage system, or treatment works;
 - (b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter;
 - (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;
 - (d) Results of tests performed and samples taken, unless documented on a laboratory sheet;
 - (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and
 - (f) Identification of the persons making entries.
 - (4) The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.

(B) A certified operator shall:

- (1) Perform their duties in a responsible and professional manner consistent with standard operating procedures and best management practices;
- (2) Operate and maintain public water systems, sewerage systems, treatment works, and appurtenances so as not to endanger the health or safety of persons working in or around the facility, the public at large, or the environment due to negligence or incompetence; and
- (3) Report all instances of noncompliance with applicable regulations to the operator of record or facility supervisor.

(C) The duties of an operator of record shall include, but not be limited to, those outlined in paragraphs (B)(1) to (B)(3) of this rule and the following additional duties and responsibilities:

- (1) Responsible and effective on site management and supervision of the technical operation of the public water system, treatment works, or sewerage system;
- (2) Immediately notifying the permittee or owner of a public water system, sewerage system, or treatment works, and ensuring the agency and, if applicable, the local regulatory agency, is notified of items that require notification in accordance with sections 6109. or 6111. of the Revised Code, the rules adopted thereunder, or the facility's NPDES permit; and

(D) In the event that there are issues related to paragraphs (A) to (C) of this rule that are within the area of responsibility of, but beyond an operator of record or a certified operator's ability to address, it shall be the operator's responsibility to document any efforts to rectify the problem.

Effective: 12/21/2006

R.C. 119.032 review dates: 12/21/2011

Promulgated Under: 119.03

Statutory Authority: RC Sections 6111.46, 6109.04

Rule Amplifies: RC Sections 6111.46, 6109.04