Ohio | Environmental Protection Agency

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

1PT0001620090415

CLERMONT MONROE ELEM SCH JACKSON, JOSHUA 2009/04/15

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OhioEPA
State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

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

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

April 15, 2009

New Richmond Exempted Village Schools
Attn: Mr. Tom Durbin, Supt.
212 Market Street
New Richmond, OH 45157

Notice of Violation

Cover N.

RE: Monroe Elementary School WWTW/Compliance Evaluation Inspection
NPDES Permit No. OH0040517/OEPA PERMIT NO. 1PT00016*AD

Dear Mr. Durbin:

On April 9, 2009, I conducted an NPDES Compliance Evaluation Inspection at the Monroe Elementary School wastewater treatment works (WWTW). Mssrs. Rob Stropes and Glen Beyer, who represented the facility, were present during the inspection. The contract operator, Buddy Rubby, from National Wastewater Industries was not present.

Please pay special attention to the "items requiring correction" (bold type) located throughout the inspection report, for there are associated compliance schedules.

Thank you and your staff for the time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

Cc: Glen Beyer, New Richmond Exempted Village Schools (with report)
Rob Stropes, New Richmond Exempted Village Schools (with report)
Hank Henke, National Wastewater Industries (with report)

Enclosures

Permit # : 1PT00016*AD
NPDES #: OH0040517

OhioEPA

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
1PT00016*AD	OH0040517	4/9/2009	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Monroe Elementary Schools 2117 Laurel Lindale Road Clermont County, Monroe Township	9:30 a.m.	10/1/2006
	Exit Time	**Permit Expiration Date**
	11:00 a.m.	9/30/2011

Name(s) and Title(s) of On-Site Representatives	Phone Number(s)
Rob Stropes, Monroe Elem. Head Custodian Glen Beyer, District Maintenance	513-553-3183
Name(s), Address and Title(s) of Operator of Record	**Phone Number(s)**
Buddy Ruby, National Wastewater Industries	513-367-5969
Name, Address and Title of Responsible Official	**Phone Number**
New Richmond Exempted Village Schools Attn: Tom Durbin, Supt. 212 Market Street New Richmond, OH 45157	513-553-2616

Ohio EPA Inspector	Ohio EPA Reviewer
4-15-09	Debora Roth P.E. 4/15/09
Joshua Jackson — Date Division of Surface Water Southwest District Office	Debora Roth, P.E. — Date Permits Supervisor Division of Surface Water Southwest District Office

Permit # : 1PT00016*AD
NPDES #: OH0040517

Average Daily Design Flow:	**9,600 Gallons/Day**
Plant Serves:	460 students, Bus Garage (~35 employees)
Average Daily Flow (Period of Review):	**18,100 Gallons/Day (January 2008 - February 2009)**
Method of flow monitoring:	**Elapsed time meter (sand filter dosing pumps)**
Type of alarms for plant:	**High water alarm for dosing pump wet well**

Pretreatment

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

Comments/Status:

This trash trap should be pumpout out without delay. The trash trap and the kitchen grease trap should be pumped out multiple times through the school year.

Secondary Treatment (Aeration)

Color of sludge: **Dark Brown**
Quality of Sludge: **Heavy**
Foam: **Light (white)**
Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	☒	☐	Plant is septic	☐	☒
Blowers are operating	☒	☐	Blowers are on a timer	☒	☐
Skimmers are operating	☒	☐	Plant is flooded	☐	☒
Diffusers are operating	☒	☐	Grating is present	☐	☒
Sludge return is operating	☒	☐			

Maintenance of aerating equipment is...**Poor**

Comments/Status:

Solids need to be wasted out of the system without delay. The blowers should run throughout the entire school day. They should not cycle off during the high flow periods.

Secondary Treatment (Settling)

Clarity: **Solids Present**
Condition of Weir: **Excessive Algae/Solids Build Up**

Permit # : 1PT00016*AD
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Weir is level: **Yes**
Effluent in weir: **Heavy Solids**
Clarifier walls need scraped: **Yes**

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

Comments/Status:

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: **Slow**	☒	☐	**Subsurface**	☐	☒
Distribution box operating	☒	☐	Beds alternated	☒	☐
Are filters ponding/flooding	☒	☐	Beds raked	☐	☒
Sand filters overgrown	☒	☐	Chlorination present	☒	☐
UV present	☐	☒	Dechlorination present	☐	☒

Overall maintenance of components is: **Excellent**

Comments/Status:
There is no dechlorination unit for this facility.

Sludge Handling/Storage Disposal

Hauler name:
Disposal Site:
Sludge wasted from:
How often is sludge wasted:
Sludge drying beds: **Yes** Sludge holding tank: **Yes**

Overall maintenance of components is: **Excellent**

Comments/Status:

Plant Discharge

Discharge point is a: **Ditch**
Name of discharge point: **unnamed tributary of Boat Run**
Discharge is visible: **Yes** Quality of Effluent: **Cloudy**

Comments/Status:

Permit # : 1PT00016*AD
NPDES #: OH0040517

Inspection Findings
(Items for Correction in Bold Type)

EFFLUENT LIMIT VIOLATIONS
(Period of Review: January 2008 – February 2009)

7D = Weekly 30D = Monthly 1D = Daily
Conc. = Concentration (mg/l) Qty.= Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
January 2008	CBOD 5 day	30D Qty	0.364	1.07032
January 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.11	.16649
January 2008	CBOD 5 day	7D Qty	0.546	1.07032
January 2008	Nitrogen, Ammonia (NH3)	7D Qty	0.164	.16649
February 2008	Nitrogen, Ammonia (NH3)	30D Conc	3.0	12.5
February 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.11	.75132
February 2008	CBOD 5 day	30D Qty	0.364	.60106
February 2008	Nitrogen, Ammonia (NH3)	7D Conc	4.5	12.5
February 2008	Nitrogen, Ammonia (NH3)	7D Qty	0.164	.75132
February 2008	CBOD 5 day	7D Qty	0.546	.60106
March 2008	CBOD 5 day	30D Qty	0.364	.507
April 2008	Total Suspended Solids	30D Qty	0.437	.69455
April 2008	CBOD 5 day	30D Conc	10	14.
April 2008	CBOD 5 day	30D Qty	0.364	.97237
April 2008	Total Suspended Solids	7D Qty	0.655	.69455
April 2008	CBOD 5 day	7D Qty	0.546	.97237
June 2008	Fecal Coliform	30D Conc	1000	1400.
August 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.0	8.
August 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.0364	.1511
August 2008	Nitrogen, Ammonia (NH3)	7D Conc	1.5	8.
August 2008	Nitrogen, Ammonia (NH3)	7D Qty	0.0546	.1511
September 2008	Fecal Coliform	30D Conc	1000	3700.
September 2008	Fecal Coliform	7D Conc	2000	3700.
October 2008	Total Suspended Solids	30D Conc	12	80.
October 2008	Total Suspended Solids	30D Qty	0.437	1.02952
October 2008	Total Suspended Solids	7D Conc	18	80.
October 2008	Total Suspended Solids	7D Qty	0.655	1.02952

Please be advised that failure to comply with the effluent limitations or to satisfy the 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 reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed,

for completion of the actions. Future violations must be reported as required by the NPDES Permit as detailed in Part III.12 titled "Non-compliance Notification".

At the time of the inspection, the mixed liquor in the aeration basin was dark brown in color (almost black). It appeared that there was proper mixing and aeration occurring. The clarifier was murky and the solids were not settling correctly. The slow surface sand filter also contained a large amount of solids. The blowers for the aeration system were on a timer.

The school should contract with a hauler to pump solids out of the system without delay and no later than April 27, 2009. The aeration tank blowers should be on enough to maintain healthy dissolved oxygen levels (~2.0 mg/l). The sand filters should be cleaned as well (weeds and solids).

Flow Measurement

The wastewater treatment works (WWTW) serving the Monroe Elementary School is designed to treat and discharge 9,600 gallons/day. According to the discharge monitoring reports submitted by the school, an average daily flow of 18,100 gallons/day were discharged; this figure is based on the elapsed time meter for the sand filter dosing pumps. According to the Tate Monroe Water Association, approximately 3,075 gallons/day of water was used by the school.

As you can see there is a large discrepancy in the "reported discharge flow" when compared to the "water consumption" in the same period of time. The National Pollutant Discharge Elimination System (NPDES) permit for the elementary school WWTW requires accurate reporting of discharge flows. **The school district must resolve the discrepancy between the two different flow values shown above, provide an accurate method for discharge flow measurement (consult with this office), and document everything within a letter to Ohio EPA Southwest District Office. This work must be done no later than May 15, 2009.**

Record Keeping

There was no "Operator of Record" log book located on-site. Ohio Administrative Code 3745-7-09 requires the following:

> *(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 work, 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.

Monroe elementary school shall provide a log book on-site no later than May 1, 2009. This log book must meet all the requirements shown above and must be available upon request (typically during an inspection by Ohio EPA).

Re-rating the WWTW

During the inspection, I explained to Mr. Rob Stropes and Mr. Glen Beyer that a Class I certified wastewater operator is required by permit to be the "Operator of Record" for the WWTW (National Wastewater Industries serves as contract "Operator of Record"). However, the new operator certification rules would allow a lower rating of "Class A" for this facility. The current school maintenance personnel (Mr. Stropes and/or Mr. Beyer) could take the test to get this classification. I have forwarded some information on to them.
Please contact me if you are interested in pursuing this option.

Operator of Record

The Operator of Record for this facility must submit an "Operator of Record Notification Form" (attached) no later than May 1, 2009.

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:	