



**Environmental
Protection Agency**

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



1PT0006820100527

SHELBY

HARDIN ELEMENTARY SCHOOL

LEIBFRITZ, SANDRA 2010/05/27

**Environmental
Protection Agency**

Ted Strickland, Governor
Les Fisher, Lt. Governor
Chris Korfeski, Director

May 27, 2010

John Scheu
Hardin-Houston Local School District
5300 Houston Road
Houston, OH 45333

CERTIFIED LETTER

**RE: Hardin Elementary School WWTP – NPDES No. 1PT00068*CD/OH0096717
Notice of Violation
Compliance Evaluation Inspection – Shelby County**

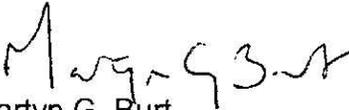
Dear Mr. Scheu:

On May 21, 2010, Sandra Leibfritz conducted an inspection at Hardin Elementary School located at 10207 State Route 47, Sidney, Ohio. Paul Burks and Don Freisthler were representing the facility. Details on the inspection may be obtained from the enclosed report.

Ohio EPA is in the process of renewing Hardin's NPDES permits. Your permit will be drafted with the minimum staffing requirements specified in Ohio Administrative Code 3745-7-04. This rule requires the operator of record for a Class A wastewater treatment plant to be physically present at the plant at least 2 days per week for a minimum of 1 hour per week.

There are six items that require a response. We ask for an immediate action and response on items 1 and 2. For items 4, 5 and 6, we ask for a response no later than June 11, 2010. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,


Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Shelby County Health Department
dfreisthler@woh.rr.com



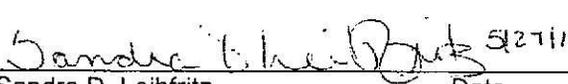


State of Ohio Environmental Protection Agency
Southwest District Office

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
1PT00068*CD	OH0096717	05/21/2010	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Hardin Elementary School 10207 State Route 27 Sidney, OH 45365	10:00 a.m.	November 1, 2005
	Exit Time	Permit Expiration Date
	12:30 p.m.	October 31, 2010
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Paul Burks, Maintenance Don Freisthler, Operator of Record		937.492.2196 937.492.3283
Name(s), Address and Title(s) of Operator of Record		Phone Number(s)
Don Freisthler, Operator of Record 3268 Tawny Leaf Court Sidney, OH 45365		937.492.3283 937.638.9541 (cell) dfreisthler@woh.rr.com
Name, Address and Title of Responsible Official		Phone Number
John Scheu, Superintendent Hardin-Houston Local School District 5300 Houston Road Houston, OH 45333		937.295-3010

Ohio EPA Inspector	Ohio EPA Reviewer
 Sandra D. Leibfritz Division of Surface Water Southwest District Office Date 5/27/10	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date 5/27/10



Permit #: 1PT00068*CD
NPDES #: OH0096717

Average Daily Design Flow:	9,000 GPD
Plant Serves:	~350 Students & ~35 Staff
Average Daily Flow: (Period of Review):	3,332 GPD January 1, 2009 through January 1, 2010
Method of flow monitoring:	Water Records
Type of alarms for plant:	Visual

General Comments/Status:

The existing WWTP consists of a trash trap, equalization basin, aeration tank, clarifier, fixed media clarifier, dosing chamber, slow surface sand filters, chlorination/dechlorination tank with post aeration and a sludge holding tank.
This plant is scheduled to go off-line in approximately one year due to the school district consolidating all grade levels at one location.
The school operates for 9 months out of the year (September through May). Flows continue during the summer months due to cleaning.
The operator and O&M logs are not kept on-site.
A copy of the operator certification was not kept on-site.
Don Freisthler, operator, visits the plant once a week for 1/2 hour. Mr. Freisthler has his Class I WW license.

Pretreatment

Type of Pretreatment: **Trash Trap**
Does the Trash Trap need pumped: **No**
Maintenance of pretreatment components is: **Satisfactory**

Comments/Status:

The trash trap is pumped twice a year (August and December).

Equalization Basin

Two Pumps present: **Yes**
Both Pumps operational: **Yes**
Alarm present: **Yes**
Alarm operational: **Yes**
Maintenance of equalization basin is: **Satisfactory**

Comments/Status:

Aeration was occurring in the equalization (EQ) basin.
There is a dedicated blower to the EQ basin.



**Secondary Treatment
 (Aeration)**

Color of sludge: **Dark Brown**
 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 type="checkbox"/>	<input checked="" 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... **Satisfactory**

Comments/Status:

The blowers are automatically alternated.

**Secondary Treatment
 (Settling)**

Clarity: **Clear**
 Condition of Weir: **Solids Build Up**
 Weir is level: **No**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **No**

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

Comments/Status:

There was ashing and bulking solids on the surface of the clarifier.
 There were heavy solids in the trough and behind the baffles of the clarifier.
 The RAS pump was recently replaced.
 The skimmer was submerged too far beneath the surface of the clarifier to be effective.
 The clarifier is scraped three times a week.
 There is a fixed media clarifier that is split into two equal compartments.



Tertiary Treatment

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

Overall maintenance of components is: **Satisfactory**

Comments/Status:

The dosing chamber pumps were replaced last year. The beds were raked, but are uneven.

Sludge Handling/Storage Disposal

Hauler name:
 Disposal Site:
 Sludge wasted from:
 How often is sludge wasted:

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Unsatisfactory**

Comments/Status:

According to operator of record and maintenance person, sludge is not wasted from the WWTP.

Plant Discharge

Discharge point is a: **Stream**
 Name of discharge point: **Unnamed tributary of Turtle Creek via a field tile**
 Discharge is visible: **Yes**
 Quality of Effluent: **Clear**

Comments/Status:



Items Requiring a Response:

1. A copy of the operator of record certification for Hardin WWTP was not on display at the plant or the office of the owner in violation of Ohio Administrative Code 3745-7-05(C). Immediately display this certification and provide written notification on when this action was completed.
2. The owner and operator of a wastewater treatment plant are required to maintain operation and maintenance records for Hardin WWTP. These records are not kept onsite for twenty-four hour inspection by agency or emergency response personnel in violation of Ohio Administrative Code 3745-7-05(A)(2). Immediately keep these records onsite and provide written notification on when this action was completed.
3. During the inspection, Ms. Leibfritz was informed that chlorine is sent to Brookside Laboratories for analysis. Part III, Item 5 (Sampling and Analytical Method) requires Hardin to follow test procedures and analysis of pollutants in accordance with 40 CFR 136. 40 CFR 136 requires chlorine to be analyzed immediately which means within 15 minutes of sample collection. It is highly unlikely that this maximum holding time can be met since Brookside Laboratories is located approximately 19 miles away from the school. Hardin WWTP is in violation of Part III, Item 5. No later than June 11, 2010, provide a written response on the action or actions taken to prevent any further violations for chlorine or provide a chain of custody form demonstrating that the maximum holding time has been met. As part of your response include your standard operating procedures for dissolved oxygen and pH and provide the last 3 months of your bench sheets.
4. During the inspection, Ms. Leibfritz was informed by Don Freisthler and Paul Burks that solids have never been wasted from the WWTP. The Annual Sewage Sludge Report for 2008 indicates that 6,500 **gallons** of sludge was removed from the WWTP and 3,500 **gallons** of sludge was removed in 2009. The DMR for January 2008 reports that 4,500 **dry tons** of sludge was disposed of by hauling to another NPDES permit holder and that 95,000 **dry tons** of sludge was disposed in February 2009. Please note that septage from the trash traps should not be included on the DMRs or the Annual Sewage Sludge Reports. No later June 11, 2010, explain the discrepancy between the Annual Sewage Sludge Reports and the DMRs. If necessary, submit amended Annual Sewage Sludge Reports and/or DMRs.
5. An integral part in the operations of a WWTP is solids handling. Part of solids handling is the periodic removal of solids from the WWTP. As stated previously, both representatives stated that solids have never been wasted from the WWTP. This was evident by the dark heavy solids in the aeration tank, clear water in the sludge holding tank, heavy solids in the trough of the clarifier weir and solids on the surface of the sand filters. No later than June 11, 2010 describe the standard operating procedure that will be used to determine when solids will be removed from the WWTP.



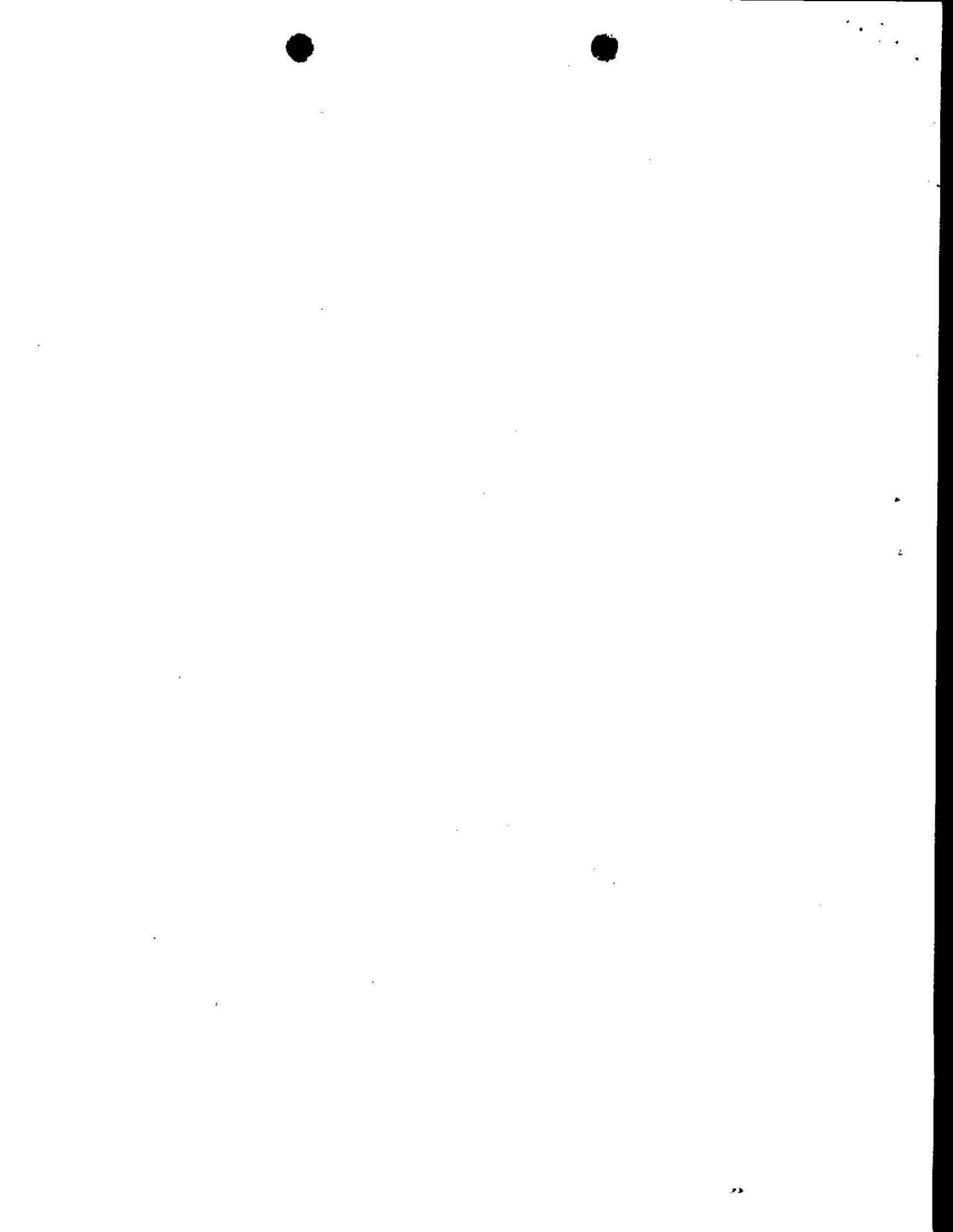
Permit #: 1PT00068*CD
NPDES #: OH0096717

6. During the inspection a pile of solids/sand mixture was observed on the ground outside the concrete walls of the sand filters in violation of Ohio Administrative Code 3754-40. Any solids/sand mixture from the sand filter must immediately be placed in a container (e.g., trash can, dumpster, etc.) for disposal at a landfill. No later than June 11, 2010, provide a written response on the action or actions taken to prevent any further violations. As part of your response, include the date that the existing pile of solids/sand mixture was cleaned up from the ground.

EFFLUENT LIMIT VIOLATIONS
(Period of Review: January through March 2010)

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

Final Effluent Limitations for Outfall 1PT00068001				
Reporting Period	Limit Type	Limit	Reported Value	Violation Date
February 2010	1D Conc	9.0	9.96	2/18/2010



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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

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1. Article Addressed to:

JOHN SCHEU
 HARDIN HOUSTON
 LOCAL SCHOOL DISTRICT
 5300 HOUSTON RD
 HOUSTON OH 45333

2. Article Number

(Transfer from service label)

7007 0220 0001 2491 2139

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Denny Cooper* Agent Addressee

B. Received by (Printed Name)

Denny Cooper

C. Date of Delivery

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