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8/6/09

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August 4, 2009

Mr. Dale Ferbrache, Principal
Fairfield Union Local School District
Fairfield Union High School
6401 Cincinnati- Zanesville Road
Lancaster, OH 43130

Dear Mr. Ferbrache:

Attached is a report regarding a Reconnaissance Inspection that Kelly Thiel and I from this office performed July 22, 2009, at the wastewater treatment plant (WWTP) serving the Fairfield Union High School. Mr. Lee Young from TCCI accompanied us during this inspection.

Attachment "A" of this report lists wastewater discharge permit effluent limitation violations that have occurred during the period of time extending from August 1, 2006 through June 30, 2009. Photographs included in this report show the WWTP and its location in relation to other building at the site.

It has come to our attention that most, but not all, wastewater from the school will soon be routed to the Village of Rushville for treatment. The school district is proposing to use this WWTP for another two years to treat sporadic wastewater flows produced by the bus garage and athletic field house. The WWTP would be downsized in an attempt to provide consistent compliance with wastewater discharge permit final effluent limitations.

This office does not agree with this proposal for the following reasons:

1. Consistent wastewater discharge permit compliance may be difficult due to infrequent flow from the bus garage and athletic field house.
2. Monies for a Permit to Install for WWTP downsizing and for plant maintenance for another two years would be better used in directing all wastewater to the Rushville WWTP now rather than later.

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

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Mr. Dale Ferbrache, Principal
Fairfield Union Local School District
Fairfield Union High School
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Wastewater discharge permit noncompliance will result in escalated enforcement from this office in response to violations.

With these issues in mind please contact either myself or Kelly Thiel at your convenience to arrange a time for a conference call for further discussion of this matter. I can be reached by e-mail at jan.rice@epa.state.oh.us or by telephone at 614-728-2850. Kelly Thiel can be reached by e-mail at kelly.thiel@epa.state.oh.us or by telephone at 614-728-3856.

Sincerely,



Jan A. Rice
Environmental Specialist
Field Operations Unit
Division of Surface Water
Ohio EPA/CDO

c: Lee Young, Operator

JAR/nsm Fairfield Union HS 7-22-09Rlcovlr

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
4PT00003*DD	OH0101826	7/22/09	R	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Fairfield Union Local School District Fairfield Union High School 6401 Cincinnati-Zanesville Road Lancaster, Ohio 43130	11:15 A.M.	8/1/06
	Exit Time	Permit Expiration Date
	11:50 A.M.	7/30/11

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Lee Young, Operator (TCCI)	(o) 740-342-1110 (c) 740-404-7732
Name(s) Address and Title(s) of Operator of Record	Phone Number(s)
Name, Address and Title of Responsible Official	Phone Number
Dale Ferbrache, Principal, Fairfield Union Local School District, Fairfield Union HS 6401 Cincinnati-Zanesville Rd. NE, Lancaster, Ohio, 43130	740-536-7306

C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit
N/N	Records/Reports
N	Operations & Maintenance
S	Facility Site Review
N	Collection System
N	Flow Measurement
N	Laboratory
M/N	Effluent/Receiving Waters – Attachment "A" in this report lists effluent limitation violations that have occurred during the period of time extending from 8/1/06 thru 6/30/09.
N	Sludge Storage/Disposal
N	Pretreatment
None	Compliance Schedules
N	Self-Monitoring Program

D. SUMMARY OF FINDINGS/COMMENTS: The permittee is proposing that wastewater from the athletic field house and bus garage would continue for two years to be routed into the existing WWTP while all other wastewater is routed to the Village of Rushville WWTP. This office strongly prefers that all wastewater be routed to Rushville as quickly as possible. Doing so will help the permittee avoid continued wastewater discharge permit violations as well as avoid expenditure of school funds required to downsize the existing plant. Flow reduction will require the permittee to pay a professional engineer to prepare and submit a Permit to Install (PTI) to this office for approval. Since access to Rushville is available Ohio EPA may deny a PTI for plant downsizing and require connection of all wastewater flow into Rushville. The permittee should contact this office to arrange a meeting for further discussion of this matter.

Jan Rice
Jan Rice, Inspector, Ohio EPA, Central District Office

8/4/09
Date

Erin Sherer
Erin Sherer, Reviewer, Ohio EPA, Central District Office

8/4/09
Date

Attachment "A"
 Fairfield Union High School
 Effluent Limitation Violations
 8/1/06 – 6/30/09

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PT00003*DD	March 2007	001	00530	Total Suspended Solids	7D Conc	18	21.	3/8/2007
4PT00003*DD	March 2007	001	00530	Total Suspended Solids	7D Qty	2.0	3.1794	3/8/2007
4PT00003*DD	July 2007	001	00530	Total Suspended Solids	7D Conc	18	23.	7/8/2007
4PT00003*DD	August 2007	001	00530	Total Suspended Solids	7D Conc	18	20.	8/8/2007
4PT00003*DD	September 2007	001	00530	Total Suspended Solids	30D Qty	1.4	1.45723	9/1/2007
4PT00003*DD	September 2007	001	31616	Fecal Coliform	7D Conc	2000	4700.	9/1/2007
4PT00003*DD	September 2007	001	00530	Total Suspended Solids	7D Qty	2.0	2.7252	9/22/2007
4PT00003*DD	June 2008	001	00530	Total Suspended Solids	7D Conc	18	21.	6/22/2008
4PT00003*DD	June 2008	001	80082	CBOD 5 day	7D Conc	15	17.8	6/22/2008
4PT00003*DD	June 2008	001	00400	pH	1D Conc	9.0	9.2	6/25/2008
4PT00003*DD	March 2009	001	80082	CBOD 5 day	7D Conc	15	19.5	3/8/2009
4PT00003*DD	April 2009	001	00400	pH	1D Conc	9.0	9.7	4/8/2009
4PT00003*DD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	.07	5/6/2009
4PT00003*DD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	.08	5/27/2009
4PT00003*DD	June 2009	001	31616	Fecal Coliform	7D Conc	2000	5100.	6/1/2009
4PT00003*DD	June 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	2.	6/4/2009
4PT00003*DD	June 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	6/9/2009



Figure 1. Existing wastewater treatment plant for the Fairfield Union High School.

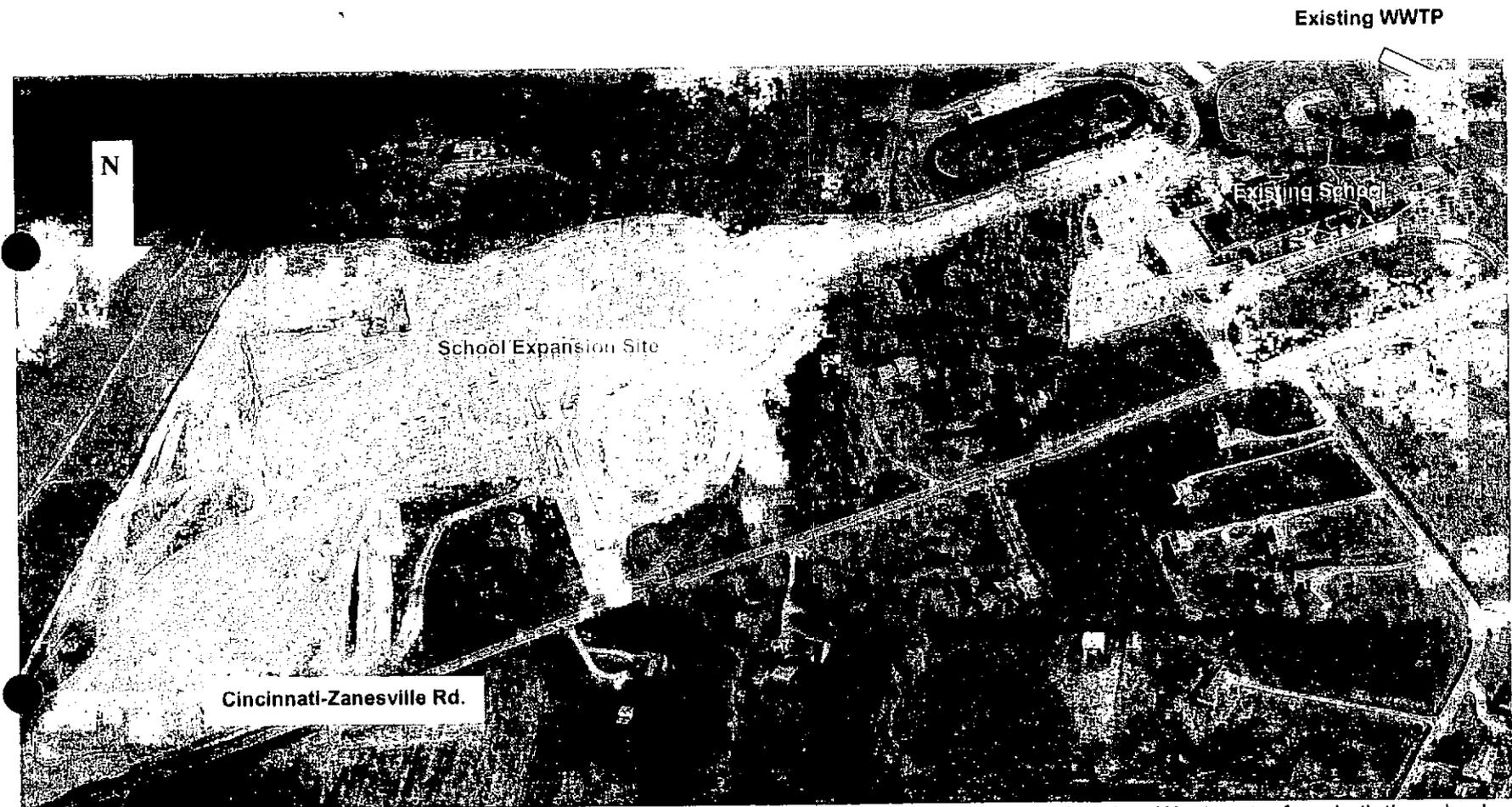


Figure 2. This is an old aerial photograph showing proximity of the existing WWTP to the school expansion site. Wastewater from both the school expansion site and existing school will be routed to the Village of Rushville wastewater treatment plant. The school district is proposing that wastewater from the bus garage and athletic field house at the existing school continues to be routed into the existing WWTP for another two years. This proposal includes down-sizing the existing WWTP to manage the reduced wastewater flow.