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State of Ohio Environmental Protection Agency

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Central District Office

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Columbus, OH 43216-1049

Certified Mail #91 7108 2133 3932 74449 8157

June 29, 2009

Mr. Steve Mazzi, Superintendent
Big Walnut Local Schools
P.O. Box 218
Galena, OH 43021

**Re: Hylen Souders Elementary School
NPDES permit: 4PT00125**

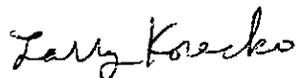
Dear Mr. Mazzi:

This letter serves as a "Notice of Violation" for the NPDES permit violations and compliance schedule violations listed in the attached Reconnaissance Inspection Report for the sewage treatment plant serving the Hylen Souders Elementary School located at 4121 Miller-Paul Road in Harlem Township, Delaware County, Ohio.

There are several items in the Attachment section of the report **which require a written response. Please respond in writing within 30 days of the receipt of this letter/report.**

Should you have any questions, please call me at 614-728-3846.

Sincerely,



Larry Korecko
Environmental Specialist
Compliance and Enforcement
Division of Surface Water
Central District Office

c: Nathan Coey, contract operator

LK/nsm Hylen Souder School 5-29-09 cover letter

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

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
4PT00125	OH0136255	05/29/2009	R	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Hulen Souders Elementary School (Big Walnut School District) 4121 Miller Paul Road Harlem Township, Delaware County, Ohio		12/01/06
	Exit Time	Permit Expiration Date
		11/30/11

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Nathan Coey, contract operator	740-817-2121
Name, Address and Title of Responsible Official	Phone Number
Steve Mazzi, District Superintendent Big Walnut Local Schools, P.O.Box 218, Galena, OH 43021	740-965-3010

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>M*</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N/A</u> Laboratory	<u>U*</u> Compliance Schedules
<u>M*</u> Operations & Maintenance	<u>M*</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>M*</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u> </u> Other
<u>N</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

- Indicate how school district will deal with deteriorating sand filter walls
- Permit to Install application now at Ohio EPA for dechlorination system. Please work with design engineer, contract operator, and Ohio EPA to resolve differences. This system is **needed to comply with NPDES permit limits. Dechlorination system installation will also satisfy "Compliance Schedule" violations.**
- Please check flow data submitted for 2008-2009. Are these high flows correct? If so why are flows so high?

Larry Korecko
Larry Korecko, Inspector, Ohio EPA, Central District Office

6-26-09
Date

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

6-26-09
Date

ATTACHMENT

Operation and Maintenance

The sewage treatment plant serving the Hylan Souders School is designed to treat 12,000 gallons per day. The plant has a trash trap, extended aeration, clarification, dosing to sand filters, chlorination, and a lift station to pump treated effluent to an unnamed tributary of Duncan Run which is about 1.2 miles away. An aerated sludge holding tank is provided so that excess sludge can be stored and then hauled to a larger sewage treatment plant for ultimate treatment.

The inspection of the plant on 5-29-09 was in conjunction with a site visit by a co-worker who is assigned to review the Permit to Install application that was submitted for a dechlorination unit which is required in the NPDES permit's "compliance schedule". This subject will be further explored later in the report.

The inspection noted that the haydite block used to construct the sand filters is very badly deteriorated in many places. **See the attached photo.** The block walls are in danger of falling or cracking such that partially treated sewage could run onto the ground and create a health hazard. **Please indicate in writing what the School District intends to do to eliminate this potentially serious problem.**

In talking with the contract operator, the school is now having its trash trap pumped once a month during the school year. This seems to have taken care of the grease problem that was hampering treatment. Please continue this practice.

Contract operator also stated that another blower motor is on order and should arrive this summer. It is important that the mechanical equipment at the sewage plant be replaced as the equipment ages. Also, needed spare parts should be readily available. **Please indicate if you have a tracking system for equipment and for spare parts.**

Compliance Schedule

The NPDES permit called for a Permit to Install (PTI) application to be submitted to Ohio EPA for a dechlorination unit by December 1, 2007. This PTI application was not received until March 30, 2009. An engineer in our Permit's section is currently reviewing the application. The compliance schedule called for the dechlorination system to be operational by December 1, 2008. **Please work with consultant, your contract operator, and Ohio EPA to see that dechlorination system can be operable by the new school year in September 2009.**

Effluent quality and violations

The monthly self monitoring discharge reports for the period September 2007 through May 2009 are attached on a separate page. Most of the violations are residual chlorine violations which the dechlorination system should resolve.

Flow Measurement

The flow data shows very high flows for many days in 2008 and 2009. Many of these reported flows exceed the sewage treatment plant design flow. **Please check to see if these flows are correct. Also are there roof drains, downspouts, or sump pump discharges connected into the sanitary sewer line? Please check this out and remove them if they are connected to sanitary. Please respond in writing.**

HYLEN SANDERS SCHOOL

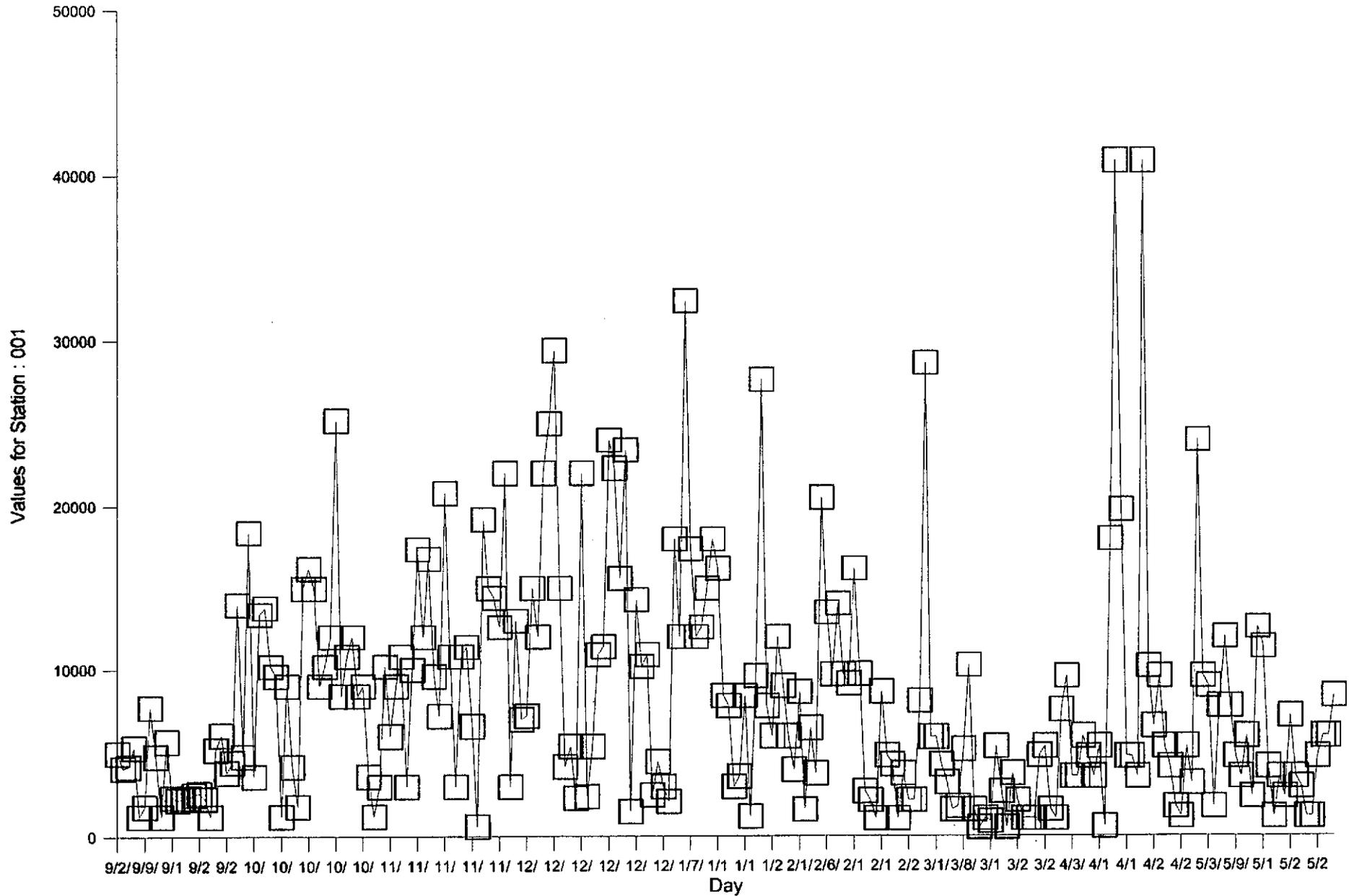
Get New Data

VIOLATIONS

SEPTEMBER 2007 - MAY 2009

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PT00125*AD	July 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	.54	7/14/2008
4PT00125*AD	December 2007	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.4	12/1/2007
4PT00125*AD	September 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	.51	9/26/2008
4PT00125*AD	May 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	.95	5/3/2008
4PT00125*AD	May 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.5	5/14/2008
4PT00125*AD	May 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.2	5/20/2008
4PT00125*AD	October 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	.76	10/4/2008
4PT00125*AD	October 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	.75	10/21/2008
4PT00125*AD	August 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.2	8/7/2008
4PT00125*AD	September 2007	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.41	9/1/2007
4PT00125*AD	September 2007	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.26	9/15/2007
4PT00125*AD	October 2007	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.2	10/7/2007
4PT00125*AD	October 2007	001	50060	Chlorine, Total Residu	1D Conc	0.5	.98	10/14/2007
4PT00125*AD	October 2007	001	50060	Chlorine, Total Residu	1D Conc	0.5	.52	10/21/2007
4PT00125*AD	June 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	1.28	6/5/2008
4PT00125*AD	June 2008	001	50060	Chlorine, Total Residu	1D Conc	0.5	.51	6/17/2008
4PT00125*AD	February 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	4.5	2/1/2008
4PT00125*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	7.	1/1/2009
4PT00125*AD	January 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	7.	1/15/2009
4PT00125*AD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.038	.18	5/10/2009
4PT00125*AD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.038	.11	5/15/2009
4PT00125*AD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.038	.19	5/22/2009
4PT00125*AD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.038	.05	5/28/2009
4PT00125*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	8.1	3/1/2009
4PT00125*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	8.1	3/15/2009

Hylen Souders Elem Sch 4PT00125*AD :
Period : 09/01/2008 to 05/31/2009 Parameter : Flow Rate (GPD)



HYLEN SANDERS SCHOOL

Get New Data

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