



**Environmental
Protection Agency**

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

September 27, 2010

RE: WEST HOLMES HIGH & MIDDLE SCHOOLS
OHIO EPA PERMIT 3PT00068
MONROE TOWNSHIP, HOLMES COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Mark VanSickle, Maintenance Supervisor
West Holmes Local Schools
28 West Jackson Street
Millersburg, OH 44654

Dear Mr. VanSickle:

On September 22, 2010, a site inspection was conducted at the above referenced facility at 10901 State Route 39, Monroe Township, Holmes County. The inspection was conducted by John Schmidt of this office and Kraig Bucklew of the Holmes County Health Department. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on September 23, 2009.

The system consists of a trash trap, aerated equalization tank, extended aeration system, upflow clarifier, lift station/dosing chamber, surface sand filtration, chlorine disinfection, dechlorination, and post-disinfection aeration. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The facility discharges to an unnamed tributary to Paint Creek west of the facility. No backup power is provided to the facility, however, the facility is provided with alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 42,000 gallons per day. The extended aeration plant operates continuously, with the sand filter operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. The lift station pumps were cycled and found in operable condition.
3. The content of the aeration tank had a slight earthy odor, chocolate brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. The plant color and aeration is an indicator of a properly operating aeration system.
4. The surface of the clarifier was clear. Effluent channels and weirs were in reasonable condition. The skimmer was operating at the time of the inspection.
5. Surface sand filters were reasonably clean and operable. The dosing pumps discharge to the filters when enough water accumulates to pump. The pumps were tested and found operable.
6. Chlorination and dechlorination systems were stocked with appropriate chemicals and operating at the time of the inspection. The tank contents were clear.

7. The final discharge pipe in the ravine west of the plant was not observed due to heavy vegetation.
8. Ohio EPA understands that Kevin Dean of Kevin's Backflow Service monitors the facility, and performs the routine sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

Clark Elementary School operates under Permit 3PT00068*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2009 through September 1, 2010, indicates the following apparent noncompliance of the terms and conditions of your NPDES permit

Limit Violations

No limit violations were noted for the reporting period reviewed.

Reporting Violations

No reporting code violations were noted for the reporting period reviewed.

The following reporting frequency violation was noted for the reporting period reviewed:

Station	Reportin g Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00665	Phosphorus, Total (P)	1/Month	1	0	02/01/2010

This reporting frequency violation should be explained, along with measures to ensure that it is not repeated. If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

The following additional violations were noted during the inspection:

1. **Operator of Record Designation** - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Part II, Item B requires you to designate an operator of record and notify Ohio EPA of the designated operator of record. Ohio EPA understands that West Holmes Local Schools contracts with Deans Backflow Services as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA.

Mark VanSickle, West Holmes Local Schools
West Holmes High and Middle Schools WWTP
September 27, 2010
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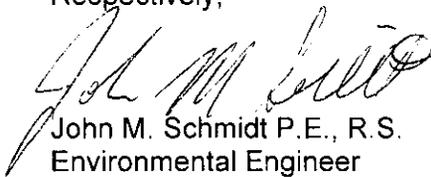
2. Outfall Signage – Pursuant to Part II, Item L of your NPDES permit, a permanent marker is to be located on the stream bank at each outfall regulated by this NPDES permit. Due to dense vegetative growth, Ohio EPA could not locate either the outfall or the permanent marker. Vegetative growth should be cleared so that any marker can be clearly seen and identified during the inspection.

Based on the above information, West Holmes Local Schools is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its West Holmes High and Middle Schools WWTP; however, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS:bo

enclosure: Operator of Record Notification Form, rev 02/2008

pc: Kraig Bucklew, Holmes County Health Department

File: Semipublic/Holmes/Monroe Twp/West Holmes High School