



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 12, 2012

CERTIFIED LETTER

Mr. Larry Claypool
Hardin-Houston Local School District
5300 Houston Road
Houston, Ohio

**RE: Houston High School, NPDES No. 1PT00104/OH0131997
Hardin Elementary School, NPDES No. 1PT00068/OH0096717
Compliance Evaluation Inspection – Shelby County**

Dear Mr. Claypool:

On February 28, 2012, Sandra Leibfritz conducted an inspection at Houston High School WWTP and Hardin Elementary School WWTP. Houston High School is located at 5300 Houston Road, Houston, Ohio and Hardin Elementary is located at 10297 State Route 47, Sidney, Ohio. You and Dave Ewing were representing the park. The aeration tank was rated as unsatisfactory and the clarifier was rated as marginal due to the wastewater treatment plant being septic. All other areas that were evaluated were rated as satisfactory. Details on these ratings may be found in the enclosed inspection report.

There are 7 items that require a response. For items number 1, 2 and 3, we ask for a response no later than March 23, 2012 and for items 4, 5, 6 and 7 we ask for a response no later than April 15, 2012. 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

MB/ca

cc: Don Freisthler
Dave Ewing
Shelby County Health Department

Permit #: 1PT00068*DD
 NPDES #: OH0096717



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*DD	OH0096717	02/28/2012	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Hardin Elementary School 10207 State Route 47 Sidney, OH 45365	1:00 p.m.	December 1, 2010
	Exit Time	Permit Expiration Date
	1:30 p.m.	November 30, 2015
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Dave Ewing dewing@houston.k12.oh.us		937.295.3010
Name(s), Address and Title(s) of Operator of Record		Phone Number(s)
Don Freisthler Freisthler Water Consulting, LLC 3268 Tawny Leaf Court Sidney, OH 45365 dfreisthler@woh.rr.com		937.638.9541
Name, Address and Title of Responsible Official		Phone Number
Larry Claypool, Superintendent Hardin-Houston Local School District 5300 Houston Road Houston, OH 45333 lclaypool@houston.k12.oh.us		937.295.3010

Comments/Status:

On February 28, 2012, I inspected the above facility. The elementary school has been torn down, graded and reseeded. The WWTP has been removed. The elementary school moved to Houston High School for consolidation as a K-12 facility. The facility does not discharge wastewater to Turtle Creek via field tile.

Ohio EPA Inspector	Ohio EPA Reviewer
Sandra D. Leibfritz Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date: 3/12/2012	Date: 3/14/12



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
1PT00104*BD	OH0131997	02/28/2012	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Houston High School 5300 Houston Road Houston, Ohio 45333	9:00 a.m.	July 1, 2007
	Exit Time	Permit Expiration Date
	12:45 p.m.	June 30, 2012
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Dave Ewing dewing@houston.k12.oh.us		937.295.3010
Name(s), Address and Title(s) of Operator of Record		Phone Number(s)
Don Freisthler Freisthler Water Consulting, LLC 3268 Tawny Leaf Court Sidney, OH 45365 dfreisthler@woh.rr.com		937.638.9541
Name, Address and Title of Responsible Official		Phone Number
Larry Claypool, Superintendent Hardin-Houston Local School District 5300 Houston Road Houston, OH 45333 lclaypool@houston.k12.oh.us		937.295.3010

Ohio EPA Inspector	Ohio EPA Reviewer
Sandra D. Leibfritz Date: 3/12/2012 Division of Surface Water Southwest District Office	Martyn Burt Date: 3/14/12 Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Average Daily Design Flow:	10,000 Gallons/Day
Plant Serves:	900 student & staff
Average Daily Flow: (Period of Review):	2,621 Gallons/Day (January through December 2011)
Method of flow monitoring:	Dosing pumps on sand filters
Type of alarms for plant:	Audio/visual

Comments/Status:

On November 19 2002, the Director of Ohio EPA issued Houston High School a PTI (No. 05-12388) for a new WWTP. The wastewater treatment plant consist of a trash trap, equalization basin, aeration tank, clarifier, surface sand filters, sludge holding tank, chlorination, dechlorination and post-aeration. The Hardin-Houston Local School District consolidated their schools to this location. The WWTP serves K-12 as of September 2011.

Pretreatment

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

Comments/Status:

Mike's Sanitation cleans the trash trap out in July 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. The alarm is tested once a week.
 Prior to the inspection, the operator (Don Freisthler) called. Mr. Freisthler reported that the WWTP receives heavy flows at lunch causing the plant not to operate well by pushing solids out to the sand filters. Mr. Freisthler said that he's adjusted the time that the arsenic filters backwash to 3 am in the morning to help reduce the flow to the plant during lunch time. The school has also contacted Choice One Engineering to look at upgrading the plant to include adding additional equalization volume and/or upflow filters. Mr. Ewing also reported that there is a surge of wastewater through the plant at lunch time of 3,000 gallons from 11:30 a.m. to 1:00 p.m.

**Secondary Treatment
(Aeration)**

Color of sludge: **Black**
 Quality of Sludge: **Medium**
 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 checked="" type="checkbox"/>	<input 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 (1)	<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 (1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Condition: good		

Maintenance of aerating equipment is...**Unsatisfactory**

Comments/Status:

The WWTP is septic. One of the motors to the blowers was not working. Dave Ewing reported that it was operating the night before. Dave will repair/replace the motor within the week.

**Secondary Treatment
(Settling)**

Clarity: **Solids Present**
 Condition of Weir: **Clean**
 Weir is level: **Yes**
 Effluent in weir: **greyish**
 Clarifier walls need scraped: **No**

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

Comments/Status:

Tertiary Treatment

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

Overall maintenance of components is: **Satisfactory**

Comments/Status:

Sand/solids mixture is placed in the dumpster for disposal at a sanitary landfill. One filter is blinded and the other is operational.

Sludge Handling/Storage Disposal

Hauler name: Mike's Sanitation
Disposal Site: 8810 Brockman Rd New Bremen, Ohio
Sludge wasted from: Clarifier
How often is sludge wasted: As needed, based on spin test
Sludge drying beds: **Yes** Sludge holding tank: **Yes**

Overall maintenance of components is: **Satisfactory**

Comments/Status:

Sludge is removed from the sludge holding tank every July

Operation & Maintenance

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... A
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... N/A
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)
Hardbound (pre-numbered pages)
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
 - ii. Laboratory results (unless documented on bench sheets)... N/A
 - iii. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the

permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

Laboratory results are documented on bench sheets (no initials of person making entries).
 Bench sheets states "calculation" versus "calibration."
 The certification for the NITS thermometer is February 9, 1979.
 The school uses a buffer of 7.0 S.U. and 10 S.U. for calibrating their pH meter.

Plant Discharge

Discharge point is a: **Stream**
 Name of discharge point: **Ninemile Creek**
 Discharge is visible: **Yes** Quality of Effluent: **Gray**

Comments/Status:

EFFLUENT LIMIT VIOLATIONS
(Period of Review: September 2011 through January 2012)

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

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
None Reported.					

Areas Requiring a Response

1. During the inspection, one of your blower motors to your aeration tank was not operating. Dave Ewing reported that it would be repaired/replaced within the week. No later than March 23, 2012, provide written notification that the motor has been repaired/replaced.

2. During the inspection, your aeration tank was septic. You will need to identify the cause of septicity. Was it due to inadequate aeration (i.e., motor inoperable) or is there a source (disinfection, floor cleaning chemicals, effluent from o/w separator) coming into the plant causing septicity? As discussed, was the plant reseeded? No later than March 23, 2012, provide written notification on what measures were taken or will be taken to resolve the septic conditions.

3. Laboratory results are recorded on bench sheets; however, the person who analyzes the sample is not initialing the results. Also, there is a column on the

bench sheet labeled as "Calculation." Mr. Ewing confirmed that this should be "Calibration." No later March 23, 2012, provide written notification that your bench sheet includes a column for initials and calibration.

4. Your certified NIST thermometer was last calibrated on February 9, 1979. Certified thermometers are required to be recertified every 5 years. No later than April 15, 2012, provide written notification that your thermometer has been recertified.
5. Mr. Ewing indicated that there is a surge of wastewater that comes through the plant at lunch. He reported that approximately 3,000 gallons flow to the plant from 11:30 a.m to 1:00 p.m. This should not be an issue considering that your equalization basin was designed with an effective volume of 6,000 gallons. I understand that you have contacted Choice One Engineering to assist you with this issue. I would recommend that you check your pumps to ensure that they are cycling correctly and that your floats are set at the correct level. Mr. Freisthler reported that these surges are causing operational problems. No later than April 15, 2012, provide written notification on the actions that you have taken or will take to address this issue.
6. The agriculture building is equipped with a trench drain at the bay door. The trench drain is located on the inside of the building. There is an oil/water separator connected to the trench drain that ultimately discharges to the wastewater treatment plant. This trench drain can only be used for for drippage of vehicles moving in and out of the bay doors. It cannot be used disposal of automotive fluids, chemicals and other liquids. I recommend that you post a sign that says "No dumping - goes to wastewater treatment plant." No later than April 15, 2012, provide written notification that the sign has been posted.
7. The sign to the wastewater treatment plant was on the inside of the fence. This sign must be moved to the outside of the fence. No later than April 15, 2012, provide written notification that the sign has been moved.

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MR LARRY CLAYPOOL
 HARDIN-HOUSTON LOCAL SCHOOL DISTRICT
 5300 HOUSTON ROAD
 HOUSTON, OHIO

see reverse for instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR LARRY CLAYPOOL
 HARDIN-HOUSTON LOCAL SCHOOL DISTRICT
 5300 HOUSTON ROAD
 HOUSTON, OHIO

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Barbara Hicks*

- Agent
 Addressee

B. Received by (Printed Name)

BARBARA HICKS

C. Date of Delivery

3/15/12

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
 (Transfer from service label)

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