

BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO E.P.A.  
FEB 19 2013

ENTERED DIRECTOR'S JOURNAL

In the matter of:

Frontier Local School District  
44870 State Route 7  
New Matamoras, Ohio 45767

:  
:  
:  
:

Director's Final Findings  
and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to Frontier Local School District ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 6111.03, and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and its successors in interest liable under Ohio law.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6111 and the rules promulgated there under.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent owns and operates a wastewater treatment plant ("WWTP") located at 44870 State Route 7, New Matamoras, Washington County, 45767.
2. Respondent holds a valid, unexpired, non-major National Pollutant Discharge Elimination System ("NPDES") permit, number 0PT00005\*FD, for the discharges from the WWTP.
3. Respondent discharges to "waters of the state" as defined by ORC Section 6111.01.

4. This document does not modify NPDES Permit No. OPT00005\*FD. The purpose of this document is to correct a condition of noncompliance with NPDES Permit No. OPT00005\*FD and not to alter said permit.
5. Pursuant to ORC Section 6111.04(C), no person to whom a permit has been issued shall place or discharge, or cause to be placed or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit.
6. Pursuant to ORC Section 6111.07(A), no person shall violate or fail to perform any duty imposed by ORC Sections 6111.01 to 6111.08 or violate any order, rule, or term or condition of a permit issued or adopted by the Director of Ohio EPA pursuant to those sections. Each day of violation is a separate offense.
7. Respondent violated terms and conditions of its NPDES permit on numerous occasions as cited in Attachment I. Each violation cited in Attachment I constitutes a separate violation of ORC Sections 6111.04 and 6111.07. Attachment I is hereby incorporated into these Findings and Orders as if fully stated herein.
8. The Ohio EPA has sent Respondent at least two (2) Notice of Violations ("NOVs") in an effort to address the compliance issues at the WWTP. Attachment II is Respondent's NOV letters. Attachment II is hereby incorporated into these Findings and Orders as if fully stated herein.
9. In May 2010, Respondent installed a coarse bubbler diffuser in the WWTP to aid the aeration system.
10. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the PTI requirements of Ohio Administrative Code ("OAC") Chapter 3745-42.
11. Compliance with the ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.
12. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

## V. ORDERS

The Director hereby issues the following Orders:

1. Respondent shall not cause, permit or allow the installation or modification of a disposal system at any location in Ohio without first receiving a permit to install (PTI) or plan approval from the Director as required by OAC Rule 3745-42-02 and ORC 6111.45.
2. Respondent shall achieve compliance with the final effluent limitations of its currently-effective NPDES permit, and any successor permit, as expeditiously as practicable, but not later than 270 days after the effective date of these Orders.
3. Respondent shall pay the amount of five thousand dollars (\$5,000) in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 6111. Within thirty (30) days after the effective date of these Orders, payment to Ohio EPA shall be made by an official check made payable to "Treasurer, State of Ohio". The official check shall be submitted to Carol Butler, or her successor, together with a letter identify the Respondent, to:

Office of Fiscal Administration  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, Ohio 43216-1049

A copy of the check shall be sent to Mark Mann, Environmental Manager, Storm Water and Enforcement Section, or his successor, at the following address:

Ohio EPA  
Division of Surface Water  
P.O. Box 1049  
Columbus, Ohio 43216-1049

## VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is defined in OAC Rule 3745-33-03(D)(1) for a corporation, OAC Rule 3745-33-03(D)(2) for a partnership, OAC Rule 3745-33-03(D)(3) for a sole proprietorship, and OAC Rule 3745-33-03(D)(4) for a municipal, state, or other public facility.

#### **VII. OTHER CLAIMS**

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to activities occurring on or at the site.

#### **VIII. OTHER APPLICABLE LAWS**

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

#### **IX. MODIFICATIONS**

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

#### **X. RESERVATION OF RIGHTS**

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XI of these Orders.

#### **XI. WAIVER**

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

**XII. EFFECTIVE DATE**

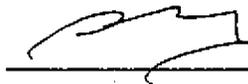
The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

**XIII. SIGNATORY AUTHORITY**

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

**IT IS SO ORDERED AND AGREED:**

**Ohio Environmental Protection Agency**



\_\_\_\_\_  
Scott J. Nally  
Director

2/15/13  
Date

**IT IS SO AGREED:**

**Frontier Local School District**



\_\_\_\_\_  
Signature

1-23-13  
Date

Bruce A Kidder  
Printed or Typed Name

Superintendent  
Title

# Attachment 1

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Unit/Type	Limit	Reported Value	Violation Date
OPT00005*ED	May 2008	001	31616	Fecal Coliform	30D Conc	200	5076.	5/1/2008
OPT00005*ED	May 2008	001	31616	Fecal Coliform	7D Conc	400	5076.	5/15/2008
OPT00005*ED	June 2008	001	31616	Fecal Coliform	30D Conc	200	923.	6/1/2008
OPT00005*ED	June 2008	001	31616	Fecal Coliform	7D Conc	400	923.	6/15/2008
OPT00005*ED	July 2008	001	00530	Total Suspended Solids	30D Conc	30	36.	7/1/2008
OPT00005*ED	July 2008	001	31616	Fecal Coliform	30D Conc	200	600.	7/1/2008
OPT00005*ED	July 2008	001	31616	Fecal Coliform	7D Conc	400	600.	7/15/2008
OPT00005*ED	August 2008	001	00530	Total Suspended Solids	30D Conc	30	37.	8/1/2008
OPT00005*ED	September 2008	001	00530	Total Suspended Solids	30D Conc	30	36.	9/1/2008
OPT00005*ED	September 2008	001	00400	pH	1D Conc	6.5	6.	9/11/2008
OPT00005*ED	February 2009	001	31616	Fecal Coliform	30D Conc	1000	7461.	2/1/2009
OPT00005*ED	February 2009	001	00400	pH	1D Conc	6.5	5.7	2/12/2009
OPT00005*ED	February 2009	001	31616	Fecal Coliform	7D Conc	2000	7461.	2/15/2009
OPT00005*ED	March 2009	001	00530	Total Suspended Solids	30D Conc	30	44.	3/1/2009
OPT00005*ED	March 2009	001	31616	Fecal Coliform	30D Conc	1000	1538.	3/1/2009
OPT00005*ED	March 2009	001	00400	pH	1D Conc	6.5	5.3	3/13/2009
OPT00005*ED	April 2009	001	00530	Total Suspended Solids	30D Conc	30	100.	4/1/2009
OPT00005*ED	April 2009	001	31616	Fecal Coliform	30D Conc	1000	3917.	4/1/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.5	4/8/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.6	4/9/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.9	4/12/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	5.7	4/19/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.8	4/21/2009
OPT00005*ED	April 2009	001	00530	Total Suspended Solids	1D Conc	45	100.	4/22/2009
OPT00005*ED	April 2009	001	31616	Fecal Coliform	7D Conc	2000	3917.	4/22/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.4	4/22/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.5	4/28/2009
OPT00005*ED	April 2009	001	00400	pH	1D Conc	6.5	4.5	4/28/2009
OPT00005*ED	May 2009	001	00530	Total Suspended Solids	30D Conc	30	132.	5/1/2009
OPT00005*ED	May 2009	001	00400	pH	1D Conc	6.5	4.6	5/4/2009
OPT00005*ED	May 2009	001	00400	pH	1D Conc	6.5	4.7	5/12/2009
OPT00005*ED	May 2009	001	00530	Total Suspended Solids	1D Conc	45	132.	5/21/2009
OPT00005*ED	May 2009	001	00400	pH	1D Conc	6.5	4.7	5/21/2009
OPT00005*ED	May 2009	001	00400	pH	1D Conc	6.5	4.8	5/27/2009
OPT00005*ED	June 2009	001	00530	Total Suspended Solids	30D Conc	30	56.	6/1/2009
OPT00005*ED	June 2009	001	31616	Fecal Coliform	30D Conc	200	3100.	6/1/2009
OPT00005*ED	June 2009	001	00400	pH	1D Conc	6.5	6.2	6/3/2009
OPT00005*ED	June 2009	001	00400	pH	1D Conc	6.5	5.9	6/10/2009
OPT00005*ED	June 2009	001	00400	pH	1D Conc	6.5	5.7	6/18/2009
OPT00005*ED	June 2009	001	31616	Fecal Coliform	7D Conc	400	3100.	6/22/2009
OPT00005*ED	June 2009	001	00400	pH	1D Conc	6.5	5.9	6/24/2009
OPT00005*ED	June 2009	001	00530	Total Suspended Solids	1D Conc	45	56.	6/28/2009
OPT00005*ED	June 2009	001	00400	pH	1D Conc	6.5	5.7	6/28/2009
OPT00005*ED	July 2009	001	00530	Total Suspended Solids	30D Conc	30	56.	7/1/2009
OPT00005*ED	July 2009	001	00400	pH	1D Conc	6.5	5.5	7/1/2009
OPT00005*ED	July 2009	001	00400	pH	1D Conc	6.5	5.3	7/8/2009
OPT00005*ED	July 2009	001	00400	pH	1D Conc	6.5	5.3	7/14/2009
OPT00005*ED	July 2009	001	00400	pH	1D Conc	6.5	5.4	7/15/2009
OPT00005*ED	July 2009	001	00400	pH	1D Conc	6.5	5.6	7/20/2009
OPT00005*ED	July 2009	001	00530	Total Suspended Solids	1D Conc	45	56.	7/24/2009
OPT00005*ED	August 2009	001	00530	Total Suspended Solids	30D Conc	30	88.	8/1/2009
OPT00005*ED	August 2009	001	50060	Chlorine, Total Residu	1D Conc	.038	.2	8/18/2009
OPT00005*ED	August 2009	001	00530	Total Suspended Solids	1D Conc	45	88.	8/24/2009
OPT00005*ED	September 2009	001	00530	Total Suspended Solids	30D Conc	30	47.	9/1/2009
OPT00005*ED	September 2009	001	00530	Total Suspended Solids	1D Conc	45	47.	9/8/2009
OPT00005*ED	September 2009	001	00400	pH	1D Conc	6.5	6.1	9/15/2009
OPT00005*ED	September 2009	001	00400	pH	1D Conc	6.5	5.6	9/22/2009
OPT00005*ED	October 2009	001	00400	pH	1D Conc	6.5	4.9	10/7/2009
OPT00005*ED	October 2009	001	00400	pH	1D Conc	6.5	5.3	10/9/2009
OPT00005*ED	October 2009	001	00400	pH	1D Conc	6.5	5.9	10/27/2009
OPT00005*ED	November 2009	001	00530	Total Suspended Solids	30D Conc	30	46.	11/1/2009
OPT00005*ED	November 2009	001	00530	Total Suspended Solids	1D Conc	45	46.	11/12/2009
OPT00005*ED	November 2009	001	00400	pH	1D Conc	6.5	5.9	11/20/2009

OPT00005*ED	November 2009	001	00400	pH	1D Conc	6.5	5.8	11/24/2009
OPT00005*ED	December 2009	001	00530	Total Suspended Solids	30D Conc	30	74.	12/1/2009
OPT00005*ED	December 2009	001	00400	pH	1D Conc	6.5	5.4	12/7/2009
OPT00005*ED	December 2009	001	00400	pH	1D Conc	6.5	5.2	12/11/2009
OPT00005*ED	December 2009	001	00400	pH	1D Conc	6.5	5.	12/15/2009
OPT00005*ED	December 2009	001	00530	Total Suspended Solids	1D Conc	45	74.	12/23/2009
OPT00005*ED	December 2009	001	50060	Chlorine, Total Residu	1D Conc	.038	.1	12/23/2009
OPT00005*ED	December 2009	001	00400	pH	1D Conc	6.5	4.9	12/23/2009
OPT00005*ED	January 2010	001	00530	Total Suspended Solids	30D Conc	30	54.	1/1/2010
OPT00005*ED	January 2010	001	00530	Total Suspended Solids	1D Conc	45	54.	1/13/2010
OPT00005*ED	January 2010	001	00400	pH	1D Conc	6.5	5.3	1/26/2010
OPT00005*ED	January 2010	001	00400	pH	1D Conc	6.5	6.3	1/29/2010
OPT00005*ED	February 2010	001	00530	Total Suspended Solids	30D Conc	30	39.	2/1/2010
OPT00005*ED	February 2010	001	00400	pH	1D Conc	6.5	6.1	2/3/2010
OPT00005*ED	February 2010	001	00400	pH	1D Conc	6.5	5.4	2/9/2010
OPT00005*ED	June 2010	001	00530	Total Suspended Solids	30D Conc	30	45.	6/1/2010
OPT00005*ED	June 2010	001	31616	Fecal Coliform	30D Conc	200	661.	6/1/2010
OPT00005*ED	June 2010	001	31616	Fecal Coliform	7D Conc	400	661.	6/22/2010
OPT00005*ED	August 2010	001	31616	Fecal Coliform	30D Conc	200	1438.	8/1/2010
OPT00005*ED	August 2010	001	31616	Fecal Coliform	7D Conc	400	1438.	8/8/2010
OPT00005*ED	November 2010	001	00530	Total Suspended Solids	30D Conc	30	52.	11/1/2010
OPT00005*ED	November 2010	001	00530	Total Suspended Solids	1D Conc	45	52.	11/18/2010
OPT00005*ED	December 2010	001	00530	Total Suspended Solids	30D Conc	30	44.	12/1/2010
OPT00005*ED	December 2010	001	00400	pH	1D Conc	6.5	6.	12/7/2010
OPT00005*ED	December 2010	001	00400	pH	1D Conc	6.5	6.	12/14/2010
OPT00005*ED	December 2010	001	00400	pH	1D Conc	6.5	6.	12/28/2010
OPT00005*ED	January 2011	001	31616	Fecal Coliform	30D Conc	1000	1254.	1/1/2011
OPT00005*ED	January 2011	001	00400	pH	1D Conc	6.5	6.	1/25/2011
OPT00005*ED	February 2011	001	00530	Total Suspended Solids	30D Conc	30	82.	2/1/2011
OPT00005*ED	February 2011	001	00400	pH	1D Conc	6.5	6.2	2/2/2011
OPT00005*ED	February 2011	001	00400	pH	1D Conc	6.5	6.1	2/10/2011
OPT00005*ED	February 2011	001	00530	Total Suspended Solids	1D Conc	45	82.	2/18/2011
OPT00005*ED	March 2011	001	00530	Total Suspended Solids	30D Conc	30	44.	3/1/2011
OPT00005*ED	March 2011	001	00400	pH	1D Conc	6.5	5.4	3/17/2011
OPT00005*ED	April 2011	001	00530	Total Suspended Solids	30D Conc	30	42.	4/1/2011
OPT00005*ED	August 2011	001	00530	Total Suspended Solids	30D Conc	30	100.	8/1/2011
OPT00005*ED	August 2011	001	00530	Total Suspended Solids	1D Conc	45	100.	8/18/2011
OPT00005*ED	September 2011	001	00400	pH	1D Conc	6.5	5.9	9/13/2011
OPT00005*ED	September 2011	001	00400	pH	1D Conc	6.5	6.2	9/20/2011
OPT00005*ED	September 2011	001	00400	pH	1D Conc	6.5	5.9	9/28/2011
OPT00005*FD	November 2011	001	00530	Total Suspended Solids	30D Conc	30	52.	11/1/2011
OPT00005*FD	November 2011	001	00530	Total Suspended Solids	7D Conc	45	52.	11/1/2011
OPT00005*FD	November 2011	001	00400	pH	1D Conc	6.5	4.7	11/3/2011
OPT00005*FD	December 2011	001	00530	Total Suspended Solids	30D Conc	30	44.	12/1/2011
OPT00005*FD	December 2011	001	00400	pH	1D Conc	6.5	5.7	12/5/2011
OPT00005*FD	December 2011	001	00400	pH	1D Conc	6.5	5.4	12/14/2011
OPT00005*FD	December 2011	001	00400	pH	1D Conc	6.5	4.7	12/21/2011
OPT00005*FD	December 2011	001	00400	pH	1D Conc	6.5	4.9	12/28/2011
OPT00005*FD	January 2012	001	00530	Total Suspended Solids	30D Conc	30	51.	1/1/2012
OPT00005*FD	January 2012	001	00400	pH	1D Conc	6.5	4.6	1/4/2012
OPT00005*FD	January 2012	001	00530	Total Suspended Solids	7D Conc	45	51.	1/8/2012
OPT00005*FD	January 2012	001	00400	pH	1D Conc	6.5	5.6	1/10/2012
OPT00005*FD	January 2012	001	00400	pH	1D Conc	6.5	5.8	1/20/2012
OPT00005*FD	February 2012	001	00530	Total Suspended Solids	30D Conc	30	37.	2/1/2012
OPT00005*FD	April 2012	001	00530	Total Suspended Solids	30D Conc	30	34.	4/1/2012
OPT00005*FD	May 2012	001	00530	Total Suspended Solids	30D Conc	30	73.	5/1/2012
OPT00005*FD	May 2012	001	00400	pH	1D Conc	6.5	6.2	5/9/2012
OPT00005*FD	May 2012	001	00400	pH	1D Conc	6.5	4.2	5/15/2012
OPT00005*FD	May 2012	001	00530	Total Suspended Solids	7D Conc	45	73.	5/22/2012
OPT00005*FD	May 2012	001	00400	pH	1D Conc	6.5	3.6	5/24/2012
OPT00005*FD	June 2012	001	00530	Total Suspended Solids	30D Conc	30	42.	6/1/2012
OPT00005*FD	August 2012	001	00530	Total Suspended Solids	30D Conc	30	42.	8/1/2012
OPT00005*FD	August 2012	001	31616	Fecal Coliform	30D Conc	200	692.	8/1/2012
OPT00005*FD	August 2012	001	31616	Fecal Coliform	7D Conc	400	692.	8/22/2012
OPT00005*FD	September 2012	001	00530	Total Suspended Solids	30D Conc	30	39.	9/1/2012

66

# Attachment 2



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 325-6490  
www.epa.state.oh.us

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

April 6, 2010

**Re:** Washington County  
Frontier Local Schools  
Self-Monitoring Report Violations  
Ohio EPA Permit No. OPT00005\*ED  
NPDES Permit No. OH0059323  
Correspondence (PWW)

Mr. Troy Thacker, Superintendent  
Frontier Local School District  
44870 State Route 7  
New Matamoras, Ohio 45767

Dear Mr. Thacker:

We have received your self-monitoring reports covering the months of October through December 2009 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance and/or deficiencies are as follows:

Outfall	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	pH	1D Conc	6.5	4.9	10/7/2009
001	pH	1D Conc	6.5	5.3	10/9/2009
001	pH	1D Conc	6.5	5.9	10/27/2009
001	Total Suspended Solids	30D Conc	30	46.	11/1/2009
001	Total Suspended Solids	1D Conc	45	46.	11/12/2009
001	pH	1D Conc	6.5	5.9	11/20/2009
001	pH	1D Conc	6.5	5.8	11/24/2009
001	Total Suspended Solids	30D Conc	30	74.	12/1/2009
001	pH	1D Conc	6.5	5.4	12/7/2009
001	pH	1D Conc	6.5	5.2	12/11/2009
001	pH	1D Conc	6.5	5.	12/15/2009
001	pH	1D Conc	6.5	4.9	12/23/2009
001	Total Suspended Solids	1D Conc	45	74.	12/23/2009
001	Chlorine, Total Residual	1D Conc	.038	.1	12/23/2009

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

We have reviewed your report addressing the reasons for the above violations and the actions being taken to prevent further occurrences. Hopefully, these actions will prevent any recurrence so that enforcement action will not be required. No additional information is requested at this time.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "*Facility Pollution Prevention Guide*" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

If there are any questions, please contact me at (740) 380-5434.

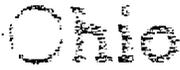
Sincerely,



Stephen Wells  
District Representative  
Division of Surface Water

SW/dh

- c: Rob McPeck, Frontier School District
- c: Greg Danver, Operator



**Environmental  
Protection Agency**

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

February 17, 2012

**Re:** Washington County  
Frontier Local Schools  
Self-Monitoring Report Violations  
Ohio EPA Permit OPT00005-ED  
NPDES Permit OH0059323  
Correspondence (PWW)

Mr. Troy Thacker, Superintendent  
Frontier Local School District  
44870 State Route 7  
New Matamoras, Ohio 45767

Dear Mr. Thacker:

We have received your self-monitoring reports covering the months of August through December 2011 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance and/or deficiencies are as follows:

Outfall	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Total Suspended Solids	30D Conc	30	100.	8/1/2011
001	Total Suspended Solids	1D Conc	45	100.	8/18/2011
001	pH	1D Conc	6.5	5.9	9/13/2011
001	pH	1D Conc	6.5	6.2	9/20/2011
001	pH	1D Conc	6.5	5.9	9/28/2011
001	Total Suspended Solids	30D Conc	30	52.	11/1/2011
001	Total Suspended Solids	7D Conc	45	52.	11/1/2011
001	pH	1D Conc	6.5	4.7	11/3/2011
001	Total Suspended Solids	30D Conc	30	44.	12/1/2011
001	pH	1D Conc	6.5	5.7	12/5/2011
001	pH	1D Conc	6.5	5.4	12/14/2011
001	pH	1D Conc	6.5	4.7	12/21/2011
001	pH	1D Conc	6.5	4.9	12/28/2011

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

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We have reviewed your report addressing the reasons for the above violations and the actions being taken to prevent further occurrences. Hopefully, these actions will prevent any recurrence so that enforcement action will not be required. No additional information is requested at this time.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's *"Facility Pollution Prevention Guide"* (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

If there are any questions, please contact me at (740) 380-5434.

Sincerely,



Stephen Wells  
District Representative  
Division of Surface Water

SW/dh

- c: Rob McPeck, Frontier School District
- c: Greg Danver, Operator