



NOTICE OF VIOLATION

August 1, 2013

Re: Barr Elementary
NPDES Permit No. 3PT00015*AD

Sheffield-Sheffield Lake City Schools
1824 Harris Road
Sheffield Village, OH 44054
Attn: Will Folger, Superintendent

Sheffield Middle School
NPDES Permit No. 3PT00088*CD

Dear Mr. Folger:

A reconnaissance inspection (RI) in October 2012 and subsequent review of your operation records (July 2012 to September 2012) and discharge monitoring reports indicate you are in violation of Ohio Administrative Code (OAC) Rules.

The RI and review of your records indicates the following:

Barr Elementary

1. In accordance with OAC Rule 3745-7-09(A)(2), the owner and operator of record (ORC) of a treatment works shall maintain or cause to be maintained operation and maintenance records. The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel. During the RI no operation and maintenance records were available on-site. The information was subsequently provided by your ORC.
2. In accordance with OAC Rule 3745-7-09(A)(3)(b), operation records shall at a minimum contain the dates and times of arrival and departure for the ORC and any other operator required by this chapter. A review of the operation records indicates the ORC did not consistently indicate times of arrival and rarely indicated times of departure.
3. In accordance with OAC Rule 3745-7-09(A)(3)(c), operation records shall at a minimum contain specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced. A review of the operation and maintenance records indicates a minimal amount of operation and maintenance activities were included in the facility log book.

Conversations with staff at the facility indicated the four regular pumps at the facility were out of service and being stored in the boiler room. Staff indicated a temporary pump had been in use for approximately a month and a half. A review of the records indicates there is no notation of the pumps being taken out of service.

4. In accordance with OAC Rule 3745-7-09(A)(3)(c), operation and maintenance records shall at a minimum contain records regarding the performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced. A review of the operation records indicates limited entries regarding the performance of preventative maintenance and repairs or requests for repair of the equipment were included in the facility log book.
5. In accordance with OAC Rule 3745-7-04(C)(3)(b) daily visits shall be performed by the owner, supplier, or their representative or agent five days per week and noted in the operational and maintenance records. The review of the operations records indicated daily visits were not being performed five days per week.

Sheffield Middle School

1. In accordance with OAC Rule 3745-7-09(A)(2), the owner and operator of record (ORC) of a treatment works shall maintain or cause to be maintained operation and maintenance records. The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel. During the RI no operation and maintenance records were available on-site. The log book was made available to Ohio EPA staff at the school administration building.
2. In accordance with OAC Rule 3745-7-09(A)(3)(b), operation records shall at a minimum contain the dates and times of arrival and departure for the ORC and any other operator required by this chapter. A review of the operation records indicates the ORC did not consistently indicate times of arrival and rarely indicated times of departure.
3. In accordance with OAC Rule 3745-7-09(A)(3)(c), operation records shall at a minimum contain specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced. A review of the operation and maintenance records indicates a minimal amount of operation and maintenance activities were included in the facility log book. A review of the file for this facility indicates there are significant problems with the facility meeting effluent limits however, there are no notations in the log book to indicate efforts are being made to correct issues with the facility.

4. In accordance with OAC Rule 3745-7-09(A)(3)(c), operation and maintenance records shall at a minimum contain records regarding the performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage conveyed or effluent produced. A review of the operation records indicates limited entries regarding the performance of preventative maintenance and repairs or requests for repair of the equipment were included in the facility log book. A notation is made that indicates a pump needs to be pulled out because it is broken at the bottom. The records do not indicate when or how the pump was fixed.
5. In accordance with OAC Rule 3745-7-04(C)(3)(b) daily visits shall be performed by the owner, supplier, or their representative or agent five days per week and noted in the operational and maintenance records. The review of the operations records indicated daily visits were not being performed five days per week.

Please provide a written response **within 15 days** of the date of this letter indicating the steps you will take to ensure compliance with the requirements above.

If you have any questions or comments, please feel free to contact me at (614) 728-1216.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Barienbrock for".

Andrew Barienbrock
Environmental Supervisor
Division of Drinking and Ground Water

cc: Christina Faith, Uni-Tech Environmental Services, Inc.
Don Daley, Uni-Tech Environmental Services, Inc.
DSW-NEDO
Operator File