



**Environmental
Protection Agency**

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

December 23, 2011

Stephen White, Owner
Jacksontown School
P.O. Box 201
Jacksontown, OH 43030

**Re: Jacksontown School
NPDES Permit 4PT00127/ OH0136409
Compliance Evaluation Inspection
Licking County**

Dear Mr. White:

On December 13, 2011, a Compliance Evaluation Inspection was conducted at the Jacksontown School WWTP. Present for the inspection were Tom Coleman, operator, Jacksontown School WWTP, Sheree Gossett-Johnson and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The following concerns were noted during the inspection:

- The air lift sludge return lines were not returning sludge from the clarifier back into the aeration tank. The operator must investigate the cause(s) of this problem and institute proper maintenance to ensure the air lift sludge return lines are working properly.
- Effluent discharge flow monitoring does not occur. Effluent discharge flows are estimated based on potable water usage at the school. The operator should contact me to discuss ways of providing appropriate effluent flow estimates for discharge monitoring reports rather than relying on potable water use records.
- There were numerous violations of frequency reporting for color, odor, and turbidity for August and September. The facility must ensure that proper reporting frequencies are observed.
- Once the operator/facility has received a "Preliminary Compliance Review" notice from Ohio EPA, the operator/facility must respond to me with an explanation and corrective action.

Stephen White, Owner
Jacksontown School
Page -2-

- The dechlorination chamber is covered by a temporary wooden lid that does not fit the opening. In order to assure that rainfall, debris, and other items do not fall into and foul the chamber, please install a properly fitting, removable cover.
- The operator of record must log both dates and times spent at the plant instead of just the date in the operator log book.
- Sand filter beds must be regularly maintained. A variety of debris and plant matter was found in both filter beds. Additionally, it is recommended that the flow splitter box leading into the sand filter be utilized to alternate flow between the sand filters. In this way one filter can be off line for cleaning, while the other filter is available to provide treatment. Also, the appropriate type and amount of sand must be present in the filter bed to assure proper treatment.
- Plants, debris, and sand removed from the sand filter beds must be properly bagged and disposed of instead of dumped next to the filter bed.

Please respond in writing within 30 days of the receipt of this letter outlining the steps you have taken to address the concerns highlighted in this inspection report. Inclusions of photographs to document improvements are acceptable in the response letter. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.ohio.gov.

Sincerely,



Paul Vandermeer
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

c: Tom Coleman, Operator, Jacksontown School WWTP

ec: Paul Vandermeer

PV/nsm Jacksontown School WWTP

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PT00127	OH0136409	CFI	S	A
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
12/13/2011	12:00 pm	1:00 pm	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Jacksontown School 9100 Jacksontown Rd. Jacksontown, OH	7/1/2011
	Permit Expiration Date
	6/30/2016
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Tom Coleman, Operator	(740) 624-5343
Name and Title of Responsible Official	Phone Number
Stephen White, Owner	(740) 522-1512

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	Effluent frequency violations numerous
U	Operations & Maintenance	Sludge return pipes were not functional, sand filters had significant vegetation growth, sand in filter did not appear to be the right texture/consistency for proper filtration and the quantity of sand in the filter appeared to be insufficient.
U	Facility Site Review	Vegetation and sand removed from filters was dumped alongside the filter, temporary cap on dechlorination chamber did not properly fit.
N	Collection System	
U	Flow Measurement	Estimated flow measurements need to be made of effluent exiting the plant.
S	Receiving Waters	
N	Laboratory	

Comments:

Signatures	
 12/15/11	 12/15/11

Compliance Data for Jacksontown Sch between 11/1/2010 to 12/1/2011

Summary

Permit Effluent Limit Violations: 2
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: * 63
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2011	001	E. coli	30D Conc	126	2420.	8/1/2011
August 2011	001	E. coli	7D Conc	284	2420.	8/15/2011

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
August 2011	001	Color, Severity	1/Day	1	0	08/06/2011
August 2011	001	Odor, Severity	1/Day	1	0	08/06/2011
August 2011	001	Turbidity, Severity	1/Day	1	0	08/06/2011
August 2011	001	Color, Severity	1/Day	1	0	08/07/2011
August 2011	001	Odor, Severity	1/Day	1	0	08/07/2011
August 2011	001	Turbidity, Severity	1/Day	1	0	08/07/2011
August 2011	001	Color, Severity	1/Day	1	0	08/13/2011
August 2011	001	Odor, Severity	1/Day	1	0	08/13/2011
August 2011	001	Turbidity, Severity	1/Day	1	0	08/13/2011
August 2011	001	Color, Severity	1/Day	1	0	08/14/2011
August 2011	001	Odor, Severity	1/Day	1	0	08/14/2011
August 2011	001	Turbidity, Severity	1/Day	1	0	08/14/2011
August 2011	001	Color, Severity	1/Day	1	0	08/20/2011

September 2011	001	Turbidity, Severity	1/Day	1	0	09/11/2011
September 2011	001	Color, Severity	1/Day	1	0	09/17/2011
September 2011	001	Odor, Severity	1/Day	1	0	09/17/2011
September 2011	001	Turbidity, Severity	1/Day	1	0	09/17/2011
September 2011	001	Color, Severity	1/Day	1	0	09/18/2011
September 2011	001	Odor, Severity	1/Day	1	0	09/18/2011
September 2011	001	Turbidity, Severity	1/Day	1	0	09/18/2011
September 2011	001	Color, Severity	1/Day	1	0	09/24/2011
September 2011	001	Odor, Severity	1/Day	1	0	09/24/2011
September 2011	001	Turbidity, Severity	1/Day	1	0	09/24/2011
September 2011	001	Color, Severity	1/Day	1	0	09/25/2011
September 2011	001	Odor, Severity	1/Day	1	0	09/25/2011
September 2011	001	Turbidity, Severity	1/Day	1	0	09/25/2011
September 2011	001	Color, Severity	1/Day	1	0	09/29/2011
September 2011	001	Odor, Severity	1/Day	1	0	09/29/2011
September 2011	001	Turbidity, Severity	1/Day	1	0	09/29/2011
September 2011	001	Color, Severity	1/Day	1	0	09/30/2011
September 2011	001	Odor, Severity	1/Day	1	0	09/30/2011
September 2011	001	Turbidity, Severity	1/Day	1	0	09/30/2011

*The facility has 1 missing data reports.

Station	Required Report Period	DMR Received
001	February 2011	No

of directing flow to both filters simultaneously. This will allow for maintenance on the unused sand filter while the other is online.

SECTION G: RECORD KEEPING

- a) Log book provided Y
- b) Format of log book: notebook
- c) Log book(s) kept onsite in an area protected from weather Y
- d) Log book contains the following:
 - i) Identification of treatment works N*
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 Y**
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) Y
 - iv) Laboratory results (unless documented on bench sheets) Y
 - v) Identification of person making log entries Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments: *Operator must identify treatment works in the operator log book. **Times of arrival and departure from the plant should be recorded in log book.

SECTION H: COLLECTION SYSTEM

- a) Percent combined system:..... 0%
- b) Any collection system overflows since last inspection NA
 CSO SSO
- c) Regulatory agency notified of overflows NA
- d) CSO O&M plan provided and implemented. NA
- e) CSOs monitored and reported in accordance with permit..... NA
- f) Portable pumps are used to relieve system NA
- g) Lift station alarms provided and maintained..... NA
- h) Lift stations equipped with permanent standby power or equivalent..... NA
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection. NA
- j) Any complaints received since last inspection of basement flooding NA
- k) Are any portions of the sewer system at or near capacity..... NA
- l) Are operations changed during high-flow events? NA

Comments:

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) NA
- b) If alternate procedures are used, are they properly approved? NA
- c) Analysis performed more frequently NA
 If yes, are results recorded in permittee's report? NA
- d) Commercial laboratory used: Y
 Name: Alloway
 Parameters analyzed: *
- e) Quality assurance manual provided and maintained NA
- f) Calibration and maintenance of instruments is satisfactory? Y
- g) Results of last U.S. EPA quality assurance NA
 Date:

Comments: *Alloway grabs and analyzes all samples for entity except for dissolved oxygen and temperature which are performed by operator using a sensor.

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No	No	No	No	No	No	clear	

Comments: Discharge pipe needs to be located and signage installed in accordance with the NPDES permit. Permittee may provide photographic evidence of exact outfall location and signage via e-mail to inspector.

SECTION M: MULTIMEDIA OBSERVATIONS

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories NA
- b) Do you notice staining or discoloration of soils, pavement or floors NA
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation NA
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks NA
- e) Do you notice any unusual odors or strong chemical smells NA
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities NA

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?