



**Environmental
Protection Agency**

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

August 21, 2012

**RE: Rockway School WWTP Inspection and
Notice of Violation
NPDES Permit 1PT00118*AD
Clark County**

Mr. Brian Kuhn
Assistant Superintendent
Clark-Shawnee Local School District
3680 Selma Road
Springfield, OH 45502

Dear Mr. Kuhn:

On August 10th, I inspected the wastewater treatment plant serving Rockway School. The inspection was in preparation for the renewal of the National Pollutant Discharge Elimination System (NPDES) permit that will expire on October 31st.

A review of your Discharge Monitoring Reports (DMRs) from July 2010 through June 2012 revealed the following reported violations:

Date	Parameter	Limit Type	Limit (mg/l)	Reported Value (mg/l)
December 2010	CBOD5	Mo. Avg.	10	15
January 1-7, 2011	Total Suspended Solids	Wk. Avg.	18	28
January 2011		Mo. Avg.	12	28
February 2011	CBOD5	Mo. Avg.	10	14
	Total Suspended Solids	Mo. Avg.	12	13
March 2011	Total Suspended Solids	Mo. Avg.		
April 2012	Nitrogen, Ammonia (NH3)	Mo. Avg.	3.0	4.0

While explanations have been previously provided for the violations in 2010 and 2011, our records show that you did not provide a notification or explanation for the ammonia violation in April 2012. Your NPDES permit requires you to notify this office of violations and provide explanations for their cause, remedies employed and plans to avoid violations from recurring. Please ensure that you meet this obligation for any future violations.

Staff preparing for the beginning of the new school year provided me access to the treatment plant. The plant was operating but not discharging, as would be expected

with the school still on summer break. The thin grey-ish appearance of the liquid in the aeration tank (known as mixed liquor) led me to believe that the microbiology in the system was dead for the lack of fresh sewage and was broken down by the constant mixing of aeration. Even the return from the bottom of the clarifier to the aeration tank was clear, indicating that there is likely a very small amount of solids in the system.

Although I expect to be back out to inspect the plant after school has been in session, I have the following observations from my August 10th visit for you to address:

Protection of Plant from Debris

I believe there is a risk of leaves from nearby trees and other debris (including that which might be thrown in) causing operational problems when they fall into the wastewater treatment plant. This is especially true over the UV disinfection tank. You may want to consider placing geotextile fabric over the grate covers (secured with zip ties) as a simple way to keep debris out of the tanks.

Equalization Tank

The contents of the equalization tank had a septic odor that was likely the result of there being no aeration/mixing. The blower/diffuser system for this tank needs to be checked to ensure the contents are always being properly aerated.

Sludge Holding Tank

The sludge holding tank was full but was also not being aerated. However, I did not notice any objectionable odor from this tank. I encourage you to decant as much clear liquid above the sludge level as possible before aerating the tank to maximize its available capacity for accepting wasted sludge from the clarifier.

Operator Log Book

I could not find an operator log book and on-site staff did not know of one being kept in the office. Please note that your NPDES permit requires you to maintain an operator log book on site. Having this record available allows Ohio EPA to determine that required oversight is being provided. I suggest you consider storing the operator log book inside one of the weather-proof control boxes. Please explain how you will address this very important issue.

Finally, please note that in the forthcoming NPDES permit renewal, the certified operator oversight requirement will be reduced from Class I to Class A. This change will now only require a Certified Class A operator to be on site for a minimum of one hour a week over at least two days.

Mr. Brian Kuhn
August 21, 2012
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Please provide me a written response to this inspection letter by September 14th addressing the items I have presented. If you have any questions concerning this letter or the attached inspection form, please call me at (937) 285-6095 or email me at matt.walbridge@epa.ohio.gov.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

MW/tf

Enclosure

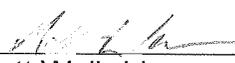
cc: Brenda Sweeney



Environmental
Protection Agency

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Southwest District Office

Section A: National Data System Coding					
Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
1PT00118*AD	OH0137731	8-10-12	C	S	2
Section B: Facility Info					
Name and Location of Facility Inspected			Entry Time	Permit Effective Date	
Clark-Shawnee Local School District Rockway Primary and Middle School 3500 West National Road Springfield, OH 45505			2:00 PM	11-1-07	
			Exit Time	Permit Expiration Date	
			2:30 PM	10-31-12	
Name(s) and Title(s) of On-Site Representatives			Phone Number(s)		
School Office Staff			-		
Name and Address of Operator of Record			Phone Number(s)		
Brenda Sweeney Bsweeney4@woh.rr.com			(937) 568-4534 (937) 605-2748 (cell)		
Name, Address and Title of Responsible Official			Phone Number		
Brian Kuhn – Assistant Superintendent Clark-Shawnee Local School District 3680 Selma Rd. Springfield, OH 45502			(937) 328-5378		
Ohio EPA Inspector			Ohio EPA Reviewer		
					
Matt Walbridge		8-21-12	Martyn Burt		8/21/12
Division of Surface Water		Date	Environmental Supervisor		Date
Southwest District Office			Division of Surface Water		
			Southwest District Office		

Average Daily Design Flow:	6,000 Gallons/Day
Plant Serves:	300 students/staff
Average Daily Flow: (Period of Review):	Approximately 800 Gallons/Day (September 2011 – May 2012) school year
Method of flow monitoring:	Weir/ultrasonic
Type of alarms for plant:	High water level

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Not Determined**
 Maintenance of pretreatment components is: **Not Evaluated**

Comments/Status:

Equalization tank had a septic odor and there was no evidence of mixing/aeration.

**Secondary Treatment
(Aeration)**

Color of sludge: **Other**
 Quality of Sludge: **Thin**
 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 type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Skimmers are operating	<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	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Good**

Comments/Status:

Aeration in the first tank was very light. Liquid appeared almost clear. Aeration in the second basin was robust but color was a very light grey-ish tan. Return activated sludge was clear.

**Secondary Treatment
(Settling)**

Clarity: **Cloudy**
 Condition of Overflow Weir: **Clean**
 Weir is level: **Yes**
 Effluent in weir: **Other**
 Clarifier walls need scraped: **Unknown**

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

Comments/Status:

There was no discharge from the clarifier. The water at the surface was somewhat turbid. There was a lot of scum build-up behind the influent weir.

Tertiary Treatment

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

Overall maintenance of components is: **Good**

Comments/Status:

It appeared that only one of the up-flow media clarifiers was on-line. The surface sand filters looked good (right one in use). The UV lamp indicator lights were lit but it was unclear whether the lamps were on. There was a lot of leaves in this tank that might interfere with light transmittance if leaves cling to the bulbs. Post aeration was vigorous

Sludge Handling/Storage Disposal

Hauler name: **Unknown**
 Disposal Site: **City of Springfield WWTP**
 Sludge wasted from: **Sludge Holding Tank**
 How often is sludge wasted: **Approx. once per year**
 Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Fair**

Comments/Status:

The sludge holding tank was fairly full. There was no aeration/mixing but I didn't notice an objectionable odor.

Plant Discharge

Discharge point is a: **Ravine**
Name of discharge point: **Unnamed tributary of Rock Run**
Discharge is visible: **No** Quality of Effluent: **Other**

Comments/Status:

No discharge (school not in session)

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

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January 2011		Monthly Average	12	28
February 2011	CBOD5	Monthly Average	10	14
	Total Suspended Solids	Monthly Average	12	13
March 2011	Total Suspended Solids	Monthly Average		16
April 2012	Nitrogen, Ammonia (NH3)	Monthly Average	3.0	4.0