Ohio | Environmental Protection Agency

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

September 25, 2012

**RE: Greenon High School and Hustead Elementary School Wastewater Treatment Plant Inspections Notice of Violation**

Mr. Ryan Jenkins
Treasurer
Greenon Local School District
500 Enon Xenia Rd
Enon, OH 45323

Dear Mr. Jenkins:

On August 29th, I met with Brenda and Joe Sweeney to inspect the wastewater treatment plants serving Greenon High School and Hustead Elementary School.

I previously identified reported violations for Greenon High School in my August 21st letter to you. A review of your Discharge Monitoring Reports (DMRs) for the period of February 2008 through July 2012 revealed the following reported violations at Hustead Elementary School:

**Summary of Limit Violations**

| Date | | Parameter | Limit Type | Limit | Reported Value |
|---|---|---|---|---|---|
| 2008 | August 1-8 | Total Suspended Solids | Mo. Avg. (mg/l) | 12.0 | 23. |
| | August | | Weekly Avg. (mg/l) | 18.0 | 23. |
| | September | Fecal Coliform | Mo. Avg. (mg/l) | 1000 | 2730. |
| | September 8-14 | | Weekly Avg. (mg/l) | 2000 | 2730. |
| | November | Ammonia Nitrogen | Mo. Avg. (mg/l) | 3.0 | 18.8 |
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| 2009 | January | Total Suspended Solids | Mo. Avg. (mg/l) | 12.0 | 15.5 |
| | | Ammonia Nitrogen | Mo. Avg. (mg/l) | 3.0 | 16.1 |
| | January 15-21 | Ammonia Nitrogen | Weekly Avg. (mg/l) | 4.5 | 16.1 |
| | February | Total Suspended Solids | Mo. Avg. (mg/l) | 12.0 | 14.5 |
| | | Ammonia Nitrogen | Mo. Avg. (mg/l) | 3.0 | 35.8 |
| | | | Mo. Avg. (Kg/day) | 0.11 | .17615 |
| | | CBOD 5 day | Mo. Avg. (mg/l) | 10.0 | 33. |
| | February 8-14 | Ammonia Nitrogen | Weekly Avg. (mg/l) | 4.5 | 35.8 |
| | | Ammonia Nitrogen | Weekly Avg. (Kg/day) | 0.17 | .17615 |
| | | CBOD 5 day | Weekly Avg. (mg/l) | 15.0 | 33. |

**Southwest District Office**
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

| Summary of Limit Violations | | | | | |
|---|---|---|---|---|---|
| Date | | Parameter | Limit Type | Limit | Reported Value |
| 2009 | March | Ammonia Nitrogen | Mo. Avg. (mg/l) | 3.0 | 42.8 |
| | | | Mo. Avg. (Kg/day) | 0.11 | .2268 |
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| | May | Ammonia Nitrogen | Mo. Avg. (mg/l) | 1.0 | 1.5 |
| | June | Ammonia Nitrogen | Mo. Avg. (mg/l) | 1.0 | 2.48 |
| | June 8-14 | | Weekly Avg. (mg/l) | 1.5 | 2.48 |
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| | November | Ammonia Nitrogen | Mo. Avg. (mg/l) | 3.0 | 8.4 |
| | November 15-21 | | Weekly Avg. (mg/l) | 4.5 | 8.4 |
| 2012 | May | Ammonia Nitrogen | Mo. Avg. (Kg/day) | 0.04 | .05299 |

| Summary of Frequency Violations | | | | | |
|---|---|---|---|---|---|
| Reporting Period | | Parameter | Sample Frequency | Expected | Reported |
| 2008 | May 15-21 | Residual Chlorine | 1/2Weeks | 1 | 0 |
| | May 22-28 | Water Temperature | 1/Week | 1 | 0 |
| | | Dissolved Oxygen | 1/Week | 1 | 0 |
| 2009 | July 1-7 | Water Temperature | 1/Week | 1 | 0 |
| | | Dissolved Oxygen | 1/Week | 1 | 0 |
| | October 1-7 | Residual Chlorine | 1/2Weeks | 1 | 0 |
| | October 15-21 | Residual Chlorine | 1/2Weeks | 1 | 0 |

Because the violations, except the ammonia loading limit violation in May 2012, occurred several years ago, I do not expect you to provide explanations for their causes. However, it is important for you to be aware of the need for you to provide explanations of the cause of the violations, remedies employed, and plans to avoid violations from recurring. This could be done by including comments with the discharge monitoring report (DMR) associated with a violation. Please ensure that you do this for any future violations.

Findings from my inspections are as follows:

**Hustead Elementary**

1. The sand in the slow surface sand filters needs to be leveled as wastewater was observed to be channeling over to the wall which likely results in short-circuiting to the underdrain. Placing marks on the sides of the filter wall can aid staff in ensuring the sand is level so that wastewater is evenly distributed over the surface of the sand filter.

2. Timers were reset to correspond to the actual time. Please ensure timers are checked and adjusted so that proper aeration is provided at the times of day when it is necessary/effective.

3. The mixed liquor in the aeration tanks looked very thin. I encourage you to consider "seeding" the plant with activated sludge from another wastewater treatment plant to ensure there is an effective population of microbes in the wastewater treatment plant; especially at the beginning of the school year.

4. Flow is measured using an elapsed run time meter. I recommend that the pump rate be checked to ensure that reported flows are accurate. Please inform me what the pump rate is.

**Greenon High School**

1. Since flows are measured using an elapsed run-time meter on the sand filter dosing pumps, I suggested that the pump rates be checked by measuring the time it takes to fill the sand filter splitter box (with the outlets temporarily plugged). Ms. Sweeney reported that the pumping rates of the two pumps are 35 and 50 gallons per minute based on the average of two runs. It is my understanding that the pumps operate alternately which should allow you to use an average pump rate of 42.5 gpm

   Ms. Sweeney indicated that she planned to review her records for the run times to verify the daily discharge flows in light of the school district's plans to expand the school. Please inform me of the findings from her evaluation. I recommend reviewing mid-week records (Tuesday through Friday) for determining daily flow.

2. The sludge return line on one of the clarifier hoppers was not operating and was later determined by Ms. Sweeney to be clogged and was repaired. Fortunately the return line serving the second hopper was operating. It is very important for the sludge return lines to be kept operational as they are crucial to the proper operation of the wastewater treatment system. The operator log should document conditions such as a clogged return.

3. As was the case at Hustead, the sand filters need to be leveled to avoid short-circuiting. Ms. Sweeney indicated that school staff has been instructed on the importance of keeping the sand leveled.

4. The final effluent was turbid which may be caused by the recently repaired post aeration diffusor stirring up settled solids in the dechlorination/post aeration tank. These solids could be caused by the observed solids accumulated on the sand filters which are likely the result of one of the sludge return lines being clogged compounded by the high amount of solids (thick mixed liquor) I noted in the aeration tanks. As you can see, there are many interdependencies that can impact the quality of the effluent which makes it important to ensure maintenance needs are identified and corrected quickly.

5. Some of the grates over the equalization tanks are deteriorated to the point that I believe may pose a safety hazard. Please evaluate their integrity and arrange to replace them if determined necessary.

Please provide me a written response to this inspection letter by October 15th 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

Enclosures

ec: Brenda Sweeney

Ohio Environmental Protection Agency

Southwest District Office

# NPDES Compliance Inspection Report
# Semi-Public Sewage Disposal Inspection Form

| Section A: National Data System Coding | | | | | |
|---|---|---|---|---|---|
| Permit Number | NPDES Number | Inspection Date | Inspection Type | Inspector | Facility Type |
| ***1PT00069*CD*** | ***OH0096725*** | ***8-29-12*** | ***C*** | ***S*** | ***2*** |

| Section B: Facility Info | | |
|---|---|---|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| ***Greenon Local School District***<br>***Hustead Elementary School***<br>***3600 Hustead Road***<br>***Springfield, OH 45505*** | ***12:00 PM*** | ***2-1-08*** |
| | Exit Time | Permit Expiration Date |
| | ***12:15 PM*** | ***1-31-13*** |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| ***Brenda and Joe Sweeney*** | ***(937) 605-2748 (cell)*** | |
| Name and Address of Operator of Record | Phone Number(s) | |
| ***Brenda Sweeney***<br>***Unified Laboratories***<br>***12121 Old Columbus Rd.***<br>***South Vienna, OH 45369***<br>***Bsweeney4@woh.rr.com*** | ***(937) 568-4534***<br>***(937) 605-2748 (cell)*** | |
| Name, Address and Title of Responsible Official | Phone Number | |
| ***Ryan Jenkins - Treasurer***<br>***Greenon Local School District***<br>***500 Enon Xenia Rd.***<br>***Enon, OH 45323*** | ***(937) 864-2084*** | |

| Ohio EPA Inspector | Ohio EPA Reviewer |
|---|---|
| 9-25-12 | 9/25/12 |
| Matt Walbridge<br>Division of Surface Water<br>Southwest District Office<br>Date | Martyn Burt<br>Environmental Supervisor<br>Division of Surface Water<br>Southwest District Office<br>Date |

| | |
|---|---|
| Average Daily Design Flow: | **10,000 Gallons/Day** |
| Plant Serves: | **330 students/staff** |
| Average Daily Flow: (Period of Review): | **Approximately 1,940 Gallons/Day (February 2008 – July 2012) Approximately 3,940 gpd during the 2011-2012 school year. Average for June through July 2012 is approximately 3,700 gpd.** |
| Method of flow monitoring: | **Elapsed Run-time of dosing pumps** |
| 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:**

***330 students/staff should generate approximately 5,000 gpd.***

## 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 | ☒ | ☐ | Plant is septic | ☐ | ☒ |
| Blowers are operating | ☒ | ☐ | Blowers are on a timer | ☒ | ☐ |
| Skimmers are operating | ☒ | ☐ | Plant is flooded | ☐ | ☒ |
| Diffusers are operating | ☒ | ☐ | Grating is present | ☒ | ☐ |
| Sludge return is operating | ☒ | ☐ | | | |

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

**Comments/Status:**

***The mixed liquor was very thin and was more grey than brown. The timers for the blowers were adjsuted at the time of the inspectoin so that they matched actual time.***

## Secondary Treatment
## (Settling)

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

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

**Comments/Status:**

***The extended aeration portion of the plant looked OK with all components operating.***

## Tertiary Treatment

| | Yes | No | | Yes | No |
|---|---|---|---|---|---|
| Surface sand Filters: **Slow** | ☒ | ☐ | **Subsurface** | ☐ | ☒ |
| Distribution box operating | ☒ | ☐ | Beds alternated | ☒ | ☐ |
| Are filters ponding/flooding | ☐ | ☒ | Beds raked | ☒ | ☐ |
| Sand filters overgrown | ☐ | ☒ | Chlorination present | ☒ | ☐ |
| UV present | ☐ | ☒ | Dechlorination present | ☒ | ☐ |

Overall maintenance of components is: **Good**

Comments/Status:

***The surface sand filters were raked, but the sand surface was not level. Need to regrade them so waste water does not flow in a channel over to the wall and then short-circuit to the underdrain.***

## Sludge Handling/Storage Disposal

Hauler name: **Unknown**
Disposal Site: **City of Springfied 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: **Good**

**Comments/Status:**

***No comments***

## Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Unnamed tributary of Mud Run**
Discharge is visible: **No** Quality of Effluent: **Clear**

**Comments/Status:**

***No Comments***

## EFFLUENT LIMIT VIOLATIONS

**(Period of Review: February 1, 2008 through July 2012)**

| | Date | Parameter | Limit Type | Limit | Reported Value |
|---|---|---|---|---|---|
| 2008 | August | Total Suspended Solids | Mo. Avg. (mg/l) | 12.0 | 23. |
| | August 1-7 | | Wk. Avg. (mg/l) | 18.0 | 23. |
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| | September 8-14 | | Wk. Avg. (mg/l) | 2000 | 2730. |
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| | November 8-14 | Nitrogen, Ammonia | Wk. Avg. (mg/l) | 4.5 | 18.8 |
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| | | Nitrogen, Ammonia | Mo. Avg. (mg/l) | 3.0 | 16.1 |
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| | February | Total Suspended Solids | Mo. Avg. (mg/l) | 12.0 | 14.5 |
| | | Nitrogen, Ammonia | Mo. Avg. (mg/l) | 3.0 | 35.8 |
| | | | Mo. Avg. (Kg/day) | 0.11 | .17615 |
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| | June | | Mo. Avg. (mg/l) | 1.0 | 2.48 |
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Ohio Environmental Protection Agency

Southwest District Office

# NPDES Compliance Inspection Report
# Semi-Public Sewage Disposal Inspection Form

| Section A: National Data System Coding | | | | | |
|---|---|---|---|---|---|
| Permit Number | NPDES Number | Inspection Date | Inspection Type | Inspector | Facility Type |
| ***1PT00014*BD*** | ***OH0040410*** | ***8-29-12*** | ***C*** | ***S*** | ***2*** |

| Section B: Facility Info | | |
|---|---|---|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| ***Greenon Local School District***<br>***Greenon High School***<br>***3950 South Tecumseh Road***<br>***Springfield, OH 45505*** | ***12:30 PM*** | ***11-1-07*** |
| | Exit Time | Permit Expiration Date |
| | ***1:00 PM*** | ***10-31-12*** |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| ***Brenda and Joe Sweeney*** | ***(937) 605-2748 (cell)*** | |
| Name and Address of Operator of Record | Phone Number(s) | |
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| Ohio EPA Inspector | Ohio EPA Reviewer |
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| | |
|---|---|
| Average Daily Design Flow: | **12,000 Gallons/Day** |
| Plant Serves: | **730 students/staff** |
| Average Daily Flow: (Period of Review): | **Approximately 13,500 gpd**<br>**October 2011 – May 2012**<br>**(school year – minus Christmas Holiday)** |
| Method of flow monitoring: | **Elapsed Run-Time Meter** |
| Type of alarms for plant: | **High water level** |
| Comments: | **Flows are highly variable – sometimes as high as 40,000 gpd and as low as 700 gpd** |

## Pretreatment

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

**Comments/Status:**

**In my previous inspection, I erroneously noted that they used an ultrasonic flow meter.**

## Secondary Treatment (Aeration)

Color of sludge: **Dark Brown**
Quality of Sludge: **Heavy**
Foam: **None present**
Odor: **No objectionable odor present**

| | Yes | No | | Yes | No |
|---|---|---|---|---|---|
| Aeration is taking place | ☒ | ☐ | Plant is septic | ☐ | ☒ |
| Blowers are operating | ☒ | ☐ | Blowers are on a timer | ☒ | ☐ |
| Skimmers are operating | ☒ | ☐ | Plant is flooded | ☐ | ☒ |
| Diffusers are operating | ☒ | ☐ | Grating is present | ☒ | ☐ |
| Sludge return is operating | ☐ | ☒ | | | |

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

**Comments/Status:**

***One of the two sludge returns was not operating as was determined to be clogged***

## Secondary Treatment
## (Settling)

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

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

**Comments/Status:**

***There was no discharge from the clarifier. The water at the surface was somewhat turbid. The sludge return line in the tank across from the blowers was very loose and was not operating – determined to be clogged.***

## Tertiary Treatment

| | Yes | No | | Yes | No |
|---|---|---|---|---|---|
| Surface sand Filters: **Slow** | ☒ | ☐ | **Subsurface** | ☐ | ☒ |
| Distribution box operating | ☒ | ☐ | Beds alternated | ☒ | ☐ |
| Are filters ponding/flooding | ☐ | ☒ | Beds raked | ☒ | ☐ |
| Sand filters overgrown | ☐ | ☒ | Chlorination present | ☒ | ☐ |
| UV present | ☐ | ☒ | Dechlorination present | ☒ | ☐ |

Overall maintenance of components is: **Poor**

Comments/Status:

***Sand needs to be leveled to eliminate short-circuiting. There were some accumulated solids on the sand filters.***

## Sludge Handling/Storage Disposal

| | |
|---|---|
| Hauler name: | **Unknown** |
| Disposal Site: | **City of Springfied 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: **Good**

**Comments/Status:**

***The sludge holding tank was fairly full and I was told that it was to be pumped soon.***

## Plant Discharge

Discharge point is a: **Other**
Name of discharge point: **unnamed trib to Mud Run**
Discharge is visible: **No** Quality of Effluent: **Cloudy**

**Comments/Status:**

***Operators indicated that turbidity in dechlor/post aeration tank was likely caused by accumulated solids in the tank being stirred up by the recently repaired post air diffusor.***

## Other Observations

**Comments/Status:**

***Grating over EQ tank looked very deteriorated.***

## EFFLUENT LIMIT VIOLATIONS

**(Period of Review: February 2008 through August 2012)**

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Summary of Frequency Violations

| Reporting Period | | Parameter | Sample Frequency | Expected | Reported |
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| 2008 | May 15-21 | Residual Chlorine | 1/2Weeks | 1 | 0 |
| | May 22-28 | Water Temperature | 1/Week | 1 | 0 |
| | | Dissolved Oxygen | 1/Week | 1 | 0 |
| 2009 | July 1-7 | Water Temperature | 1/Week | 1 | 0 |
| | | Dissolved Oxygen | 1/Week | 1 | 0 |
| | October 1-7 | Residual Chlorine | 1/2Weeks | 1 | 0 |
| | October 15-21 | Residual Chlorine | 1/2Weeks | 1 | 0 |