Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

October 24, 2012

GEAUGA COUNTY
MUNSON ELEMENTARY
NPDES # 3PT00140*AD

HAMBDEN ELEMENTARY
NPDES #3PT00060*BD

Chardon Local Schools
Attn: Mr. Joseph Bergant II, Superintendent
428 North Street
Chardon,OH 44024

Dear Mr. Bergant:

On October 12, 2012, this writer conducted unannounced inspections of the wastewater treatment plants (WWTP) serving Munson Elementary and Hambden Elementary. Representing the school system was Chris May, Head of Maintenance. Mr. May was present for the inspection of the Munson Elementary WWTP.

The inspection was a follow up to the August 6, 2012 inspection conducted by this office at Hambden Elementary and a routine compliance inspection at Munson Elementary. The purpose of the inspection was to evaluate the operations and maintenance of the WWTPs serving Hambden Elementary and Munson Elementary. This office was also reviewing compliance with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permits for each facility. During the inspection, operation and maintenance records were also evaluated.

According to our records, Paul Header is listed as the Operator of Record (ORC) for both Hambden Elementary School and Munson Elementary School. At the time of the inspection, no operator log book or operation and maintenance records were located at these WWTPs.

Both treatment plants were in unsatisfactory condition at the time of the inspection and are not properly operated and maintained. In addition, no operation and maintenance records or operator log books were located at either facility. A failure to operate and maintain the WWTP is a violation of Parts II and III of your NPDES permit.

The condition of the WWTPs at Hambden Elementary and Munson Elementary is a violation of Part III.3.A of your NPDES permit. As such, Chardon Local Schools is in violation of Ohio Revised Code 6111.07(A). This regulation states:

(A) No person shall violate or fail to perform any duty imposed by sections 6111.01 to 6111.08 of the Revised Code or violate any order, rule or term or condition of a permit issued or adopted by the director of environmental protection pursuant to those sections. Each day of violation is a separate offense.

This office requests the school district evaluate the operations and maintenance of these WWTPs prior to further operation and maintenance violations from accruing.

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The inspection of each WWTP is summarized below:

HAMBDEN ELEMENTARY

According to previous correspondence from this office, dated September 12, 2012 (copy enclosed), the Hambden Elementary School WWTP was operating in poor condition.

- The site contained a strong septic odor, which is representative of a system not functioning properly.
- At the time of the inspection, the WWTP was producing a cloudy effluent.
- Grating was either broken or missing from most components of the WWTP. There were high weeds all around the plant and extension cords and grating scattered throughout the site. This poses an electrical and tripping hazard and must be attended to.
- There were buckets with sludge debris scattered throughout the site. The sludge must be disposed of properly and must not be scattered throughout the site. This is considered a waste material and is considered a violation if left onsite.
- The flow equalization tank was in operation. The aeration tank was in operation and the contents of the tank appeared to be a dark brown. The sludge return pipe appeared to be set out of the tank and was causing sludge to spray out of the tank. The pipe length must be evaluated and updated so the sludge is returned to the aeration tank and not the ground around the tank.
- The clarifier portion of the system contained sludge on the influent baffle, weirs and the surface of the tank. The skimmer was visible in the clarifier and appeared to be set out of the tank level. The high level of the skimmer prohibits the skimming of the surface solids from the clarifier. This must be attended to immediately.
- The pumps in the dosing chamber appeared to be in operation. The sand filter contained weeds, sheets of glass and no lid was provided for the flow splitter box. The sand filter must be maintained and the weeds must be raked off and all debris removed from the filter beds.
- The disinfection chamber was inspected and found to be providing both chlorination and dechlorination. The contents of the disinfection chamber were cloudy and the effluent from the tank appeared turbid.

MUNSON ELEMENTARY

The permit compliance review indicates you have violated the terms and conditions of your NPDES permit. The facility has failed to conduct the required monitoring and has failed to submit any discharge monitoring reports during the compliance review period of January 1, 2010 through October 1, 2012. This is a violation of your NPDES permit and subject to enforcement actions pursuant Ohio Revised Code, Chapter 6111.

The findings of the inspection at this WWTP revealed the system is in poor condition and not treating wastewater effectively. More specifically, this office noted the following deficiencies:

- At the time of the inspection, no record keeping or log books were found onsite.
- The electrical service to the site appears to be inadequate and there are extension cords running all over the site. This must be updated and the extension cords eliminated or properly buried in conduit to prevent tripping and electrical hazards on the site.
- There are buckets of sludge stored onsite. Sludge is considered a waste and must be properly stored onsite or removed from the site. Storing sludge in buckets is not an acceptable storage method and is conducive to spills onsite and unauthorized discharges of spilled sludge to the nearby receiving stream. As such, the sludge

buckets must be removed from the site and all sludge must be stored in a sludge holding tank or properly hauled offsite once removed from the WWTP.

- The aeration chamber was a dark gray color, there was sludge buildup and vegetative growth was noted inside the tank.
- The clarifier contained caked sludge on the weirs, influent baffle and the surface of the tank. There was a hose and pipe located in the clarifier that appeared to be discharging to the ground. This pipe and hose attachment must be removed to prevent any unauthorized discharges to the surrounding area.
- The dosing station was in poor condition and the pumps do not appear to be in operation. There are sump pumps and electrical cords located throughout the site.
- The sand filters were in poor condition. There were buckets scattered throughout both sand filter beds. The flow splitter box was not provided with a cover and there was heavy vegetative growth in both filter beds. The amount of sludge and vegetative growth in both filter beds prevents the sand media from filtering the effluent.
- The disinfection chamber was in poor condition and did not appear to be in operation as a disinfection chamber. There was a hose in the disinfection chamber that was connected to a bucket located in the corner of one sand filter bed. The purpose of this hose assembly is not known, however this office requests this hose assembly be removed.
- The final effluent from the WWTP appeared somewhat turbid. The receiving stream appeared to be in satisfactory condition. It is possible the final effluent may be leaching into the ground prior to being discharged through the final effluent pipe at the receiving stream.
- This office recommends a dye test be conducted (unless already done) to confirm the discharge location from the WWTP.

Mr. Chris May disclosed that the Ohio EPA Compliance Assistance Unit was out to the site October 5, 2012. According to Mr. May, the school system is planning to begin updating treatment components with the intention of completing the updates by spring 2013. Part of the work to be completed will include inspecting the collection system and televising the entire system to search for sources of inflow and infiltration in addition to blockages in the sewer lines. To date, they have located a few storm sewer drains that were tied into the system. These storm sewer drains and any other sources of inflow and infiltration must be removed from the sanitary sewer system. In addition, a sanitary sewer evaluation summary must be forwarded to this office once completed.

Please be aware that a Permit to Install may be required prior to any WWTP updates that will not replace like with like, such as pumps, piping or tankage. Please be sure to check with this office prior to planning any upgrades. Information on the PTI program and requirements can be found at http://epa.ohio.gov/dsw/pti/index.aspx.

OPERATOR CERTIFICATION/RECORD KEEPING

As noted in the September 12, 2012 letter from this office (copy enclosed), According to OAC 3745-7-09 (A), the owner and operator or record of a wastewater treatment system shall maintain operation and maintenance records for the treatment system. There were no operation and maintenance records located onsite during the inspection of both WWTPs. Some formats for the maintenance of these records includes, but is not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.

According to OAC 3745-7-09 (A)(1), the records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within. Furthermore, OAC 3745-7-09(A)(2) indicates records shall be accessible onsite for 24 hour inspection by agency or emergency response personnel.

According to OAC 3745-7-09(A)(3), at minimum, the following information shall be recorded:

a) Identification of the sewerage system or treatment works;
b) Date and time of arrival and departure for the ORC and any other operator required by this chapter;
c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage conveyed, or effluent produced;
d) Results of tests performed and samples taken, unless documented on a laboratory sheet;
e) 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; and
f) Identification of the persons making entries.

In addition to the log book, a copy of the contract with your ORC must be maintained on site.

Part II of the Hambden Elementary School NPDES permit indicates the sewage treatment facility shall be classified as a Class I facility. According to OAC 3745-7-04, the minimum staffing hour requirement for a Class I facility is 3 days per week for a minimum of 1.5 hours per week.

Part II of the Munson Elementary School NPDES permit indicates the sewage treatment facility shall be classified as a Class A facility. According to OAC 3745-7-04, the minimum staffing hour requirement for a Class A facility is 2 days per week for a minimum of 1 hour per week.

Because no log book was located on site for either facility, you are in violation of OAC 3745-7-04 for failure to meet the minimum staffing hour requirements at both of these WWTPs.

SUMMARY

- Hambden Elementary and Munson Elementary are in noncompliance of the terms and conditions of the NPDES permits at each facility for failing to maintain and operate the treatment systems. In addition, monitoring violations have accumulated at Munson Elementary for failure to complete the required monitoring per the requirements of the NPDES permit. The Ohio EPA requests Chardon Local Schools agree to a Compliance Enforcement Plan that will set up a schedule for each facility to return to compliance. This plan will include tasks that must be completed in a given timeframe that will work toward getting the system into compliance. If Chardon Local Schools fails to address the current noncompliance, the Ohio EPA is prepared to refer the facility for an enforcement action.

  A Compliance Enforcement Plan for each facility is being drafted by this office. Once the final plan is compiled, this office will request a meeting with Chardon Local Schools at the Northeast District Office. If the facility does not agree to the Compliance Enforcement Plan, this office is prepared to initiate an enforcement action against Chardon Local Schools.

Please respond within 10 days of receipt of this letter. A failure to respond to this letter may result in this matter being referred for an enforcement action. If you believe this timeline is inadequate, you must contact this office immediately. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,

Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

Enclosure

cc: Bill Fischbein, Ohio EPA, Legal, CO
Andrew Barienbrock, Ohio EPA, DDAGW, Operator Certification Unit, CO
Mr. Dana Stearns, Manager of Operations, Chardon Local Schools
Paul Header, Header Maintenance
Dean Stoll, Ohio EPA, DSW, NEDO
Geauga County Health Department

File: Semi Public/Geauga/Hambden Twp/Hambden Elementary
Semi Public/Geauga/Munson Twp/Munson Elementary