



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

November 27, 2012

Ms. Lori Lytle, Superintendent
Benjamin Logan School District
4740 County Road 26
Bellefontaine, Ohio 43311

**RE: Benjamin Logan School District, Compliance Evaluation Inspection
Notice of Violation**

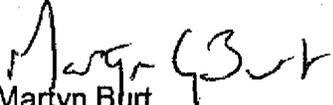
Dear Ms. Lytle:

On November 15, 2012, Joe Reynolds of the Ohio EPA Southwest District Office conducted a Compliance Evaluation Inspection at the Benjamin Logan School wastewater treatment plant at 4740 County Road 26 in Bellefontaine.

The inspection was conducted as part of a compliance review for the school with respect to their National Pollutant Discharge Elimination System (NPDES) permit. The findings from the inspection are included in the enclosed report. The report includes three items that require a response. Please provide a written response by the dates noted.

If you have any questions regarding the report, please contact Mr. Joe Reynolds at (937) 285-6097.

Sincerely,


Martyn Burt
Compliance Supervisor
Division of Surface Water

MB/tf

Enclosure

cc: Dan Defibaugh, Benjamin Logan School District



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PZ00023*ED	OH0108944	11/15/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Benjamin Logan School District 4740 County Road 26 Bellevfontaine, Ohio 43311	9:30AM	7/1/2012
	Exit Time	Permit Expiration Date
	11:10 AM	6/30/2017
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Dan Defibaugh, Bldg. & grounds Supervisor		(937) 593 - 9211 (ext. 1015)
Name, Address and Title of Responsible Official		Phone Number
Benjamin Logan School District 4626 County Road 26 Bellevfontaine, Ohio 43311		(937) 593 - 9211

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
M	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached report.

Inspector	Reviewer
 Joe Reynolds Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
11/27/2012 Date	11/27/2012 Date

Benjamin Logan School Inspection Findings

On November 15, 2012 a Compliance Evaluation Inspection was conducted at the Benjamin Logan School District waste water treatment plant. The system is located at 4740 County Road 26, Bellefontaine. National Pollutant Discharge Elimination System (NPDES) permit number 1PZ00023*ED was issued to the school on June 11, 2012. This permit expires on June 30, 2017.

The schools treatment system consist of a trash trap, two parallel aeration systems, two clarifiers, fixed media filters (on newer plant), effluent holding tank, slow surface sand filters, and a chlorination / dechlorination / post aeration tank. There are four drying beds available for sludge dewatering.

Recent upgrades to the system include: the installation of new blowers and motors on both the old plant (2 new blowers and motors), and newer plant (3 blowers and motors). Along with the blower change out new pressure relief valves were installed.

All of the used sand from the sand filter change out was disposed of at Cherokee Run Landfill during the summer of 2012. This material was previously stock piled next to the plant fence.

Infiltration and inflow (I/I), and weekend sports events have contributed to peak flows. This has resulted in solids carryover to the sand filters. There is a delay between the storm event and increase in treatment flows, suggesting there is an infiltration problem. The down spouts were dye tested previously and are not connected to the sanitary sewer. Mr. Defibaugh is looking at getting a camera to TV the sewer. This will allow him to identify sewer breaks and clogs and will provide a tool to be used as part of the routine maintenance and inspection of the system.

Mr. Defibaugh has made arrangement with a local equipment supply company to provide back-up generator power. The company can provide back-up power to the school within two hours of any outage. A plug in connection for the generators is planned for next summer.

The use of polymer addition to the sludge holding tank has improved sludge drying greatly. The polymer is mixed in a 5 gallon bucket prior to being added to the sludge holding tank. This has added to the storage time in holding tank (4 months). Sludge is then pumped to 4 drying beds prior to disposal at Cherokee Run Landfill. With good weather conditions the sludge can be removed in week.

Benjamin Logan School Inspection Findings (cont.)

In order to provide easier access for operations and maintenance purposes, Mr. Defibaugh plans on moving the aeration distribution piping on the old plant from inside to outside the tank. Mr. Defibaugh hopes to perform this work sometime next year (2013).

Mr. Defibaugh is maintaining an operators log in accordance with Ohio Revised Code 3745 - 7 - 09, "Recordkeeping requirements and responsibilities of a certified operator." In order to complete the log all entries need to be signed or initialed.

From January, 2012 through September, 2012 the school reported the following effluent violations: two CBOD5, and one suspended solids.

Plant Inspection

A trash trap provides preliminary treatment for the plant. Two loads of solids were removed from the tank last month.

Both plants use flow equalizations tanks to shave off daily peak flows (usually lunch time). At the time of the inspection the blower on the newer plant was down for repair. Mr. Defibaugh is going to install a back-up blower until repairs can be made.

New diffusers were added to the aeration tanks. Even mixing was occurring. The mixed liquor in both plants was dark brown. The skimmer on the newer plant was plugged.

There was a minor amount of old solids on the surface of the clarifiers. The effluent from both final clarifiers appeared clear (some minor solids in the effluent trough)

The effluent from the newer plant goes to two up flow filter (one on-line). Mr. Defibaugh is getting ready to switch filters. During normal flows the filters can remain on-line up to a couple months. During football season the filters are alternated every two weeks. From the filter flows enter the holding tank where it combines with flow from the old plant prior to pumping to the sand filters.

Plant Inspection (continued)

One of two tertiary sand filters was on-line. The filter on-line had recently been dosed (was flooded several inches). The filter reportedly will drain in approximately 20 minutes. A moderate amount of solids were noted on the surface.

From the tertiary sand filters flow enters the chlorination / dechlorination / post aeration tank. The chlorination / dechlorination tanks are flow through at this time of year (disinfection season runs May 1 through October 31). Post aeration is run year round. Final effluent samples are collected from the post aeration tank.

The treatment system discharges to an unnamed tributary of Mill Creek. The final effluent was clear. There were no visible solids in the creek.

Items Requiring a Response

1. Please provide written verification as to the date the equalization blower was placed back in service. This information must be provided by no later than December 17, 2012.
2. Please provide written verification as to the date the skimmer on the new plant was unclogged. This information must be provided by no later than December 17, 2012.
3. Please provide preliminary schedules for the purchase of the new sewer camera, and the relocation of the air distribution piping on the older plant. This information must be provided by no later than December 17, 2012.