



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

February 4, 2013

Dr. Richard Gates  
Superintendent  
2625 South Union Road  
Dayton, OH 45418

**RE: Jefferson Township Schools, NPDES Permit 1PT00107\*BD, Montgomery County**

Dear Dr. Gates:

On January 31, 2013, Bob Ostendorf and I met with Mr. Terry Morris to inspect the sewage treatment plant at the Jefferson Township High School. The inspection was in preparation to renew the National Pollutant Discharge Elimination System (NPDES) permit for the elementary school expiring February 28, 2013.

A review of the Discharge Monitoring Reports (DMRs) from the effective date of your current NPDES permit thru January 2013 revealed the following reported violations:

Date	Parameter	Limit Type	Limit	Reported Value
April, 2008	pH	Daily	6.5 S.U.	6.03 S.U.
May, 2009	Chlorine, Total Residual	Bi-Monthly	0.038 mg/l	0.1 mg/l
June, 2011	Total Suspended Solids	Monthly	12.0 mg/l	14.5 mg/l

Explanations were submitted for these violations providing steps taken to determine cause, remedies employed, and plans to avoid violations from recurring, hence, no further explanation of these are necessary.

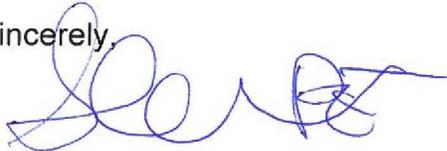
The following record keeping items are noted from this inspection and require further action. The name of the facility and a copy of the Operator of Record certification need to be added to the hard bound record book. A record of daily activities performed during each site visit must be included in a record book. A label providing the name of the facility is to be added to the three ring binder record book. The chain of custody documentation must include indication of preservation techniques for each sample. The chain of custody sample relinquish and analytical laboratory receive times should be

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coincident, since the operator delivers the samples to the laboratory. Please provide me with written notification, via email or regular mail, after completion of labeling the hard bound record book (including a copy of the Operator of Record certification) and the three ring binder. These other items require no response. This response is expected within 30 days from the date of this letter.

Attached you will find the completed NPDES Compliance Inspection Report; please review this document. If you should have any questions and/or comments, please feel free to contact me at (937) 285-6033 or [glen.vonderembse@epa.ohio.gov](mailto:glen.vonderembse@epa.ohio.gov).

Sincerely,



Glen Vonderembse, P.E.  
Environmental Engineer  
Division of Surface Water

GV/kb

Enclosure

cc: Terry Morris, Operator of Record (w/enclosure)

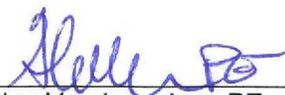


State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report  
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PT00107*BD	OH0132250	1/30/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Jefferson Township High School Jefferson Township Schools 2989 South Union Road Dayton, Ohio Montgomery County	08:30	3/1/2008
	Exit Time	Permit Expiration Date
	09:50	2/28/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Terry Morris, Operator of Record	(Cell) 937.603.1035	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Terry Morris, Operator of Record 2625 South Union Road Dayton, OH 45418	(Cell) 937.603.1035	
Name, Address and Title of Responsible Official	Phone Number	
Dr. Richard Gates, Superintendent 2625 South Union Road Dayton, OH 45418	(Main Office) 937.835.5682	

Ohio EPA Inspector	Ohio EPA Reviewer
 Glen Vonderembse, PE Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
February 12, 2013 Date	2/11/13 Date

Average Daily Design Flow:	<b>20,000 Gallons/Day</b>
Plant Serves:	Jefferson Township High School & Administration Building
Average Daily Flow: (Period of Review):	<b>2,301 Gallons/Day (2008-2013)</b>
Method of flow monitoring:	<b>Public Water Supply Meter at Road</b>
Type of alarms for plant:	<b>None</b>

**Pretreatment**

Type of Pretreatment: **Trash Trap**  
 Does the Trash Trap need pumped: **No**  
 Maintenance of pretreatment components is: **Good**

**Comments/Status:**

Located within fenced area with three child proof lids in-place. Concrete baffles intact.

**Secondary Treatment  
(Aeration)**

Color of sludge: **Light Brown**  
 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input type="checkbox"/>	<input checked="" 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:**

Two pieces of grating require cutting for proper fit.

**Secondary Treatment  
(Settling)**

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

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

**Comments/Status:**

At time of inspection, no flow was observed into weir. Evidence of denitrification present at time of inspection.

**Tertiary Treatment**

	Yes	No		Yes	No
Surface sand Filters: <b>Slow</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Surface</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Fair**

**Comments/Status:**

Beds dosed via dosing siphon with both beds being dosed at the same time. Dosing siphon is not within a separate fenced enclosure, but is protected by heavy, concrete, lid. Some residual vegetation noted on the filter beds. Chlorinator/Dechlorinator present, but out of service due to out of season/winter conditions.

**Sludge Handling/Storage Disposal**

Hauler name: **Roto Rooter**  
 Disposal Site: **Another NPDES permitted facility**  
 Sludge wasted from: **Trash Tank**  
 How often is sludge wasted: **Once per Year**  
 Sludge drying beds: **No**                      Sludge holding tank: **No**

Overall maintenance of components is: **Good**

**Comments/Status:**

Student population has decreased significantly with changing district demographics.

**Record Keeping/ Operator of Record**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... A
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met.....N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)
 

Hard Bound Book for recording time spent at plant, 3 Ring binder for observation sheets, sample collection data, and analytical results. Storage is within bus maintenance garage, locked file cabinet within lockable room.
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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
    - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... N
    - ii. Laboratory results (unless documented on bench sheets)... Y
    - iii. Identification of person making entries..... N
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N/A

**Comments/Status:**

Name of facility and copy of operator's certification required to be added to the hard bound log book. Need to add record of daily activities performed to log book. Three Ring Binder log book requires labeling. Chain of custody requires indication of sample preservation for a given sample. Operator delivers samples to lab; therefore, chain of custody operator relinquish/lab receive times should be coincident.

**Plant Discharge**

Discharge point is a: **Stream**  
 Name of discharge point: **Unnamed Tributary to Bear Creek**  
 Discharge is visible: **No**                      Quality of Effluent: **See Below**

Permit # : 1PT00107\*BD  
NPDES #: OH0132250

**Comments/Status:**

No discharge was noted at the time of inspection. No visible evidence of impacts to the receiving stream.

Permit # : 1PT00107\*BD  
NPDES #: OH0132250

**EFFLUENT LIMIT VIOLATIONS**  
**(Period of Review: February, 2008 thru January, 2013)**

7D = Weekly    30D = Monthly    1D = Daily    Bi-Monthly = 1 / 2 weeks  
Conc. = Concentration (mg/l)    Qty.= Quantity (Kg/Day)

<u>Month Reported</u>	<u>Parameter</u>	<u>Frequency / Units</u>	<u>Limit</u>	<u>Value</u>
April 2008	pH	1D Conc	6.5	6.03
May 2009	Chlorine, Total Residual	Bi-Monthly Conc	0.038	0.1
June 2011	Total Suspended Solids	30D Conc	12.0	14.5