Ohio EPA
40 years and moving forward

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

February 19, 2013

Re: Jefferson County
Edison Local Schools; Stanton 0GS00040*AG;
Pleasant Hill 0GS00043*AG; John Gregg 0GS00041*AG;
Springfield 0GS00039*AG; Edison High 0GS00042*AG
Reconnaissance Inspection
Correspondence (PWW)

Edison Local Schools
14890 State Route 213
Hammondsville, Ohio 43930

Dear Edison Local Schools:

On January 28, 2013, I conducted a reconnaissance inspection where I met with Superintendent Bill Beattie, Transportation Director Joe Debold and Operator Jim Zorbini. We discussed the following five facilities:

Stanton Elementary (0GS00040*AG)
Springfield Middle School (0GS00039*AG)
John Gregg Elementary School (0GS00041*AG)
Pleasant Hill School (0GS00043*AG)
Edison High School (0GS00042*AG)

We have not received any Discharge Monitoring Reports (DMRs) for September 1, 2011 through August 1, 2012 for Stanton Elementary, John Gregg Elementary, Pleasant Hill, or Edison High School. In addition, no DMRs have been submitted to date for Springfield Middle School. During the inspection, I was given a copy of the Notice of Termination for this permit. I understand the NOT for Springfield Middle School had previously been submitted to Ohio EPA in November 2011. I have forwarded the NOT to our Central Office for processing.

Quarterly sampling has not been conducted for the parameters such as TSS, CBOD5, etc. Failure to monitor the effluent in accordance with the permit is a violation. During our discussion, the operator discussed his intentions to monthly sample each school starting February 2013. This increased frequency would be maintained until each respective school was shown to be discharging in compliance with the permit.

Severity monitoring is discussed on page 20 of the general permit and included herein as:

E. For turbidity, odor and color, use the following table to determine the value between 0 and 4 that is reported.

REPORTED VALUE*	SEVERITY DESCRIPTION	TURBIDITY	ODOR	COLOR
0	None	Clear	None	Colorless
1	Mild			
2	Moderate	Light Solids	Musty	Grey(Light Green**)
3	Serious			
4	Extreme	Heavy Solids	Septic	Black (Dark Green**)

* interpolate between the descriptive phrases
** for lagoon systems

Each facility is categorized as a Wastewater Treatment Plant requiring a Class A operator with minimum staffing hours: 2 days per week for a minimum of 1 hour per week.

The following describes the use of codes in the e-DMR system

Monitoring/Reporting Requirements and Reporting Codes for Monitoring/Sampling Stations.

1) If there is no discharge during the month:

a) If using form 4500, report "AL" in the first column of the first day of the month. The AL code is only valid for DMRs submitted on paper using form 4500. Do not report "0" for flow or use any other reporting codes other than "AL".

b) If using e-DMR, DO NOT USE THE "AL" CODE or any other code or report "0" for flow. If no discharge occurred for the full monitoring period, select the "No Discharge" check box at the top of the e-DMR form and enter "No discharge during the month" in the Remarks Section.
Sign or PIN the DMR.

2) If there are no discharges on one or more required monitoring days during the month:

a) Enter the required monitoring data for the days when a discharge occurred;
b) For each required monitoring day there was no discharge, do not enter "0" for flow. Enter code "AC" for each parameter for each monitoring day the facility was not discharging.

3) If no sample is taken on a required monitoring day, use these codes if applicable:

a) Use the "AN" or the "AH" codes. Use the "AN" code to indicate when samples are not collected on days that the facility is not normally staffed. The use of this code is limited to Saturdays, Sundays, and officially recognized municipal holidays if the treatment plant is not normally staffed on those days and staff are needed for sampling. This code is only acceptable for parameters

that are sampled daily, but cannot be used if continuous monitoring and recording is used, e.g. flow metering, continuous pH or temperature monitoring. For parameters sampled at a lesser frequency, the sampling date should be moved to a date when the facility is staffed. Enter code "AN" for each parameter for each monitoring day the facility was not staffed.
b) Use the "AH" code when a required sample is not taken for a reason other than one covered by another "A" code. An explanation as to why the sample was not taken must be entered as a Specific Comment for that parameter and date on eDMR or in the Remarks Section of the form 4500. Enter code "AH" for each parameter for each monitoring day a sample was not taken.

c) Data Substitution Codes (a.k.a. "A Codes") used on the Monthly Discharge Monitoring Report form or eDMR are as follows:

AA - Below Detectable Limit
AB - Analytical Data Lost
AC -Facility Not Discharging (or No Sludge Hauled)
AD - Automatic Analyzer Out of Service
AE - Analytical Data Not Valid
AF - Sample Site Inaccessible Due to Flooding or Freezing
AH - Sample Not Taken, Explanation Included
AJ - Above Range of Automatic Analyzer
AK - Biological Sample Too Numerous to Count
AL - No Discharge For the Month
AN - Sample Not Taken, Plant Not Normally Staffed (Saturdays, Sundays, and Holidays)

More detailed information about the A Codes is available at:
www.epa.state.oh.us/LinkClick.aspx?fileticket=5vr4U3Jt65A%3d&tabid=3425&mid=6479

4) More information about eDMR is at:
www.epa.state.oh.us/dsw/edmr/eDMR.aspx

Disinfection is often achieved using chlorine tablet feeders with similar sized facilities. A subsequent dechlorination tablet feeder will also be used in order to meet the total residual chlorine limit in the permit. These systems are often implemented to meet compliance with bacteria limits contained in the permit. Chlorine disinfection equipment is not currently installed at Pleasant Hill and Stanton Elementary. Dechlorination equipment is not currently installed at Pleasant Hill, Stanton Elementary, and Edison High Schools.

Please respond in writing by April 1, 2013, to acknowledge that the school district has been able to meet the quarterly sampling requirements of the permits. Additionally, provide a status of the chlorination and dechlorination equipment at the four school facilities in use.

A copy of the inspection report is enclosed. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,

Aaron Pennington
District Representative
Division of Surface Water

AMP/dh

Enclosure

c: Jim Zorbini

OhioEPA

State of Ohio Environmental Protection Agency
Southeast District Office

Semi-Public NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES #**	**Date**	**Inspection Type**	**Inspector**	**Facility Type**
0GS00040*AG; 0GS00043*AG; 0GS00041*AG; 0GS00039*AG; 0GS00042*AG	OHS0000003	January 28, 2013	Recon	S	I

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
Edison Local Schools (Stanton Elem., Pleasant Hill Elem., John Gregg Elem, Springfield Middle, & Edison High Schools) 14890 S.R. 213 Hammondsville, Ohio 43930	~1:00 p.m.	September 1, 2011
	Exit Time	**Permit Expiration Date**
	~2:30 p.m.	December 31, 2014
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Jim Zorbini, ORC Joe DeBold, Director of Transportation BillBeattie, Superintendent		
Name(s), Address and Title(s) of Operator of Record	**Phone Number(s)**	
Jim Zorbini		
Name, Address, and Title of Responsible Official	**Phone Number**	
Edison Local School District - Superintendent		

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

Edison Local Schools have just recently begun to submit Discharge Monitoring Reports. To date, each facility has not being taking the required quarterly samples. Additionally, no DMRs have been submitted for Springfield Middle School. However, during the inspection I was given a copy of the NOT submitted in November 2011 for Springfield Middle School. Chlorine disinfection equipment is not currently installed at Pleasant Hill and Stanton Elementary. Dechlorintation equipment is not currently installed at Pleasant Hill, Stanton Elementary, and Edison High Schools.

Inspector	Reviewer
2-19-13	Jennifer M. Witte 2/19/13
Aaron M. Pennington Date Division of Surface Water Southeast District Office	**Jennifer M. Witte** Date Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office