



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

Re: **Notice of Violation**
Hardin County
Hardin Northern School
NPDES Permit

May 7, 2013

Mr. Brian Webb
Hardin Northern Local Schools
11589 State Route 81
Dola, Ohio 45835

Dear Mr. Webb:

On May 1, 2013, Mr. Thomas Poffenbarger and I conducted an inspection at the Hardin Northern School wastewater treatment plant (WWTP). You were present and provided information on operation and maintenance of the wastewater treatment system. At the time of inspection, all of the major treatment units at the WWTP were in service. There was no discharge to the unnamed tributary to Shallow Run during the inspection. The water observed in the chlorine contact tank appeared clear with no noticeable odor. The wastewater treatment plant is still recovering from the propylene glycol spills that occurred last November and January.

A review of the self-monitoring reports that are submitted under the National Pollutant Discharge Elimination System (NPDES) permit shows that this facility is in significant non-compliance (SNC) for TSS and Ammonia at outfall number 001. I am enclosing a list of violations for this facility for the period of October 1, 2012, through May 1, 2013.

A facility becomes SNC when it exceeds the effluent limit for four or more months in two consecutive quarters or exceeds the effluent limit significantly in any two months in two consecutive quarters. Achieving compliance with Ohio's environmental laws is a primary focus of Ohio EPA in order to reduce risks to public health and welfare.

Before we initiate enforcement action, we would like to work with you to achieve satisfactory progress to bring this facility back into compliance. Within 21 days of the date of this letter, please submit, in writing, the actions that you propose to undertake in order to return your facility into compliance with your NPDES permit. You will also need to give us a timetable for these actions that does not extend past May 1, 2014. These actions and timetable may also be submitted by email to me at margaret.christie@epa.ohio.gov.

Mr. Brian Webb
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Our completed inspection report is enclosed. If you wish to meet with us to discuss this matter, or if you have any questions, please contact me at 419-373-3006 within 10 days of receiving this letter in order to set up a meeting.

Sincerely,

A handwritten signature in black ink that reads "Peggy B. Christie". The signature is written in a cursive style with a large, prominent "P" and "C".

Peggy B. Christie
Division of Surface Water

/jlm

Enclosures

pc: Hardin Northern School, Board of Education

ec: Inspection Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY
 OPERATION AND MAINTENANCE INSPECTION
 WWTP'S LESS THAN 150,000 GPD

NPDES Permit No. 2PT00043

Facility Name Hardin Northern Local School Expiration Date Dec. 31, 2013

Facility Location 11589 State Route 81 Date 5/1/13 Time 9:30 am/pm

City Dola County Hardin Township WASHINGTON

Name of Owner Hardin Northern Local Schools Owner Phone 419-759-2237

Person Contacted Mr. Brian Webb Operator of Record Mr. Brian Webb

Flow: Design 10,000 GPD WWTP Classification: A or I

Trib. Pop. _____ (actual - estimated) Weather at time of inspection: Temp 75° Sunny

OEPA Personnel Peggy Christie and Tom Poffenbarger District NWDO

1. Plant Effluent - Mark Severity No. Plant was not discharging at the time of insp.

| No. | Severity Description | Turbidity | Odor | Color |
|-----|----------------------|--------------|--------|-----------|
| 0 | None | Clear | None | Colorless |
| 1 | Mild | | | |
| 2 | Moderate | Light Solids | Musty | Grey |
| 3 | Serious | | | |
| 4 | Extreme | Heavy Solids | Septic | Black |

2. Effect of Effluent on Receiving Stream - Name: Not Observed

| None | Mild | Moderate | Serious |
|------|------|----------|---------|
|------|------|----------|---------|

3. a. Plant has _____ excellent good _____ fair _____ poor _____ operation
 b. Plant has _____ excellent good _____ fair _____ poor _____ maintenance
 c. Sand filters have _____ excellent good _____ fair _____ poor maintenance- N/A

Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) previous spill of propylene glycol

Yes No

| Disinfection: (Required May 1 thru Oct. 31) | |
|---|------------------------------|
| IN | OUT |
| <input checked="" type="checkbox"/> | _____ Chlorination Tablets |
| <input checked="" type="checkbox"/> | _____ Dechlorination Tablets |
| _____ | _____ Ultraviolet (U.V.) |

4. _____ Compliance with NPDES Permit - Time Period: _____ to _____

Facility in SNC for TSS and Ammonia 10/1/12 - 4/1/13

Periodic Violations Y N Parameters: _____
 Chronic Violations _____

5. O & M logbook kept and available on site: Location _____

6. Staffing Requirement Met (Class A - 2 days per week for minimum 1 hour per week)
 (Class I - 3 days per week for minimum 1.5 hours per week)

7. Adequate Plant Safety: Deficiencies _____

Facility Name: _____

| Process | # Units | Unit | If Needed - Description and Comments |
|---------------------|---------|--|--|
| Preliminary | 1 | Trash Trap | Pumping Frequency <i>1/Year</i> |
| | | Grease Trap | Pumping Frequency |
| | | Bar Screen | |
| | | Comminutor | |
| | 2 | Flow Equalization | |
| Aeration Equipment | 3 | Plant Timer <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | Cycle Time: |
| | | Motor / Blower Unit | <i>closely related to the school day</i> |
| Secondary Treatment | 2 | Aeration Tank | Color: <i>Dark Brown</i> <i>Chemical color</i> Adequate Aeration <input checked="" type="checkbox"/> Y <input type="checkbox"/> N |
| Final Settling | 1 | Clarifier | <i>High Sludge Blanket</i> |
| | 2 | Sludge Return | In <input checked="" type="checkbox"/> Out |
| | 1 | Surface Skimmer | In <input checked="" type="checkbox"/> Out |
| | | Fixed Media Clarifier | |
| Tertiary Treatment | 2 | Surface Sand Filter | <i>Some weeds present.</i> |
| | | Polishing Pond | |
| | | Other | |
| Disinfection | 1 | Contact Tank | |
| | 1 | Chlorine Tube Feeder | |
| | 1 | Dechlorination Tube Feeder | |
| | | Ultraviolet (UV) | |
| Flow Metering | | Elapsed Pump Time | |
| | | Recorder (continuous total) | |
| Pumps | 2 | Raw Wastewater (type) | |
| | 2 | Sand Filter Effluent Dosing | |
| Sludge Handling | 1 | Aerated Storage Tank | |
| | | Sludge Drying Bed | |
| Sludge Disposal | | Municipal POTW | |
| | | Landfill | |
| | | Land Application | |
| Advanced Treatment | 1 | Post Aeration | |
| | | Spray Irrigation | |
| | | Other | |

Permit Limit Violations for Hardin Northern School

NPDES Permit # 2PT00043 February 1, 2013 through May 1, 2013

| Reporting Period | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|------------------|----------------|------------------------|------------|-------|----------------|----------------|
| December 2012 | 00530 | Total Suspended Solids | 30D Conc | 12 | 51.8 | 12/1/2012 |
| December 2012 | 00530 | Total Suspended Solids | 7D Conc | 18 | 96. | 12/1/2012 |
| December 2012 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 3.0 | 12.815 | 12/1/2012 |
| December 2012 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 17. | 12/1/2012 |
| December 2012 | 80082 | CBOD 5 day | 30D Conc | 10 | 135. | 12/1/2012 |
| December 2012 | 80082 | CBOD 5 day | 7D Conc | 15 | 270. | 12/1/2012 |
| December 2012 | 80082 | CBOD 5 day | 30D Qty | 0.4 | .61317 | 12/1/2012 |
| December 2012 | 80082 | CBOD 5 day | 7D Qty | 0.6 | 1.22634 | 12/1/2012 |
| December 2012 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 8.63 | 12/15/2012 |
| January 2013 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 3.0 | 9.41 | 1/1/2013 |
| January 2013 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 11.3 | 1/1/2013 |
| January 2013 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 7.52 | 1/22/2013 |
| February 2013 | 00530 | Total Suspended Solids | 30D Conc | 12 | 20.1 | 2/1/2013 |
| February 2013 | 00530 | Total Suspended Solids | 7D Conc | 18 | 31. | 2/1/2013 |
| February 2013 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 3.0 | 24.55 | 2/1/2013 |
| February 2013 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 35.6 | 2/1/2013 |
| February 2013 | 80082 | CBOD 5 day | 7D Conc | 15 | 19. | 2/1/2013 |
| February 2013 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 13.5 | 2/15/2013 |
| March 2013 | 00530 | Total Suspended Solids | 30D Conc | 12 | 18. | 3/1/2013 |
| March 2013 | 00530 | Total Suspended Solids | 7D Conc | 18 | 22. | 3/22/2013 |
| April 2013 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 3.0 | 6.265 | 4/1/2013 |
| April 2013 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 4.5 | 10.2 | 4/1/2013 |

Six Month Significant Non Compliance

| Period Start | Period End | Permit # | Facility Name | Param Code | Parameter Name | Max % Exceed | # of Months Exceeded by > 140% | # of Months Exceeded |
|--------------|------------|----------|-------------------------|------------|-------------------------|--------------|--------------------------------|----------------------|
| 10/1/2012 | 4/1/2013 | 2PT00043 | Hardin-Northern Schools | 00530 | Total Suspended Solids | 433.3 | 3 | 3 |
| 10/1/2012 | 4/1/2013 | 2PT00043 | Hardin-Northern Schools | 00610 | Nitrogen, Ammonia (NH3) | 718.3 | 3 | 3 |



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 2PT00043 | OH0138487 | 05/01/2013 | C | S | 2 |

| Section B: Facility Data | | |
|--|-----------------------|------------------------|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| Hardin Northern Local Schools 11589 State Route 81 Dola, OR 45835 | 9:30 AM | 01/01/2009 |
| | Exit Time | Permit Expiration Date |
| | 10:00 AM | 12/31/2013 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Mr. Brian Webb | 419-759-2331 ext 1218 | |
| Name, Address and Title of Responsible Official | Phone Number | |
| Hardin Northern Local Schools 11589 State Route 81 Dola, OH, 45835 | 419-759-2331 | |

| 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 | S | Other |
| N | Collection System | | | | |

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

The wastewater treatment plant is still recovering from the propylene glycol spills that occurred during the winter. The facility is in SNC for TSS and Ammonia. A chemical odor was detected at the aeration tanks. The sand filters had some weeds present.

| Inspector | Reviewer |
|--|--|
|  Peggy B. Christie Division of Surface Water Northwest District Office |  Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office |
| 5/3/13 Date | 5/3/13 Date |