

OHIO E.P.A.

OCT -5 2004

ITERED DIRECTOR'S JOURNA:

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of:

Shelby County Board of Commissioners
129 East Court Street, Suite 100
Sidney, Ohio 45365

Director's Final Findings
and Orders

PREAMBLE

Pursuant to Ohio Revised Code (ORC) Sections 6111.03, 6117.34 and 3745.01, the Director of the Ohio Environmental Protection Agency (Ohio EPA) hereby makes the following Findings and issues the following Orders:

PARTIES BOUND

These Orders shall apply to and be binding upon the Shelby County Board of Commissioners, hereinafter "Respondent," its assigns and successors in interest. No change in ownership of Respondent's Wastewater Treatment Plants (WWTP) will in any way alter Respondent's responsibilities under these Orders. Respondent's obligations under these Orders may be altered only by the written approval of the Director of Ohio EPA.

FINDINGS OF FACT

Findings Related to Arrowhead Hills Subdivision, Fair Haven County Home, Millcreek Subdivision, Hickory Dell Subdivision, and Lake Loramie Special Sanitary Sewer District (SSSD)

1. Shelby County Board of Commissioners owns and operates wastewater treatment plants (WWTPs) at Arrowhead Hills Subdivision, Fair Haven County Home, Millcreek Subdivision, Hickory Dell Subdivision, and Lake Loramie Special Sanitary Sewer District (SSSD).
2. The Arrowhead WWTP consists of a trash trap, flow equalization, extended aeration, clarification, slow surface sand filters, chlorination, dechlorination, and post-aeration. The WWTP is designed to treat 70,000 gpd of sewage and has an

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

[Signature] Date 10-5-04

effective National Pollutant Discharge Elimination System (NPDES) permit for the discharge that was issued June 13, 2000.

3. The final effluent from the Arrowhead WWTP discharges "pollution", as that term is defined in ORC Section 6111.01, directly to Mill Creek. Mill Creek flows into Loramie Creek which then flows into the Great Miami River. Mill Creek, Loramie Creek, and the Great Miami River are defined as "waters of the state" in accordance with ORC Section 6111.01.
4. The Fair Haven WWTP consists of a trash trap, bar rack, biolac/extended aeration, clarification, and chlorination. The WWTP is designed to treat 13,000 gpd of sewage and had an effective NPDES permit for the discharge that was issued January 15, 1999, and expired January 28, 2004. Respondent timely submitted a permit renewal application.
5. The final effluent from the Fair Haven WWTP discharges "pollution", as that term is defined in ORC Section 6111.01, directly to Mill Branch, a tributary of the Great Miami River. Mill Branch and the Great Miami River are defined as "waters of the state" in accordance with ORC Section 6111.01.
6. The Millcreek subdivision contains two wastewater treatment plants. Both WWTPs consist of trash traps, extended aeration, clarification, surface sand filters, chlorination, and dechlorination. The WWTPs are designed to treat 20,000 gpd of sewage at outfall 001 and 17,500 gpd of sewage at outfall 002 and had an effective NPDES permit for these discharges that was issued on December 14, 1995 and expired on December 28, 2001. Respondent timely submitted a permit renewal application.
7. The final effluents from the Millcreek WWTPs discharge "pollution", as that term is defined in ORC Section 6111.01, directly to Mill Creek. Mill Creek flows into Loramie Creek which then flows into the Great Miami River. Mill Creek, Loramie Creek, and the Great Miami River are defined as "waters of the state" in accordance with ORC Section 6111.01.
8. The Hickory Dell WWTP consists of a trash trap, flow equalization, extended aeration, clarification, rapid sand filter, and ultraviolet disinfection and has an effective NPDES permit for the discharge that was issued on September 1, 2000. The WWTP was upgraded via PTI (No. 05-11753) issued November 29, 2001, that increased its design capacity from 16,000 gpd to 20,000. Respondent's existing NPDES permit (No. 1PG00101*AD) is written with loading based on 16,000 gpd which was the design of the previous WWTP.
9. The final effluent from the Hickory Dell WWTP discharges "pollution", as that term

is defined in ORC Section 6111.01 to an unnamed tributary of Brush Creek which then flows into Brush Creek and then into the Great Miami River. The unnamed tributary, Brush Creek, and the Great Miami River are defined as "waters of the state" in accordance with ORC Section 6111.01.

10. The Lake Loramie WWTP consists of a primary treatment cell, two polishing cells, chlorination and dechlorination facilities. The plant is designed to treat 400,000 gpd of sewage and had an effective NPDES permit for the discharge that was issued October 10, 1996 and expired on October 28, 2001. Respondent timely submitted a permit renewal application.
11. The final effluent from the Lake Loramie WWTP discharges "pollution", as that term is defined in ORC Section 6111.01, directly to Loramie Creek which then flows into the Great Miami River. Loramie Creek and the Great Miami River are defined as "waters of the state" in accordance with ORC Section 6111.01.
12. Numerous NPDES permit violations for total suspended solids, ammonia, fecal coliform, dissolved oxygen, chlorine, and carbonaceous biochemical oxygen demand (CBOD₅) have been documented at the WWTPs. These violations are listed in Attachment I. Each violation cited in Attachment I constitutes a separate violation of ORC Sections 6111.04 and 6111.07. Attachment I is hereby incorporated into these Findings & Orders as if fully stated herein.
13. On March 22, 2000, Arrowhead, Fair Haven, Millcreek and Hickory Dell WWTPs were inspected. These inspections noted that Arrowhead's sand filters were clogged and leaking and that there were solids in Mill Creek. Fair Haven's WWTP was septic and had discharged black solids to Mill Branch. The sand filters at Millcreek were clogged. Hickory Dell's WWTP was in a state of disrepair and exhibited severe signs of corrosion. The sand filters at Hickory Dell had been bypassed since December, 1999. Overall, the operation of these plants was poor or not being conducted properly.
14. On October 3, 2000, a follow-up inspection was conducted at Arrowhead, Fair Haven, Millcreek, and Hickory Dell WWTPs. In general, similar conditions were noted at the plants. Sand filters were not being maintained at any of the plants and the sand filters were overflowing at Arrowhead and Hickory Dell. Fair Haven was again discharging a black plume of partially treated effluent to Mill Branch. At Hickory Dell WWTP, Brush Creek was black for approximately 80 feet downstream of the outfall and Arrowhead had four (4) inches of solids with bloodworms in Mill Creek. Millcreek WWTP's outfalls were observed to have solids and white scum immediately beneath the outfall in Mill Creek.
15. During the week of March 26-30, 2001, DSW's Compliance Assistance Unit (CAU)

along with staff from US EPA Region V evaluated these plants for purposes of determining the factors contributing to Respondent's noncompliance. The major limiting factors included staffing levels, process control concepts, and design limitations. The CAU staff provided Respondent with monitoring tools and training on the use of the tools and effectively making process control decisions. A follow up training took place on May 30 and 31, 2001. Additionally, CAU staff conducted a process control workshop at the Fair Haven facility on October 9 and 10, 2001 for Shelby County staff and other nearby operators.

16. As set forth in Attachment I, violations have continued to occur subsequent to these training efforts.
17. Sanitary sewers for Arrowhead and Millcreek have historically had excessive Inflow and Infiltration (I/I) which has caused compliance problems with their respective NPDES permits. Respondent has taken steps to investigate and eliminate/reduce I/I in these systems including:
 - a. Adopting legally enforceable rules that prohibit roof drains, foundation drains and other clean water connections to the sanitary sewer;
 - b. Implementing recommendations of previous sewer system evaluations necessary to eliminate/reduce excessive I/I and to also not exceed permit effluent limitations; and
 - c. Conducting additional studies at the Arrowhead WWTP to better identify sources of I/I.
18. Respondent has submitted and Ohio EPA has approved an Operations and Maintenance (O & M) manual for the Arrowhead, Hickory Dell, Millcreek, Fair Haven and Lake Loramie WWTPs. The O&M manual includes:
 - a. A preventive maintenance schedule that includes daily, weekly, monthly and annual maintenance procedures on each of the WWTPs;
 - b. A schedule and standard operating procedure for performing the necessary operational and control tests (e.g., biochemical oxygen demand (5-day), total suspended solids, pH, mixed liquor suspended solids, centrifuge, settleometer, settleability, dissolved oxygen, temperature, NPDES permit monitoring requirements, F/M ratio, etc.), at each wastewater treatment facility; and
 - c. A provision for a monthly operation and maintenance record.
19. Respondent obtained an independent evaluation of the staffing requirements for

properly operating and maintaining the WWTPs and has submitted a report to the Ohio EPA, SWDO for review and comment. The report includes detail regarding the number of hours required for proper operation, including the necessary operational and control tests (e.g., biochemical oxygen demand (5-day), total suspended solids, pH, mixed liquor suspended solids, centrifuge, settleometer, settleability, dissolved oxygen, temperature, NPDES permit monitoring requirements, F/M ratio, and etc.), proper maintenance (i.e., routine preventive maintenance), laboratory time, travel time to and from the WWTPs, and yard maintenance.

Findings Related to Unsanitary Conditions within the unincorporated area of McCartyville

20. The McCartyville community is an unincorporated area in Van Buren Township, Shelby County, Ohio. The McCartyville community consists of approximately 86 residences located on State Routes 119 and 29, Bornhorst Road, Renee Drive, Pleiman Road and McCartyville Road.

Centralized wastewater treatment facilities are currently unavailable in the McCartyville community.

22. Many of the homes located in the McCartyville community are served by failing on-site sewage disposal systems and home aerators that discharge raw or partially treated sewage to storm sewers that discharge to tributaries of Loramie Creek and ultimately discharge to the Great Miami River. These tributaries, Loramie Creek and the Great Miami River are defined as "waters of the state" pursuant to ORC Section 6111.01.

Ohio EPA received a letter from the Board of Health for the Shelby County Health District ("Board of Health") dated April 12, 2002, in which the Board made a formal complaint regarding the unsanitary conditions in the McCartyville Subdivision. A copy of this letter is attached hereto as "Attachment III". Attachment III is hereby incorporated into these Findings & Orders as if fully stated herein.

Pursuant to ORC Section 6117.34, whenever the board of health of a general health district makes complaint, in writing, to the Ohio Environmental Protection Agency that unsanitary conditions exist in any county, the Director forthwith shall inquire into and investigate the conditions complained of.

25. Pursuant to ORC Section 6117.34, if, upon investigation of the complaint, the Director finds that it is necessary for the public health and welfare that sanitary or drainage facilities be acquired or constructed, maintained, and operated to serve any territory outside municipal corporations in any county, the Director shall notify the board of county commissioners of the county of that finding and order that corrective

action be taken. The board shall obey the order.

26. During numerous site visits to this area during October of 2002, Ohio EPA observed evidence of unsanitary conditions including whitish/greyish/blackish water, algae, sewage fungus, sludge deposits and odors.

Ohio EPA conducted sampling in the McCartyville Subdivision on October 8th, October 15th, and October 22th of 2002. These sampling events were conducted in accordance with OAC Rule 3745-1-04. Sampling results, which are attached hereto as "Attachment IV", confirmed the existence of unsanitary conditions and violations of Ohio's general water quality criteria set forth in OAC Rule 3745-1-04 due to elevated levels of fecal coliform and E. Coli bacteria. Attachment IV, is hereby incorporated into these Findings & Orders as if fully stated herein.

Small lot sizes, in conjunction with local soil conditions make the installation of replacement or repair of existing on-site sewage disposal systems an unacceptable solution to remedy the unsanitary conditions.

29. Based on the observed conditions and sampling results in the McCartyville community, it is necessary for the public health and welfare that sewer improvements or sewerage treatment or disposal works be constructed, maintained, and operated to service the McCartyville community.
30. The discharge of pollutants into waters of the state in excess of the permissible limits of the National Pollutant Discharge Elimination Permit is a violation of ORC Section 6111.04.
31. Compliance with the ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.
32. These Orders do not alter or modify Respondent's NPDES permits. Ohio EPA recognizes that until the dates specified in Order No. 2, Respondent will likely discharge pollutants in excess of those authorized in its NPDES permit. The purpose of the interim effluent limitations set forth in Attachment II of these Orders is to assess compliance with these Orders and not to authorize discharges of pollutants in excess of the permissive discharges specified under Respondent's NPDES permits.
33. These Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the Permit-to-Install (PTI) requirement of OAC Chapter 3745-42.

34. With respect to Orders issued pursuant to ORC Chapter 6111, the Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of Chapter 6111 of the Revised Code.

ORDERS

- 1 Respondent shall achieve compliance with the NPDES permit final effluent limitations for Hickory Dell, Arrowhead and Millcreek immediately upon the effective date of these Orders.
2. The Respondent shall achieve compliance with the final effluent limitations of the Fair Haven permit as expediently as practicable, but not later than the dates developed in accordance with the following schedule:
 - a Within nine (9) months of the effective date of these Orders, Respondent shall develop and submit to the Ohio EPA's SWDO for approval four (4) copies of a PTI application and detail plans for WWTP improvements to attain compliance with the final effluent limitations established in Part I, A of Fair Haven's NPDES permit.
 - b. Within fifteen (15) months of the effective date of these Orders, Respondent shall commence construction of the approved WWTP upgrades specified in the approved PTI to attain compliance with the final effluent limitations established in Part I, A of Fair Haven's NPDES permit.
 - c. Within twenty-two (22) months of the effective date of these Orders, Respondent shall complete construction of the approved WWTP upgrades specified in the approved PTI to attain compliance with the final effluent limitations established in Part I, A. of Fair Haven's NPDES permit.
 - d. Within twenty-four (24) months of the effective date of these Orders, Respondent shall attain operational level of the WWTP and meet final effluent limitations that are specified in Part I, A. 1 of Fair Haven's NPDES permit.
 - e. Until the date the improved wastewater treatment works are to attain compliance with final effluent limitations as specified in Order 2d, Respondent shall properly operate and maintain its existing wastewater treatment works to achieve the best quality effluent possible. Compliance with the effluent limitations and monitoring

requirements contained in Attachment II of these Findings & Orders shall constitute compliance with this Order.

3. Respondent shall take steps to eliminate excessive inflow/infiltration (I/I) to prevent violations of permit effluent limitations for Arrowhead's NPDES permit in accordance with the following schedule:
 - a. Within eighteen (18) months of the effective date of these Orders, Respondent shall implement all the recommendations of the sewer system evaluations identified in Finding 17.c that are necessary to eliminate excessive I/I and to also not exceed permit effluent limitations. If a project is necessary to reduce I/I to comply with permit conditions, Respondent shall submit a progress report to Ohio EPA, SWDO every six (6) months summarizing the progress made in removing I/I from the collection system.
 - b. Within twenty-four (24) months of the effective date of these Orders, Respondent shall complete all work necessary to eliminate excessive I/I and to also not exceed permit effluent limitations. A report summarizing the results of the effort to reduce I/I to comply with final effluent limitations established in Part I.A of Arrowhead's NPDES permit shall be submitted to the Ohio EPA, SWDO within twenty-seven (27) months of the effective date of these Orders.
4. Respondent shall perform the measures described below to eliminate the unsanitary conditions in the McCartyville community as expeditiously as practicable, but not later than the dates contained in the following schedule:
 - a. As soon as possible but not later than ten (10) months from the effective date of these Findings and Orders, Respondent shall submit to Ohio EPA, Southwest District Office, a complete Permit-to-Install (PTI) application with approvable detailed plans for a wastewater collection system sufficient to abate unsanitary conditions in the McCartyville Subdivision.
 - b. As soon as possible but not later than eighteen (18) months from the effective date of these Findings and Orders, Respondent shall initiate construction of the wastewater collection system.
 - c. As soon as possible but no later than thirty-six (36) months from the effective date of these Findings and Orders, Respondent shall complete construction of the wastewater collection system in order to eliminate the unsanitary conditions. Construction shall be deemed completed when the wastewater collection system is capable of conveying sewage to the Lake Loramie wastewater treatment plant.
 - d. No later than thirty-seven (37) months from the effective date of these Orders,

the Respondent shall order, pursuant to Ohio Revised Code Chapter 6117, all property owners in the McCartyville community to connect to the wastewater collection system and to cease all other discharges of sewage and other waste. Respondent shall, as necessary, take timely action to enforce its orders.

5. Within fourteen (14) days of the milestone dates in Orders 4.b, 4.c, and 4.d, Respondent shall submit written notification and documentation demonstrating compliance with said orders. Respondent shall submit all documents required under these Orders to Ohio EPA's Southwest District Office at the following address:

Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402
(ATTN: Enforcement Group Leader)

6. Respondent shall pay to Ohio EPA the amount of \$197,821.00 in settlement of the Ohio EPA's claim for civil penalties, which may be assessed pursuant to Chapter 6111 of the Ohio Revised Code. Respondent shall satisfy this penalty in the following manner:

- a. Within thirty (30) days of the effective date of these Findings and Orders, Respondent shall pay \$25,000 to Ohio EPA. This payment shall be made by tendering a check payable to the "**Treasurer, State of Ohio**" to the following address:

Office of Fiscal Administration
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

A photocopy of the check shall be sent to Ohio EPA's Southwest District Office at:

Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402

- b. Respondent shall satisfy \$172,821.00 of the civil penalty through implementation of a Supplemental Environmental Project consisting of installing flow equalization at the Lake Loramie WWTP to assist the Village of Fort Loramie in the elimination of Sanitary Sewer Overflows (SSOs).The

SEP shall be implemented in accordance with the following schedule:

As soon as possible but not later than seven (7) months from the effective date of these Findings and Orders, Respondent shall submit to Ohio EPA, Southwest District Office, a complete Permit to Install (PTI) application with approvable detailed plans for flow equalization at the Lake Loramie WWTP sufficient to accommodate projected increased flows from the Village of Fort Loramie, and ultraviolet disinfection at the Lake Loramie WWTP.

- ii. As soon as possible but not later than thirteen (13) months from the effective date of these Findings and Orders, Respondent shall initiate construction of the flow equalization basins.
- iii. As soon as possible but not later than nineteen (19) months from the effective date of these Findings and Orders, Respondent shall complete construction of the flow equalization facilities and ultraviolet disinfection at the Lake Loramie WWTP.

- c. Should Respondent fail to implement the SEP identified in Order 6b within the deadline set forth in Order 6.b.iii, Respondent shall pay penalties to Ohio EPA by tendering a check payable to the "**Treasurer, State of Ohio**" to the address set forth in Order 6.a in the appropriate amount as set forth below:

Respondent shall be liable for and shall pay a penalty of \$100 per day for the first sixty (60) days of failure to meet the deadline set forth in Order 6.b.iii., and thereafter, a penalty of \$250 per day of failure to meet the deadline.

- ii. The penalties stipulated in Order 6.c.i. for failure to meet the deadline set forth in Order 6.b.iii shall not exceed \$172,821.00 and shall be Ohio EPA's only remedy for any failure of Respondent to implement the SEP by the deadline set forth in Order 6.b.iii..

- 7. In accordance with the provisions set forth in the Unavoidable Delays paragraph, the Respondent may request an extension to the time for purposes of implementing the SEP project if compliance with the deadline set forth in Order No. 6.b.iii is prevented or delayed by an event which constitutes an "unavoidable delay" as defined by that paragraph.
- 8. For PTI applications submitted in conjunction with Orders 2, 4 or 6b, Ohio EPA shall act within thirty (30) days to either approve the application, or if the PTI application

is not approvable upon initial submission, provide Respondent with written comments and requested revisions. Respondent shall respond in writing to Ohio EPA within thirty (30) days of receipt of Ohio EPA's comment letter. If Ohio EPA's comments are not addressed such that a PTI cannot be issued, Ohio EPA may submit a second comment letter to Respondent in accordance with the procedure set forth above or issue a proposed denial of the PTI application.

UNAVOIDABLE DELAYS

The Respondent shall cause all work to be performed in accordance with applicable schedules and time frames unless any such performance is prevented or delayed by an event which constitutes an unavoidable delay. For purposes of these Orders, an "unavoidable delay" shall mean an event beyond the control of the Respondent which prevents or delays performance of any obligation required by these Orders and which could not be overcome by due diligence on the part of the Respondent. Increased cost of compliance shall not be considered an event beyond the control of the Respondent.

The Respondent shall notify Ohio EPA in writing within ten (10) days after the occurrence of an event which the Respondent contends is an unavoidable delay. Such written notification shall describe the anticipated length of the delay, the cause or causes of the delay, the measures taken and to be taken by the Respondent to minimize the delay, and the timetable under which these measures will be implemented. The Respondent shall have the burden of demonstrating that the event constitutes an unavoidable delay.

If Ohio EPA does not agree that the delay has been caused by an unavoidable delay, Ohio EPA will notify the Respondent in writing. If Ohio EPA agrees that the delay is attributable to an unavoidable delay, Ohio EPA will notify the Respondent in writing of the length of the extension for the performance of the obligations affected by the unavoidable delay.

OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. Nothing in these Orders shall be construed as waiving or compromising in any way the applicability and enforcement of any other statutes or regulations applicable to Respondent's operation of its Facilities.

RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except

as specifically waived in Waiver section of these Orders.

TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is defined in OAC Rule 3745-33-03(D)(1) for a corporation, OAC Rule 3745-33-03(D)(2) for a partnership, OAC Rule 3745-33-03(D)(3) for a sole proprietorship, and OAC Rule 3745-33-03(D)(4) for a municipal, state, or other public facility.

WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

EFFECTIVE DATE

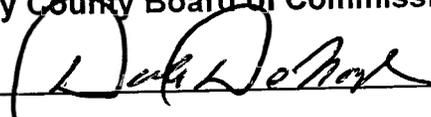
The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO AGREED:

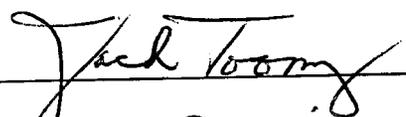
Shelby County Board of Commissioners

By:  Date: 9-7-04

Name & Title: COMMISSIONER

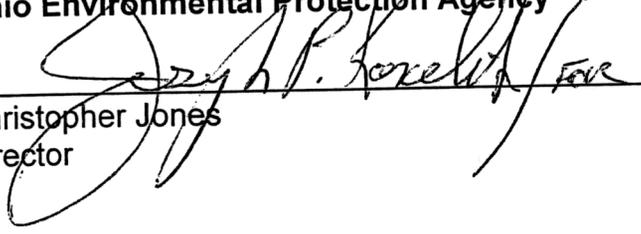
By:  Date: 9-7-04

Name & Title: commissioner

By:  Date: 9-7-04

Name & Title: Commissioner

IT IS SO ORDERED AND AGREED:
Ohio Environmental Protection Agency

 Date: 10/4/04
Christopher Jones
Director