



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Laura H. Powell, Acting Director

January 16, 2007

**Re:** Guernsey County  
Coventry Estates #1 WWTP  
Reconnaissance Inspection  
Correspondence (PWW)

Guernsey County Board of Commissioners  
627 Wheeling Avenue  
Suite 300  
Cambridge, Ohio 43725-2251

Dear Board of Commissioners:

On December 26, 2006, I conducted a reconnaissance inspection at the Coventry Estates #1 wastewater treatment plant. The purpose of the inspection was to determine compliance with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number OPG00010\*GD and to evaluate the wastewater treatment plant's performance. Mr. Dennis Dougherty the new operator was present during the inspection and provided information regarding operation and maintenance of the plant.

As a result of my inspection, I have the following comments:

1. At the time of my inspection one filter bed was in use and ponded with a couple feet of water and less than one foot from overtopping. I observed a large square hole in the north side of the center bed tank wall which allowed wastewater to spill onto the ground and flow over the hill. To minimize the flow of wastewater to the ground the operator switched flow to another filter bed. I instructed the operator that the hole and a similar hole found in the northern filter bed should be immediately plugged with cement. The overflow of the sand filter is considered a bypass which is prohibited and if continued may lead to formal enforcement.
2. The southern most filter bed had a noticeable crack in the corner next to the dividing wall which would cause leakage upon minimal ponding. This crack should be immediately sealed prior to use.
3. In the August 21, 2006 CEI letter you were instructed to provide additional filter sand in all three beds which has yet to be done. The three beds should immediately be replenished with additional pre-approved filter sand to a depth of 18 inches and kept to a height to maintain 18 inches of freeboard. Please forward the sand testing data to our office for approval prior to purchase.

4. Please provide information as to the origin of flows that drain from the smaller pipe opening entering the chlorine contact tank. At the time of my inspection there was flow from the white PVC pipe as well as the pipe entering the tank wall although only one filter bed was in use.
5. According to Part I C of your NPDES permit, you were required to submit an Infiltration and Inflow (I&I) Control Plan to our office by October 1, 2005. To date, the county has yet to complete an I&I plan or provide any annual reports of work completed to reduce I&I flows. The continued failure to complete an I&I Control Plan and lack of effort to reduce I&I flows entering the plant may lead to future enforcement action. The I&I Control Plan should include a minimum of smoke testing the entire collection system and a manhole survey to be completed by August 2007 and a schedule to eliminate all I&I sources and make necessary manhole repairs by December 2007. Please submit an I&I control plan by April 2007 or enforcement actions will be taken.
6. The proposed connection of this treatment plant to the City of Cambridge which has been discussed for years now is not a valid reason to neglect the I&I issues within this subdivision. The connection to the city will not be permitted prior to the development of an I&I Control Plan and the reduction of flows. Please provide an updated schedule as to when connection to the city may occur and documentation to support your ongoing efforts to connect.

At the time of my inspection, the effluent was relatively clear and free of any objectionable odors. Based upon my inspection the treatment plant was found to be in marginal compliance with the terms and conditions of your NPDES permit. Attached is a copy of my detailed inspection report for your review.

Please submit a written response to the items discussed above within 30 days upon receipt. The cooperation received during the inspection was appreciated. If you have any questions, please contact me at (740) 380-5416.

Sincerely,



Jake Greuey  
District Representative  
Division of Surface Water

JJG/dh

Enclosures

- c: Mr. Clarence Ridgley, Supt., Guernsey County Water & Sewer Dept.
- c: Dennis Dougherty, Operator
- c: Paul Sherry, Sanitary Engineer, City of Cambridge

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPG00010*GD	OH0050393	December 26, 2006	R	S	1

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Coventry Estates I U.S. Route 22 Cambridge Township, Ohio	10:00 a.m.	April 1, 2005
	Exit Time	Permit Expiration Date
	10:20 a.m.	March 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Dennis Dougherty, Plant Operator	
Name, Address and Title of Responsible Official	Phone Number
Guernsey County Commissioners 627 Wheeling Avenue Cambridge, Ohio 43725-2251	(740) 432-9200

**C. AREAS EVALUATED DURING INSPECTION**

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>-</u> Pretreatment
<u>S</u> Records/Reports	<u>-</u> Laboratory	<u>U</u> Compliance Schedules
<u>M</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>   </u> Other
<u>U</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

**D. SUMMARY OF FINDINGS/COMMENTS** (attach additional sheets if necessary)

See attached letter.

  
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 Jake Geuey, Inspector, Ohio EPA, Southeast District Office

1/8/06  
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 Date

  
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 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

1-16-07  
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 Date