



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PG0009020090406

DARKE

ROLIN ACRES SUBDIV WWTP

MILLER, JOSEPH

2009/04/06



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 7, 2009

Darke County Commissioners
County Courthouse
100 Public Square
Greenville, OH 45331

**RE: Darke County Commissioners Package Plant Inspections/ Notices of Violation
Rolin Acres Subdivision 1PG00090*CD/OH0085561
Stillwater Golf Estates 1PX00014*CD/OH0119067
Darke County Criminal Justice Center 1PG00104*BD/OH0133621
Darke County Home 1PG00105*BD/OH0133612**

Ladies and Gentlemen,

On March 25, 2009, I conducted inspections at the above wastewater treatment package plants maintained and operated by the Darke County Commissioners. These inspections were conducted to determine compliance with the respective NPDES discharge permits.

I have also completed a review of the self reporting monitoring reports for these facilities. Violations of the effluent limitations were noted during this review. A detailed inspection report is attached.

Provide a response to the "Items Requiring a Response" section of the report by **April 24, 2009**. Your response should include dates, either actual or proposed, for completion of actions. If you have any questions, I can be reached at (937) 285-6109.

Sincerely,

Joe Miller

Division of Surface Water

Enclosures

CC: Steve Crawford, Operator
Jeff Marshall, Darke County Commissioners
Darke County Health Department





Permit #: 1PX00014*CD
 NPDES #: OH0119067

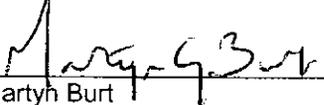


State of Ohio Environmental Protection Agency
 Southwest District Office

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
1PX00014*CD	OH0119067	3/25/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Stillwater Golf Estates WWTP Lot 24, Stillwater Drive Versailles, OH 45380	10:25 PM	January 1, 2008
	Exit Time	Permit Expiration Date
	10:35 PM	December 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
N/A		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Steve Crawford	937-548-2415	
Name, Address and Title of Responsible Official	Phone Number	
Darke County Commissioners County Administration Building 520 South Broadway Greenville, OH 45331	937-547-7370	

Ohio EPA Inspector	Ohio EPA Reviewer
 Date: 4-2-07	 Date: 4/6/09
Joe Miller Division of Surface Water Southwest District Office	Martyh Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Average Daily Design Flow:	7,500 Gallons/Day
Plant Serves:	Golf Course Community
Average Daily Flow: (Period of Review):	8,000 GPD (January 2007 to February 2009)
Method of flow monitoring:	Dosing
Type of alarms for plant:	Visual

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Unknown**

Comments/Status:

Secondary Treatment (Aeration)

Color of sludge: **Unknown**
 Quality of Sludge: **Unknown**
 Foam: **Unknown**
 Odor: **None**

	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 type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is... **Unknown**

Comments/Status:

Only one blower installed.

Tertiary Treatment

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

Overall maintenance of components is: **Satisfactory**

Comments/Status:

Permit # : 1PX00014*CD
NPDES #: OH0119067

Sludge Handling/Storage Disposal

Hauler name: Unknown
Disposal Site: Unknown
Sludge wasted from: Sludge Holding

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Unknown**

Comments/Status:

Plant Discharge

Discharge point is: **unnamed tributary**
Name of discharge point: **unnamed tributary of the Stillwater River**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Permit # : 1PG00105*BD
 NPDES # : OH0133612

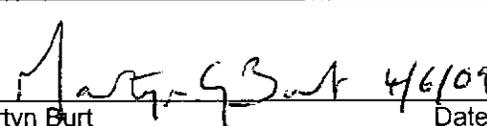


State of Ohio Environmental Protection Agency
 Southwest District Office

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
1PG00105*BD	OH0133612	3/25/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Darke County Home 5105 County Road Home Greenville, OH 45331	11:25 PM	March 1, 2008
	Exit Time	Permit Expiration Date
	11:35 PM	February 28, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
N/A		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Steve Crawford	937-548-2415	
Name, Address and Title of Responsible Official	Phone Number	
Darke County Commissioners County Administration Building 520 South Broadway Greenville, OH 45331	937-547-7370	

Ohio EPA Inspector	Ohio EPA Reviewer
 Joe Miller Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4-2-09 Date	4/6/09 Date

Permit # : 1PG00105*BD
 NPDES # : OH0133612

Average Daily Design Flow:	10,000 Gallons/Day
Plant Serves:	Retirement Home
Average Daily Flow: (Period of Review):	7,700 GPD (January 2007 to February 2009)
Method of flow monitoring:	Dosing
Type of alarms for plant:	Visual

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Unknown**

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Light Brown**
 Quality of Sludge: **Unknown**
 Foam: **None**
 Odor: **None**

	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 checked="" type="checkbox"/>	<input 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... **Satisfactory**

Comments/Status:

Tertiary Treatment

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

Overall maintenance of components is: **Satisfactory**

Comments/Status:

Not disinfection season.

Permit # : 1PG00105*BD
NPDES #: OH0133612

Sludge Handling/Storage Disposal

Hauler name: Mike's Sanitation
Disposal Site: Mike's Sanitation disposal facility
Sludge wasted from: Sludge Holding

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Satisfactory**

Comments/Status:

Sludge holding tank installed in 2007.

Plant Discharge

Discharge point is: **field tile**
Name of discharge point: **unnamed tributary of Bridge Creek**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Permit #: 1PG00104*BD
 NPDES #: OH0133621

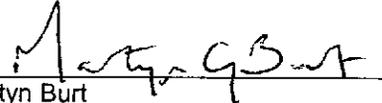


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 Southwest District Office

NPDES Compliance Inspection Report
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Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PG00104*BD	OH0133621	3/25/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Darke County Criminal Justice Center 5185 County Road Home Greenville, OH 45331	11:35 PM	May 1, 2008
	Exit Time	Permit Expiration Date
	11:45 PM	April 30, 2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
N/A		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Steve Crawford	937-548-2415	
Name, Address and Title of Responsible Official	Phone Number	
Darke County Commissioners County Administration Building 520 South Broadway Greenville, OH 45331	937-547-7370	

Ohio EPA Inspector	Ohio EPA Reviewer
 Joe Miller Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
4-2-09 Date	4/6/09 Date

Average Daily Design Flow:	10,000 Gallons/Day
Plant Serves:	Offices and jail
Average Daily Flow: (Period of Review)	2,400 GPD (January 2007 to February 2009)
Method of flow monitoring:	Dosing
Type of alarms for plant:	Visual

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Unknown**

Comments/Status:

Secondary Treatment (Aeration)

Color of sludge: **Unknown**
 Quality of Sludge: **Unknown**
 Foam: **Unknown**
 Odor: **None**

	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 checked="" type="checkbox"/>	<input 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... **Satisfactory**

Comments/Status:

Tertiary Treatment

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

Overall maintenance of components is: **Marginal**

Comments/Status:

Not disinfection season. Sludge near filters needs disposed of in dumpster/trash can.

Permit # : 1PG00104*BD
NPDES #: OH0133621

Sludge Handling/Storage Disposal

Hauler name: Mike's Sanitation
Disposal Site: Mike's Sanitation disposal facility
Sludge wasted from: Sludge Holding

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Satisfactory**

Comments/Status:

Plant Discharge

Discharge point is: **field tile**
Name of discharge point: **unnamed tributary of Bridge Creek**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Permit # : 1PG00090*CD
 NPDES #: OH0085561

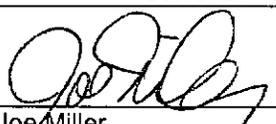
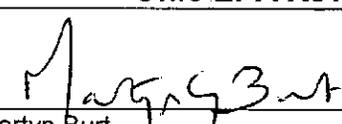


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 Southwest District Office

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
1PG00090*CD	OH0085561	3/25/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Rolin Acres Subdivision WWTP Warvel Road Greenville, OH 45331	10:05 PM	June 1, 2007
	Exit Time	Permit Expiration Date
	10:15 PM	May 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
N/A		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Steve Crawford	937-548-2415	
Name, Address and Title of Responsible Official	Phone Number	
Darke County Commissioners County Administration Building 520 South Broadway Greenville, OH 45331	937-547-7370	

Ohio EPA Inspector	Ohio EPA Reviewer
 Date: 4-2-09	 Date: 4/6/09
Joe Miller Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Average Daily Design Flow:	24,000 Gallons/Day
Plant Serves:	Residential Subdivision (~200 residents)
Average Daily Flow: (Period of Review):	22,400 GPD (January 2007 to February 2009)
Method of flow monitoring:	Dosing
Type of alarms for plant:	Visual

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Unknown**
 Maintenance of pretreatment components is: **Unknown**

Comments/Status:

**Secondary Treatment
(Aeration)**

Color of sludge: **Unknown**
 Quality of Sludge: **Unknown**
 Foam: **Unknown**
 Odor: **None**

	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 checked="" type="checkbox"/>	<input 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... **Satisfactory**

Comments/Status:

Tertiary Treatment

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

Overall maintenance of components is: **Satisfactory**

Comments/Status:
 Not disinfection season

Permit # : 1PG00090*CD
NPDES # : OH0085561

Sludge Handling/Storage Disposal

Hauler name: Mike's Sanitation
Disposal Site: Mike's Sanitation disposal facility
Sludge wasted from: Sludge Holding

Sludge drying beds: **No** Sludge holding tank: **Yes**

Overall maintenance of components is: **Satisfactory**

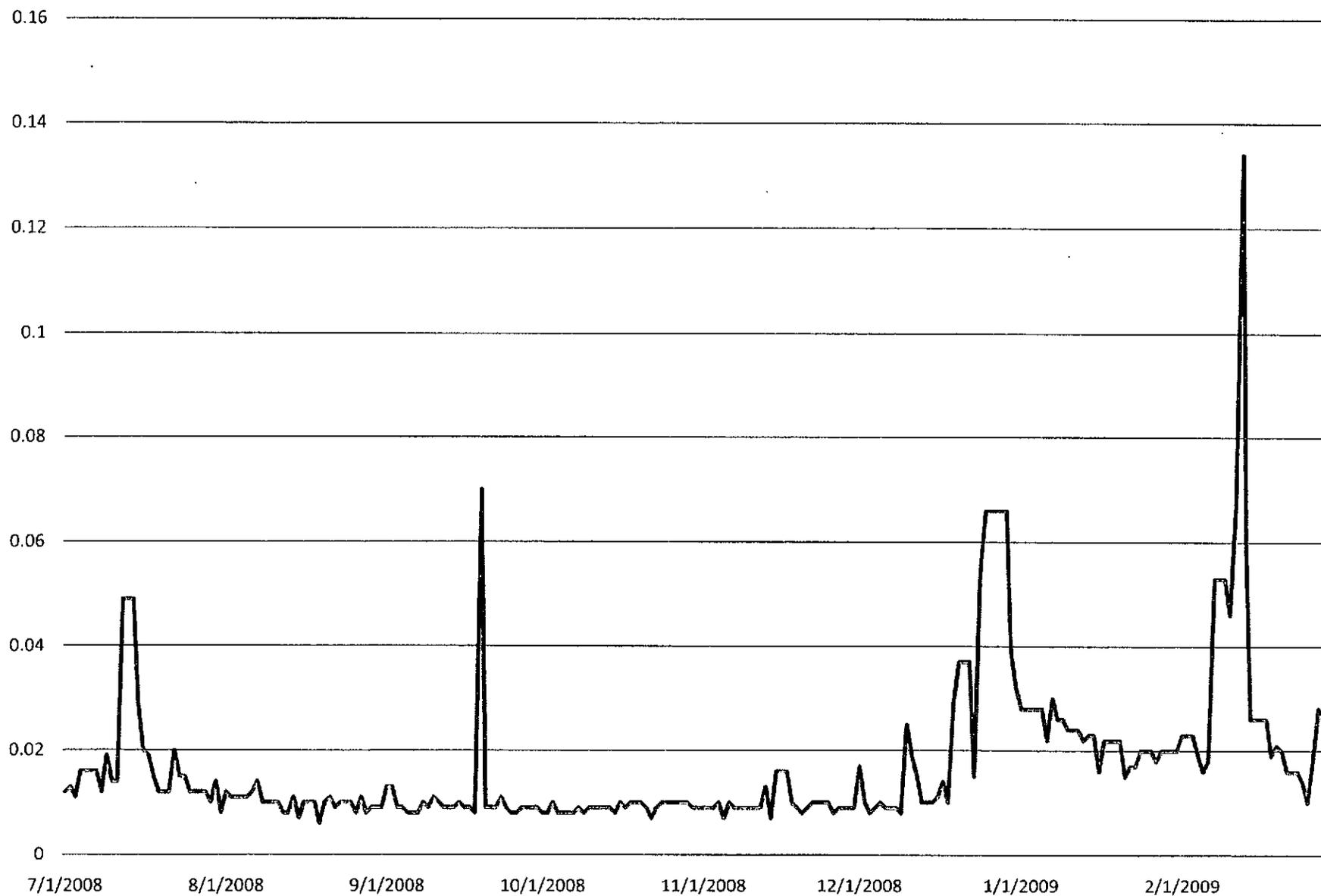
Comments/Status:

Plant Discharge

Discharge point is: **stream**
Name of discharge point: **unnamed tributary of Boyd Creek**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

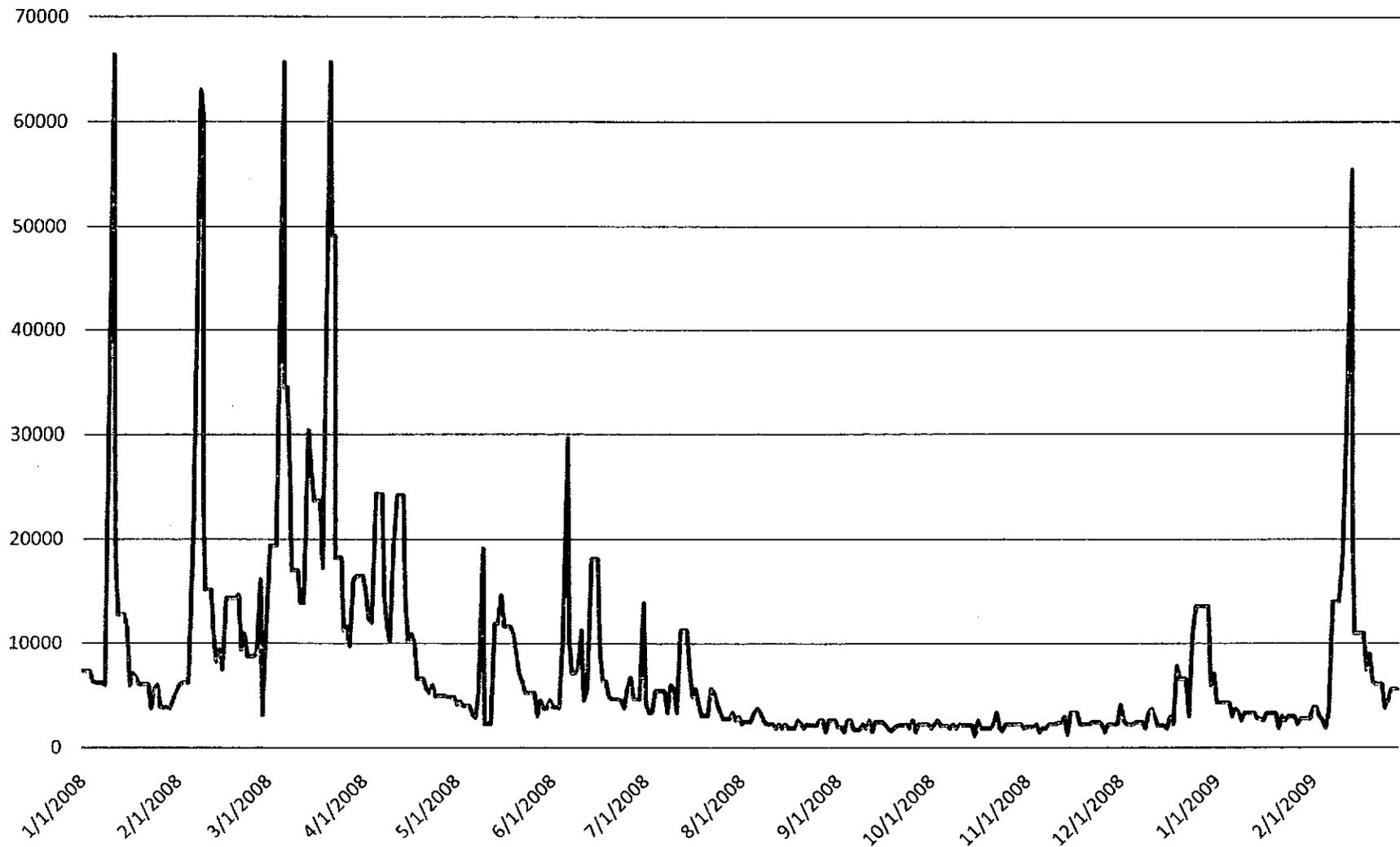
Comments/Status:

Rolin Acres WWTP Flow (MGD) July 2008 to February 2009



Stillwater Golf Estates WWTP Flow (GPD) January 2008 to February 2009

(Design Flow 7500 GPD)



Darke County Commissioners Package Plants NPDES effluent violations

Rolin Acres WWTP (July 2008 to February 2009)

Permit No	Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
1PG00090*CD	January 2009	00530	Total Suspended Solids	30D Conc	12.0	196.5	1/1/2009
1PG00090*CD	January 2009	00530	Total Suspended Solids	30D Qty	1.1	14.8977	1/1/2009
1PG00090*CD	January 2009	00530	Total Suspended Solids	1D Conc	18.0	387.	1/26/2009
1PG00090*CD	January 2009	00530	Total Suspended Solids	1D Qty	1.6	29.2959	1/26/2009

Darke County Criminal Justice Center WWTP (March 2007 to February 2009)

Permit No	Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
1PG00104*AD	May 2007	80082	CBOD 5 day	30D Conc	10	11.	5/1/2007
1PG00104*BD	October 2008	00530	Total Suspended Solids	30D Conc	12	18.	10/1/2008
1PG00104*BD	February 2009	00400	pH	1D Conc	9.0	9.3	2/10/2009
1PG00104*BD	February 2009	00400	pH	1D Conc	9.0	9.1	2/25/2009

Darke County Criminal Justice WWTP Frequency Violations (March 2007 to Feb 2009)

Permit No	Reporting Period	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
1PG00104*AD	May 2007	00400	pH	1/2Weeks	1	0	05/15/2007
1PG00104*AD	May 2007	00010	Water Temperature	1/Week	1	0	05/22/2007
1PG00104*AD	May 2007	00300	Dissolved Oxygen	1/Week	1	0	05/22/2007
1PG00104*AD	June 2007	50060	Chlorine, Total Residu	1/2Weeks	1	0	06/15/2007

Darke County Home WWTP (March 2007 to February 2009) Effluent Limit Violation

Permit No	Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
1PG00105*AD	June 2007	00300	Dissolved Oxygen	1D Conc	6.0	1.04	6/25/2007

Darke County Home WWTP Frequency Violations (March 2007 to February 2009)

Permit No.	Reporting Period	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
1PG00105*AD	May 2007	00400	pH	1/2Weeks	1	0	05/15/2007
1PG00105*AD	May 2007	00010	Water Temperature	1/Week	1	0	05/22/2007
1PG00105*AD	May 2007	00300	Dissolved Oxygen	1/Week	1	0	05/22/2007
1PG00105*AD	June 2007	50060	Chlorine, Total Residual	1/2Weeks	1	0	06/15/2007
1PG00105*AD	July 2007	50060	Chlorine, Total Residual	1/2Weeks	1	0	07/01/2007
1PG00105*BD	February 2009	00400	pH	1/2Weeks	1	0	02/01/2009
1PG00105*BD	November 2008	00083	Color, Severity	1/Day	1	0	11/07/2008
1PG00105*BD	November 2008	01330	Odor, Severity	1/Day	1	0	11/07/2008
1PG00105*BD	November 2008	01350	Turbidity, Severity	1/Day	1	0	11/07/2008

Darke County Commissioner WWTP Inspections
March 25, 2009

Overview

The Darke County Commissioners operate four wastewater treatment plants in Darke County. The fifth treatment plant, Darke County Garage and MRDD was eliminated and tied into the City of Greenville's sanitary sewer system in 2008. Two of the four treatment systems serve residential subdivisions in Darke County that do not have municipal sewers available. These subdivisions, Rolin Acres and Stillwater Golf Estates, receive excess infiltration and inflow during wet weather events which creates compliance issues. The Darke County Criminal Justice Center and Darke County Home are both located on County Home Road off of State Route 49 just south of the City of Greenville.

The average design flow and average daily flow of these facilities over the past two years are as follows:

<i>Facility</i>	<i>Average Design Flow</i>	<i>Average Daily Flow(2/07-2/09)</i>
Rolin Acres	24,000 GPD	22,400 GPD
Stillwater Golf Estates	7,500 GPD	8,000 GPD
Darke Criminal Justice	10,000 GPD	2,400 GPD
Darke County Home	10,000 GPD	7,700 GPD

In the attached graphs from the two subdivision WWTPs, the high flows during wet weather events can be readily observed. These peaks have historically caused the WWTPs to exceed effluent limitations. Additional work towards addressing infiltration and inflow at these plants was expected to be completed by the end of 2008. The construction of equalization basins at these facilities should be evaluated concurrently with continuing infiltration and inflow reduction projects.

ITEMS REQUIRING A RESPONSE

1. **Infiltration and Inflow** – Submit a plan for I/I reduction using equalization and other means to address excessive wet weather flows at Rolin Acres Subdivision WWTP and Stillwater Golf Estates WWTP.
2. **Effluent Violations** – Provide a description of the cause of each violation listed for each facility and the measures being taken to prevent future occurrences.
3. **Non-Compliance Notification** – As described in previous inspections, violations of your NPDES permit are required to be reported as described in Part III., Item 12 of your NPDES permits. This requirement is not being met. This requirement is the permit holder's responsibility but is typically delegated to the Operator of Record. Provide the established protocol for fulfilling this reporting requirement and the name of the staff person responsible. In lieu of the 800 number listed in the permit, you may contact me directly.

