



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049



1PZ0005420110411

HIGHLAND WOODLAND LAKE INC *

JACKSON, JOSHUA 2011/04/11

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



Environmental
Protection Agency

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

April 11, 2011

KM Retreat LLC – Woodland Lake Resort
Attn: Mr. Kevin Manley
1090 Aledo Drive
Beavercreek, OH 45430

**RE: Woodland Lake Resort WWTW/Compliance Evaluation Inspection Report
NPDES Permit No. OH02112658/OEPA PERMIT NO. 1PZ00054*BD**

Dear Mr. Manley,

On April 4, 2011, I conducted an NPDES Compliance Evaluation Inspection at the KM Retreat LLC-Woodland Lake wastewater treatment works (WWTW). Kyle Arn, with the Highland County Health Department, was present during the inspection. Mr. Mark Edenfield (contractor) was contacted during the inspection (via telephone). The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES Permit and verify that the newly constructed on-site sewage disposal system was operating so that the NPDES permit for the WWTW could be revoked.

As the inspection report describes, the WWTW is still discharging since the on-site sewage disposal system cannot function properly due to large amounts of infiltration and inflow in the sewage collection system. Please see the attached report for details.

A copy of the report on the inspection is enclosed. Please pay special attention to the compliance schedule shown within the report. A follow-up inspection will be conducted on May 19, 2011.

If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

cc: Kyle Arn, Highland County Health Dept.

Enclosures



State of Ohio Environmental Protection Agency
Southwest District Office

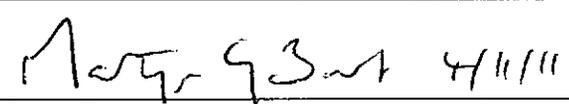
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PZ00054*BD	OH02112658	4/4/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
KM Retreat LLC - Woodland Lake Resort WWTW 881 West Deadfall Road Highland County, Washington Township	10:00 a.m.	12/1/2005
	Exit Time	Permit Expiration Date
	10:30 a.m.	11/30/2010
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Jack Hickey, Resident		
Name, Address and Title of Responsible Official		Phone Number
Kevin Manley, Owner KM Retreat LLC 1090 Aledo Drive Beavercreek, OH 45430		937-371-1444

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
U	Permit	U	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	U	Compliance Schedule
U	Operations & Maintenance	U	Effluent/Receiving Waters	U	Self-Monitoring Program
U	Facility Site Review	N	Sludge Storage/Disposal	N	Other
U	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Report.	

Inspector	Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 4-11-11	Date 4/11/11

Inspection Findings

In order to meet the requirements of the Director's Final Findings & Orders issued to KM Retreat LLC, on October 28, 2008, Mr. Kevin Manley (owner) contracted with a professional engineer to design an on-site sewage disposal system to serve approximately 60 RV lots at Woodland Lake Resort. Once constructed and operational, there would no longer be a need for the wastewater treatment works (WWTW) serving the facility nor the NPDES permit which is required by Ohio law for all discharges to "Waters of the State".

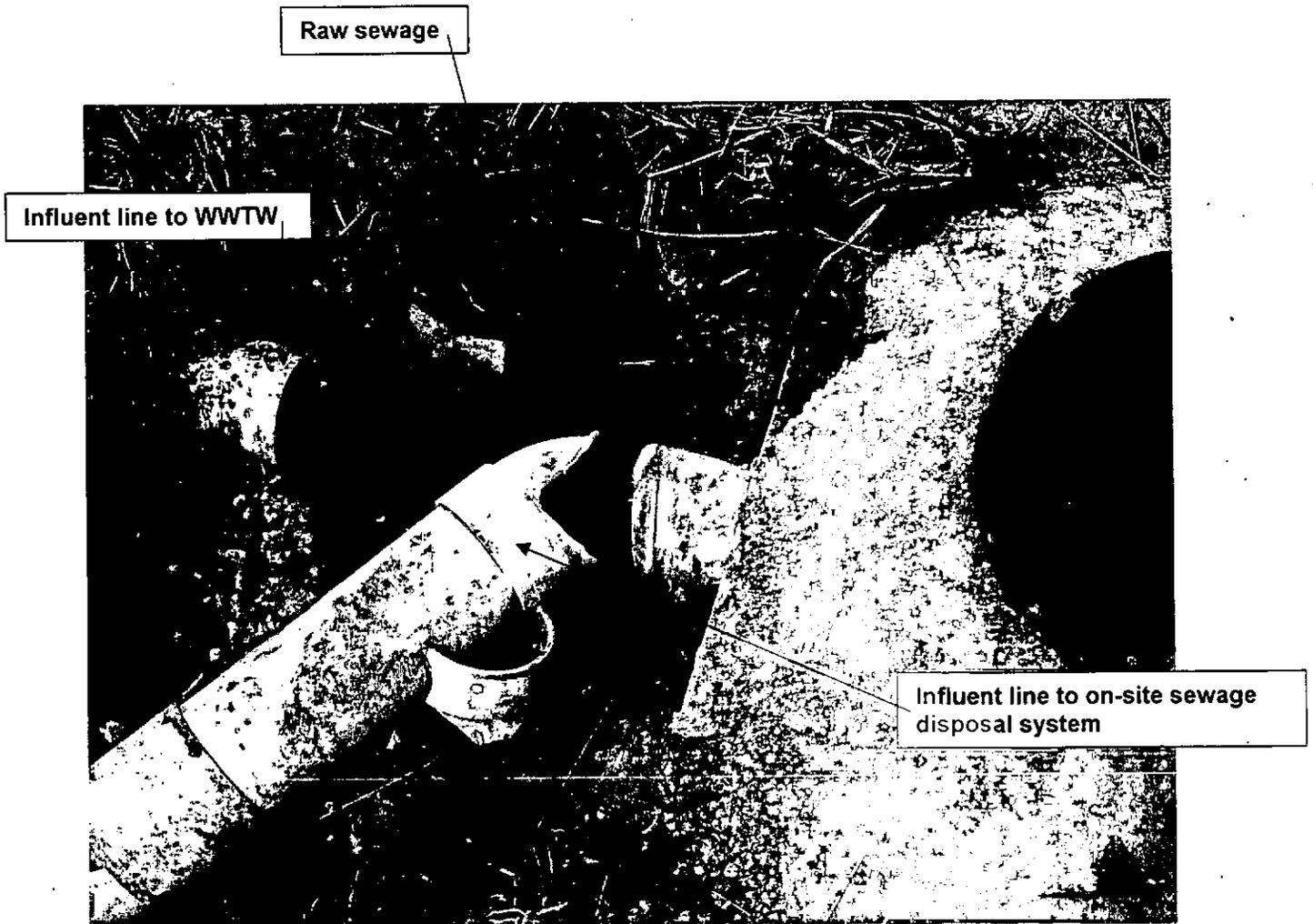
At the end of August of 2010, Mr. Kevin Manley did not renew the contract for the Operator of Record (Brandon Leeth) despite the fact that there was still a discharge from the WWTW. At this same, discharge monitoring reports were no longer submitted to Ohio EPA. **Failure to maintain an Operator of Record and submit discharge monitoring reports to Ohio EPA are a violation of the facility's NPDES permit and of the Director's Final Findings & Orders issued to KM Retreat LLC.**

The Highland County Health Department approved the design for an on-site sewage disposal system (dual-mound) in November of 2010 and this design was based on existing water use records only (with a margin of safety). Construction was started in the winter and was completed in late March of 2011.

The purpose of this inspection was to ensure that the on-site sewage disposal system was operational and that there was no longer a discharge from the WWTW. When Kyle Arn (Highland County Health Department) and I arrived at the site, we spoke briefly to Jack Hickey (Resident) before continuing on to the area of the newly constructed mound system. Mr. Arn had informed me beforehand that the contractor for the mound system (Mark Edenfield) had recently spoke with him concerning large quantities of extraneous water received at the influent to the on-site sewage disposal system during and after rain events. The contractor re-lined a section of sewer line in the collection system for Woodland Lake Resort.

At the time of the inspection, it was noted that the influent PVC line to the on-site sewage disposal system was split open and raw sewage was ponding in that same area. The blowers were not operating on the WWTW and there was a strong odor of raw sewage. The effluent from the WWTW was gray in color and there was solids deposition at the discharge.

Mr. Arn contacted Mr. Edenfield during the inspection via telephone. Mr. Edenfield stated that on April 1, 2011, he broke the sewer line in order to prevent damage to the integrity of the on-site sewage disposal system because influent flows were so high (He was called out during a rain event and sewage was coming out of the dosing and septic tank lids).



He is working on a proposal to submit to the owner for either performing significant fixes to collection system main lines or replacing the entire collection system with new lines. **Mr. Edenfield stated that he could have the work done and the new on-site sewage disposal system on-line by no later than May 19 2011. On that date, a follow-up inspection will be performed. Until such time, the WWTW should be operated and maintained according the terms and conditions of the NPDES permit.**

Permit # : 1PZ00054*BD
NPDES # : OH02112658

Swimming Pool and Pool house

Currently, the swimming pool backwash water and restroom/kitchen wastewater from the pool house are directed (via gravity sewer) to an old, inoperative pump station next to the stream. In the past, this pump station would convey flow to the WWTW. As it is now, any influent flow would bypass to the stream.

I mentioned to Mr. Edenfield in a telephone conversation on April 8, 2011, that the swimming pool backwash water should be directed to the field across the road from the pool area. It should be released at a rate so not to cause run-off into a stream, but rather infiltration into the soils. On the other hand, the sewage generated from the pool house should either be directed to the new on-site sewage disposal system or a new system should be installed to serve this building. Consult with the local health department for any approvals.