



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

September 30, 2010

Re: Tuscarawas County
Ravens Trailer Sales WWTP
Compliance Evaluation Inspection
Correspondence (PWW)

Mr. Curtis Goehring
Ravens Trailer Sales, Inc.
6332 Columbia Road, NW
P.O. Box 525
Dover, Ohio 44622-0525

Dear Mr. Goehring:

On September 22, 2010, I conducted a compliance evaluation inspection at the Ravens Trailer Sales 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 OPR00140*BD and to evaluate wastewater treatment plant performance. The facility was found to be in non-compliance.

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

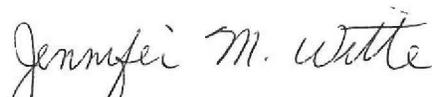
- There is a large hole in the side of the riser on the trash trap. The contents in this tank were septic and gassing. This tank needs to be pumped out and the tank either needs to be repaired or replaced immediately.
- Some of the grating on the aeration tanks is rotting, developing holes and becoming unsafe. These grates need to be replaced to ensure operator safety.
- The mixed liquor in the aeration tanks was light brown in color. Aeration and roll were good.
- There was a significant amount of sludge and scum on the water surface at the influent baffle in the clarifier. The contents of this tank were brown in color. In addition, there was a moderate amount of sludge and scum on the water surface in the main portion of the clarifier. There was pin floc rising to the surface. Lastly, there was a significant amount of algae growth on the weirs.
- The sides of the clarifier should be gently scraped all around the hopper with a slow, easy downward motion, just enough to help move the sludge towards the bottom of the hopper. This procedure should be done at least once per week.

- Excess sludge and scum should be removed from behind the inlet and effluent baffles. The weirs should be kept clean and the water surface next to the weir should be clear.
- At the time of my inspection, there was sludge and scum lying in the bottom of the outlet channel of the clarifier.
- There is a dosing tank to pump the effluent to the sand filters for additional treatment. At the time of my inspection, the dosing pumps were not in operation.
- At the time of my inspection, there were a few weeds and some sludge present on the surface of the sand filters. The existing filter media in the sand filters is too large. The sand in the filter beds should be replaced with the appropriate material. Clean washed sand with an effective size of between 0.4 and 1.0 mm and a uniformity coefficient less than 3.0 must be used. It is important that clean sand is used. The sand should contain very little silt or clay. It is recommended that the sand be tested according to ASTM C-117 to confirm that the sand does not contain material more than 2% by weight and is finer than a 200 sieve. Enclosed is a list of suppliers of sand that may meet these specifications. There may be other suppliers of the sand that can meet these specifications.
- At the time of the inspection, the sand was not level in the filter beds. The material should be level throughout the filter.
- Sludge that is removed from the sand filters should be disposed in a sanitary landfill.
- At the time of my inspection, the chlorination and dechlorination tubes could not be inspected because I could not remove the caps. Disinfection is required May 1 through October 31 each calendar year.
- The concrete in the chlorination/dechlorination tank appears to be pitting. Please have the integrity of the tank inspected.
- At the time of my inspection, the final effluent in the chlorination/dechlorination tank was visually clear. There was no discharge to the receiving stream at the time of my inspection.
- Please be aware Part III, Item 3(A) of the permit states, "At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."
- Part II, Item L of your permit requires an annual sludge report be submitted each year by January 31. Please be advised that an annual report was to be submitted for 2006, 2007, 2008 and 2009. To date we have not received these reports. We will expect them without further delay. I have enclosed the appropriate form for your use.

- The NPDES permit for the facility expires on March 31, 2011. A renewal application is due no later than October 2, 2010. Please be aware Ohio Administrative Code 3745-33-03(B) states "If a permit renewal application is submitted at least one hundred eighty days prior to the expiration date of the existing permit, and the director does not issue a new permit before the expiration date, the conditions of the expired permit shall continue in force until the director acts on the permit application."
- Please be aware your new permit will require you to meet E. coli limits (126 #/100 ml for 30-day average and 284 #/100ml for 7-day average) rather than fecal coliform limits. The permit renewal will include one monitoring season for E.coli, however, you will be required to continue meeting fecal coliform limits during that season.
- At the time of my inspection, I looked at the operator records for the plant. A review of the document reveals that there is no specific information provided on the operations of the plant. In addition, the document does not provide the start and stop times for the operator. I have enclosed a copy of the Ohio Administrative Code 3745-7-09 regarding recordkeeping requirements. Please review and have your operator make the necessary changes to the records.

Ravens Trailer Sales must continue to make immediate efforts to return the facility to compliance. Unsatisfactory ratings were given due to the issues mentioned in this letter. A copy of our completed inspection report is enclosed. Please submit a written response to the aforementioned comments within thirty (30) days of receipt of this letter. The assistance and cooperation received during the inspection are appreciated. If you have any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte
Chemical Engineer – Environmental Specialist II
Division of Surface Water

JMW/dh

Enclosure

c: Ron Lambert, Operator, Village of Strasburg

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PR00140*BD	OH0127728	Sept. 22, 2010	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Ravens Trailer Sales, Inc. 6332 Columbia Road, NW Dover, Ohio 44622	12:22 p.m.	April 1, 2006
	Exit Time	Permit Expiration Date
	12:52 p.m.	March 31, 2011

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
None	
Name, Address, & Title of Responsible Official	Phone Number
Mr. Curtis Goehring Ravens Trailer Sales, Inc. 6332 Columbia Road, NW P.O. Box 525 Dover, Ohio 44622-0525	(330) 878-5595

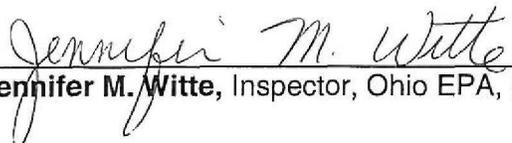
C. AREAS EVALUATED DURING INSPECTION

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

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

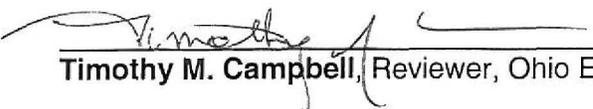
See attached letter.



 Jennifer M. Witte, Inspector, Ohio EPA, Southeast District Office

9/30/10

 Date



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

9/30/10

 Date