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

October 19, 2011

Re: Adams County
Hillcrest Nursing Home
Compliance Evaluation Inspection
Ohio EPA Permit No. 0PX00018
Correspondence (PWW)

Mrs. Jennifer Mann
Hillcrest Nursing Home
3564 Lawshe Road
Peebles, Ohio 45660

Dear Mrs. Mann:

On July 7, 2011, I conducted a compliance evaluation inspection at Hillcrest Nursing Home. The purpose of the inspection was to determine if the treatment plant was meeting the terms and conditions set forth in its NPDES permit.

1. PART III. 3.A. of the Permit states, All wastewater treatment works shall be operated in a manner consistent with the following: 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.

As stated in a previous letter, sludge management is difficult to complete with a dependable level of accuracy. Sludge management at this plant is imperative. At the time of my inspection sludge had washed out onto the sand beds. Sludge handling must be improved to ensure that this does not continue to occur in the future.

The current practice involves the utilization of a septic truck which does not give the operator the flexibility needed to operate the facility in a consistent fashion.

Ohio EPA has had issues and concerns with Hillcrest Nursing Home for over twenty years. A few years ago Ohio EPA was ready to conduct an enforcement action against the facility. Just before Provider Services obtained ownership of

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the facility, the previous owners made an effort to regain compliance by altering the configuration of the plant and the enforcement action was placed on hold. The plant has improved a great deal and Mr. Burton has done an excellent job learning about the plant and trying to operate the plant as well as can be expected.

Wastewater at a facility of this type is very difficult to treat. The wastewater flows and pollutant concentrations at Hillcrest do not resemble typical flows and pollutant concentrations found at wastewater plants like Peebles or Winchester. Hillcrest nursing homes flows are irregular due to cleaning schedules and meal periods, possess unused and passed through medications, possess high amounts of disinfectants, and do not possess typical solid loadings since the majority of the residents are in diapers. All of these things combined make plant operation very difficult. The majority of nursing homes in the state send their wastewater to a publicly owned treatment works and do not treat their own wastewater. This allows for blending to minimize the negative aspects of nursing home wastewater before it is treated.

Ohio EPA requires that a sludge holding system be installed. Submit plans through our Permit to Install process for the sludge holding system within the next 90 days. Please contact Fred Snell for details at (740)-380-5423.

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code Chapter 6111.

Within 21 days from receipt of this letter submit a letter to this office outlining the reasons for the above permit violations and actions being taken to prevent further occurrences.

If there are any questions, please contact me at (740) 380-5277.

Sincerely,

Aaron Wolfe
Storm Water Coordinator
Division of Surface Water

AW/dh

Enclosure

c: Larry Burton
c: Chris Inverso, Provider Services

Scan Report and e-mail to:
Bryan Casey, Regional Director: bcasey@muskingum-valley.net
Mike Wisecarver: michael@wisecarverenvironmental.com
Jennifer Chaffin, Hillcrest Administrator: jchaffin@concord-care.net

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PX00018	OH0135402	July 7, 2011	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Hillcrest Nursing Home 3564 Lawshe Road Peebles, Ohio 45660	10:00 a.m.	September 1, 2008
	Exit Time	**Permit Expiration Date**
	11:30 a.m.	August 31, 2013

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Larry Burton	(937) 386-2522
Name, Address, & Title of Responsible Official	**Phone Number**
Jennifer Mann	(937) 386-2522

C. AREAS EVALUATED DURING INSPECTION

S	Permit	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	N/A	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
U	Facility Site Review	U	Sludge Storage/Disposal		Other
N/A	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 letter for concerns related to sludge handling.

Aaron Wolfe, Inspector, Ohio EPA, Southeast District Office — Date: 10-24-11

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date: 10/24/11