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**Ohio EPA**

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State of Ohio Environmental Protection Agency

STREET ADDRESS:

**Central District Office**

MAILING ADDRESS:

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

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

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

**Certified Mail #91 7108 2133 3932 74449 7235**

October 15, 2009

Mr. James Hoekstra  
P.O. Box 4102  
Newark, OH 43059-4102

Dear Mr. Hoekstra

Attached is a report regarding a Reconnaissance Inspection that Suzanne Matz and I from this office performed October 8, 2009 at the wastewater treatment plant (WWTP) serving your Marne Manor Mobile Home Park. This report also serves as a Notice of Violation for noncompliance with the applicable wastewater discharge permit.

Please read the report carefully and provide me in writing by November 2, 2009 actions you will take to prevent continued violations. Please be advised that failure to comply with your wastewater discharge permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

If there are questions I can be reached by e-mail at [jan.rice@epa.state.oh.us](mailto:jan.rice@epa.state.oh.us) or by telephone at 614-728-3850.

Sincerely,



Jan A. Rice  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Central District Office

c: Matthew Peoples

JAR/nsm Marne Manor MHP 10-8-09Rlcovltr

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



**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

<b>Permit No.</b> 4PV00119	<b>NPDES No.</b> OH0136123	<b>Date</b> 10/8/09	<b>Inspection Type</b> R	<b>Inspector</b> S	<b>Facility Type</b> 2
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**B. FACILITY DATA**

<b>Name and Location of Facility Inspected</b> Marne Manor LLC, Wastewater Treatment Plant (WWTP) 12483 Marne Road NE Newark, Ohio 43055	<b>Entry Time</b> 12:30 P.M.	<b>Permit Effective Date</b> 7/1/05
	<b>Exit Time</b> 12:45 P.M.	<b>Permit Expiration Date</b> 6/30/10

<b>Name(s) and Title(s) of On-Site Representative(s)</b> Unannounced site visit. Arrangements not made to meet with on-site representative	<b>Phone Number(s)</b>
<b>Name(s) Address and Title(s) of Operator of Record</b> Matthew Peoples, Operator, 261 Powder Horn Place, Canal Winchester, Ohio 43110	<b>Phone Number(s)</b> 614-834-4031
<b>Name, Address and Title of Responsible Official</b> James Hoekstra, Owner, P.O. Box 4102, Newark, Ohio 43058-4102	<b>Phone Number</b> 740-728-6240

**C. AREAS EVALUATED DURING INSPECTION** (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

- S Permit
- N/M Records/Reports - reported flows do not reflect the estimated daily flow discharged from the WWTP
- S/N Operations & Maintenance - Mr. Peoples is certified as a Class III WWTP operator. Mr. Hoekstra is certified a Class A Limited WWTP operator.
- M Facility Site Review - the sand filter must be kept free of vegetation and sand in the filter should be uniformly level to allow even dispersal of wastewater across the sand surface.
- N Collection System
- U Flow Measurement - the permit requires that wastewater discharged, in gallons per day, be reported once per month. The sample type shown in the permit is Total Estimate. This means that the permittee should report once each month an estimate of the wastewater discharged from the WWTP on one day. The permittee should evaluate the volume of wastewater discharged particularly during wet weather periods of time to determine whether or not flow increases significantly due to infiltration/inflow of ground/surface water into the WWTP.
- N Laboratory
- U/N Effluent/Receiving Waters - wastewater discharge permit effluent limitations violations are listed in Attachment "A".
- N/N Sludge Storage/Disposal
- N Pretreatment
- N Compliance Schedules
- S Self-Monitoring Program

**D. SUMMARY OF FINDINGS/COMMENTS:** A Permit to Install was issued May 13, 2005 for construction of this WWTP which was placed into service in 2006. Even though installation of this WWTP corrected the problem of a failing onsite treatment system it has not yet demonstrated consistent wastewater discharge permit compliance. Attachment "A" provides a list of effluent limitation violations that occurred from 9/1/07 through 8/31/09. Attachment "B" lists monitoring frequency violations that occurred from 9/1/07 through 8/31/09. Continued violations are unacceptable.

Jan Rice  
Jan Rice, Inspector, Ohio EPA, Central District Office

Anthony Hanes  
Anthony Hanes, Reviewer, Ohio EPA, Central District Office

10/15/09  
Date

10/19/09  
Date

Attachment "A"  
 Marne Manor MHP  
 Effluent Limitations Violations  
 Period of review 9/1/07 - 8/31/09

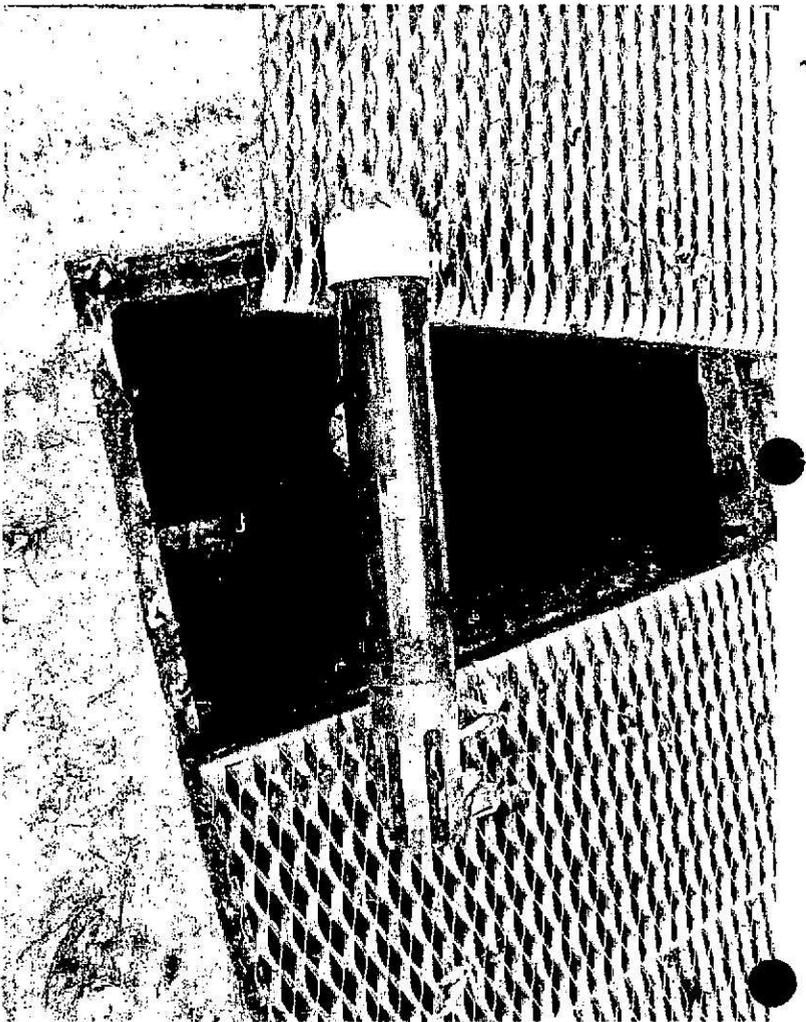
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PV00119*AD	December 2007	001	00530	Total Suspended Solids	30D Conc	12	20.	12/1/2007
4PV00119*AD	December 2007	001	80082	CBOD 5 day	30D Conc	10	26.	12/1/2007
4PV00119*AD	December 2007	001	00530	Total Suspended Solids	7D Conc	18	20.	12/15/2007
4PV00119*AD	December 2007	001	80082	CBOD 5 day	7D Conc	15	26.	12/15/2007
4PV00119*AD	December 2007	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	12/16/2007
4PV00119*AD	March 2008	001	00530	Total Suspended Solids	30D Conc	12	22.	3/1/2008
4PV00119*AD	March 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	29.4	3/1/2008
4PV00119*AD	March 2008	001	80082	CBOD 5 day	30D Conc	10	20.	3/1/2008
4PV00119*AD	March 2008	001	00530	Total Suspended Solids	7D Conc	18	22.	3/15/2008
4PV00119*AD	March 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	29.4	3/15/2008
4PV00119*AD	March 2008	001	80082	CBOD 5 day	7D Conc	15	20.	3/15/2008
4PV00119*AD	March 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	3/19/2008
4PV00119*AD	June 2008	001	00530	Total Suspended Solids	30D Conc	12	26.	6/1/2008
4PV00119*AD	June 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	15.1	6/1/2008
4PV00119*AD	June 2008	001	80082	CBOD 5 day	30D Conc	10	11.	6/1/2008
4PV00119*AD	June 2008	001	00530	Total Suspended Solids	7D Conc	18	26.	6/8/2008
4PV00119*AD	June 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	15.1	6/8/2008
4PV00119*AD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.2	6/12/2008
4PV00119*AD	August 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	5.5	8/1/2008
4PV00119*AD	August 2008	001	31616	Fecal Coliform	30D Conc	1000	2700.	8/1/2008
4PV00119*AD	August 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	5.5	8/15/2008
4PV00119*AD	August 2008	001	31616	Fecal Coliform	7D Conc	2000	2700.	8/15/2008
4PV00119*AD	December 2008	001	00530	Total Suspended Solids	30D Conc	12	24.	12/1/2008
4PV00119*AD	December 2008	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	29.	12/1/2008
4PV00119*AD	December 2008	001	80082	CBOD 5 day	30D Conc	10	22.	12/1/2008
4PV00119*AD	December 2008	001	00530	Total Suspended Solids	7D Conc	18	24.	12/15/2008
4PV00119*AD	December 2008	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	29.	12/15/2008
4PV00119*AD	December 2008	001	80082	CBOD 5 day	7D Conc	15	22.	12/15/2008

Attachment "B"  
 Marne Manor MHP  
 Frequency Violations  
 Period of review 9/1/07 - 8/31/09

Permit No	Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
4PV00119*AD	November 2007	001	00010	Water Temperature	1/Week	1	0	11/01/2007
4PV00119*AD	November 2007	001	00083	Color, Severity	1/Week	1	0	11/01/2007
4PV00119*AD	November 2007	001	01330	Odor, Severity	1/Week	1	0	11/01/2007
4PV00119*AD	November 2007	001	01350	Turbidity, Severity	1/Week	1	0	11/01/2007
4PV00119*AD	March 2009	001	00010	Water Temperature	1/Week	1	0	03/01/2009
4PV00119*AD	March 2009	001	00083	Color, Severity	1/Week	1	0	03/01/2009
4PV00119*AD	March 2009	001	01330	Odor, Severity	1/Week	1	0	03/01/2009
4PV00119*AD	March 2009	001	01350	Turbidity, Severity	1/Week	1	0	03/01/2009
4PV00119*AD	June 2009	001	00010	Water Temperature	1/Week	1	0	06/08/2009
4PV00119*AD	June 2009	001	00083	Color, Severity	1/Week	1	0	06/08/2009
4PV00119*AD	June 2009	001	01330	Odor, Severity	1/Week	1	0	06/08/2009
4PV00119*AD	June 2009	001	01350	Turbidity, Severity	1/Week	1	0	06/08/2009
4PV00119*AD	August 2009	001	00010	Water Temperature	1/Week	1	0	08/01/2009
4PV00119*AD	August 2009	001	00083	Color, Severity	1/Week	1	0	08/01/2009
4PV00119*AD	August 2009	001	01330	Odor, Severity	1/Week	1	0	08/01/2009
4PV00119*AD	August 2009	001	01350	Turbidity, Severity	1/Week	1	0	08/01/2009
4PV00119*AD	August 2009	001	00056	Flow Rate	1/Month	1	0	08/01/2009
4PV00119*AD	August 2009	001	00010	Water Temperature	1/Week	1	0	08/08/2009
4PV00119*AD	August 2009	001	00083	Color, Severity	1/Week	1	0	08/08/2009
4PV00119*AD	August 2009	001	01330	Odor, Severity	1/Week	1	0	08/08/2009
4PV00119*AD	August 2009	001	01350	Turbidity, Severity	1/Week	1	0	08/08/2009
4PV00119*AD	August 2009	001	00010	Water Temperature	1/Week	1	0	08/15/2009
4PV00119*AD	August 2009	001	00083	Color, Severity	1/Week	1	0	08/15/2009
4PV00119*AD	August 2009	001	01330	Odor, Severity	1/Week	1	0	08/15/2009
4PV00119*AD	August 2009	001	01350	Turbidity, Severity	1/Week	1	0	08/15/2009
4PV00119*AD	August 2009	001	00010	Water Temperature	1/Week	1	0	08/22/2009
4PV00119*AD	August 2009	001	00083	Color, Severity	1/Week	1	0	08/22/2009
4PV00119*AD	August 2009	001	01330	Odor, Severity	1/Week	1	0	08/22/2009
4PV00119*AD	August 2009	001	01350	Turbidity, Severity	1/Week	1	0	08/22/2009

Attachment "A"  
 Marne Manor MHP  
 Effluent Limitations Violations  
 Period of review 9/1/07 - 8/31/09

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PV00119*AD	March 2009	001	00530	Total Suspended Solids	30D Conc	12	168.	3/1/2009
4PV00119*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	45.1	3/1/2009
4PV00119*AD	March 2009	001	80082	CBOD 5 day	30D Conc	10	23.	3/1/2009
4PV00119*AD	March 2009	001	00530	Total Suspended Solids	7D Conc	18	168.	3/22/2009
4PV00119*AD	March 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	4.5	45.1	3/22/2009
4PV00119*AD	March 2009	001	80082	CBOD 5 day	7D Conc	15	23.	3/22/2009
4PV00119*AD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	3/26/2009
4PV00119*AD	June 2009	001	00530	Total Suspended Solids	30D Conc	12	46.	6/1/2009
4PV00119*AD	June 2009	001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	18.2	6/1/2009
4PV00119*AD	June 2009	001	80082	CBOD 5 day	30D Conc	10	34.	6/1/2009
4PV00119*AD	June 2009	001	00530	Total Suspended Solids	7D Conc	18	46.	6/15/2009
4PV00119*AD	June 2009	001	00610	Nitrogen, Ammonia (NH3)	7D Conc	1.5	18.2	6/15/2009
4PV00119*AD	June 2009	001	80082	CBOD 5 day	7D Conc	15	34.	6/15/2009
4PV00119*AD	August 2009	001	31616	Fecal Coliform	30D Conc	1000	8600.	8/1/2009
4PV00119*AD	August 2009	001	31616	Fecal Coliform	7D Conc	2000	8600.	8/15/2009
4PV00119*AD	August 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.3	8/20/2009



**Figure 3.** This photograph shows that a disinfection tablet dispenser tube is empty. Disinfection must occur from May 1 through October 31 each year.



**Figure 4.** This photograph shows that a dechlorination tablet dispenser tube is empty. Dechlorination must occur from May 1 through October 31 each year.



**Figure 1.** Photograph taken looking north towards the Marne Manor WWTP. A fence should be installed around this WWTP to prevent vandalism as well as to prevent anyone from removing grates and accidentally falling into a tank.



**Figure 2.** Photograph taken looking west across the WWTP slow sand filter. Sand within the filter needs to be uniformly level to allow an even distribution of wastewater when dosing occurs. Vegetation needs to be removed from the filter.

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PV0010120100720\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High

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www.epa.state.oh.us

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

**CERTIFIED MAIL #91 7108 2133 3932 4449 4593**

July 20, 2010

Mr. Gayle Scott  
Pleasant Acres MHP  
P.O. 4205  
Newark, OH 43058-4205

Re: **4PV00101/OH0120910**  
**RECONNASANCE INSPECTION**  
**FRANKLIN COUNTY**

Dear Mr. Scott:

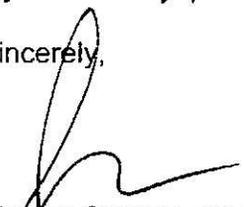
On July 12, 2010, a Reconnaissance Compliance Inspection was conducted at the Pleasant Acres Wastewater Treatment Plant (WWTP). Gary Benett, representing TCCI Laboratory's and myself, met on-site for the inspection.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit. At the time of this inspection, the plant appeared to be operating satisfactorily.

The inflow and infiltration study performed by Bird and Bull identified the "old portion" of the collection system needs to be lined or replaced. Please provide this office with a schedule for the lining or replacement of the old portion of your sanitary sewer. In addition, this office understands you are currently working with Franklin County Sanitary Engineers office to connect to the Darbydale sanitary sewer system. Please resolve your issues quickly and connect to the Darbydale sanitary sewer system to avoid continued degradation to the Big Darby watershed from your wastewater treatment plant discharge.

If you have any questions feel free to contact me at (614) 728-3847.

Sincerely,



Sheree Gossett-Johnson  
Environmental Specialist II  
Compliance/Enforcement Section  
Division of Surface Water

c: Gary Benett, Operator /T.C.C.I laboratories  
David Doko, AGO

SGJ/nsm Pleasant access July 2010

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

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**NPDES COMPLIANCE INSPECTION REPORT**

**Section A: National Data System Coding**

<b>Permit #</b>	<b>NPDES</b>	<b>Mo/Day/Yr</b>	<b>Insp. Type</b>	<b>Inspector</b>	<b>Fac Type</b>
OH0120910	4PV00101	7/12/2010	R	S	1

**Section B: Facility Data**

<b>Facility Name:</b>	<u>Pleasant Acres MHP</u>	<b>Entry Time</b>	<b>Permit Eff. Date</b>
<b>Address:</b>	<u>6106 London-Groveport Rd</u>	^4:00 PM	1-Apr-06
<b>City/State/Zip:</b>	<u>Grove City, Ohio 43123</u>	<b>Exit Time</b>	<b>Permit Exp. Date</b>
		^4:30 PM	31-Mar-11

**On-Site Representatives**

**Name:** TCCI, Gary Bennett  
**Title:** Operator  
**Phone:** (740) 342-1110

**Responsible Official**

**Name/Title:** Gayle Scott  
**Address:**  
**Phone:**

**Section C: Areas Evaluated During Inspection:**

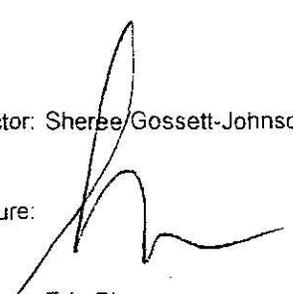
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not-Evaluated)

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

**Section D: Summary of Findings/Comments:**

**Name of Inspector:** Sherree Gossett-Johnson

Ohio EPA, Central District Office

**Signature:** 

**Date:** 7/15/10

**Name of Reviewer:** Erin Sherer

Ohio EPA, Central District Office

**Signature:** 

**Date:** 7/16/10

Sections E thru K: Complete on all inspections as appropriate. (N/A - Not Applicable N/E - Not Evaluated)

**Section E. Permit Verification**

	Yes	No	N/A	N/E
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	X			
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	X			
(c) PRODUCT(S) AND PRODUCTION RATES CONFORM WITH PERMIT APPLICATION	X			
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT		X		
(e) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT	X			
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION			X	
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES				X
(h) ALL DISCHARGES ARE PERMITTED	X			
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN THE PERMIT	X			

COMMENTS/STATUS:

The Inflow and infiltration was found to be due to the older section of the collection system. Please line or replace this section..

**Section F. Compliance Schedule and Violations**

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE LAST INSPECTION	X			
(b) PERMITTEE IS TAKING ACTION TO RESOLVE VIOLATIONS		X		
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	X			
(d) COMPLIANCE SCHEDULE CONTAINED IN PERMIT	X			
(e) PERMITTEE IS MEETING SCHEDULE OF COMPLIANCE				X

COMMENTS/STATUS:

You are in non-compliance of your NPDES permit compliance schedule because your sanitary sewer has not connected to a regional system.

**Section G. Operation and Maintenance**

TREATMENT WORKS:

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

	Yes	No	N/A	N/E
(a) STANDBY POWER AVAILABLE: GENERATOR DUAL FEED		X		
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	X			
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	X			
(d) SUFFICIENT STAFF PROVIDED #SHIFTS 1 DAYS/WR 5	X			
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS PROVIDED BY PERMIT- CLASS: I	X			
(f) ROUTINE AND PREVENTATIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME				X
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION		X		
(h) O&M MANUAL PROVIDED AND MAINTAINED		X		
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION		X		
(j) REG. AGENCY NOTIFIED OF BYPASSES--on MORs 1-800 #		X		
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED		X		

COMMENTS/STATUS:



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#### Detailed Results:

- Delivered, July 23, 2010, 9:14 am, NEWARK, OH 43055
- Notice Left, July 22, 2010, 9:18 am, NEWARK, OH 43058

### Notification Options

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No FEAR Act EEO Data

FOIA



United States Postal Service



United States Postal Service

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PV0012020090827\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

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www.epa.state.oh.us

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

**Certified Mail #91 7108 2133 3932 4449 7662**

August 27, 2009

Marlin Trace Investments II, Ltd.  
15111 State Route 664 South  
Logan, OH 43138

Dear Sir or Madam:

Attached is a report regarding a Reconnaissance Inspection that Kelly Thiel and I from this office performed July 8, 2009 at the wastewater treatment plant (WWTP) serving the Marlin Trace Investments II Mobile Home Park (Hillview MHP) in Fairfield County.

The wastewater discharge permit for this MHP contains a compliance schedule requiring WWTP improvements. The compliance schedule was revised in a permit modification which became effective January 1, 2009. The revised schedule indicates that construction of the improvements must be initiated by July 1, 2009. Construction completion and compliance with final effluent limitations must occur by January 1, 2010.

During the inspection we noted that construction has not been initiated. In addition, review of this office's records indicates discharge monitoring reports are not being submitted and there is apparently no certified wastewater operator overseeing the WWTP.

Based on what has become chronic noncompliance you are leaving this office no choice other than to consider enforcement action in response to violations. This office will discuss with the Fairfield Department of Health the possibility of not renewing the 2010 operating license for this mobile home park.

If you have questions I can be reached by telephone at 614-728-3850 or by e-mail at [jan.rice@epa.state.oh.us](mailto:jan.rice@epa.state.oh.us).

Sincerely,

Jan A. Rice  
Environmental Specialist  
Division of Surface Water  
Central District Office

JAR/nsm Hillview MHP 7-8-09 RI covltr

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

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**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

<b>Permit No.</b> 4PV00120*BD	<b>NPDES No.</b> OH0136280	<b>Date</b> 7/8/09	<b>Inspection Type</b> R	<b>Inspector</b> S	<b>Facility Type</b> 2
----------------------------------	-------------------------------	-----------------------	-----------------------------	-----------------------	---------------------------

**B. FACILITY DATA**

<b>Name and Location of Facility Inspected</b> Marlin Trace Investments II Mobile Home Park 3424 B.I.S. Road, Lancaster, Ohio 43130	<b>Entry Time</b> 11:30 A.M.	<b>Permit Effective Date</b> 7/1/05
	<b>Exit Time</b> 11:40 A.M.	<b>Permit Expiration Date</b> 6/30/10

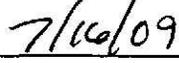
<b>Name(s) and Title(s) of On-Site Representative(s)</b>	<b>Phone Number(s)</b>
Unannounced site visit. No on-site representative contacted.	
<b>Name(s) Address and Title(s) of Operator of Record</b>	<b>Phone Number(s)</b>
<b>Name, Address and Title of Responsible Official</b>	<b>Phone Number</b>
Mark Anthony, 15111 SR 664 S, Logan, Ohio Owner	(cell) 740-974-6265

**C. AREAS EVALUATED DURING INSPECTION** (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

- U Permit – permit requires that wastewater treatment plant (WWTP) upgrade be underway by 7/1/09. Construction has not been initiated. The permit requires that the WWTP be under supervision of a Class 1 state certified operator. There is no record in this office that a certified operator is overseeing this WWTP.
- N/U Records/Reports - discharge monitoring reports have not been submitted since 2/29/08.
- N Operations & Maintenance
- U Facility Site Review – construction of plant upgrade not initiated as required.
- N Collection System
- N Flow Measurement
- N Laboratory
- N/N Effluent/Receiving Waters
- N/N Sludge Storage/Disposal
- N Pretreatment
- U Compliance Schedules – permittee failed to initiate construction by 7/1/09.
- U Self-Monitoring Program - discharge monitoring reports have not been submitted since 2/29/08.

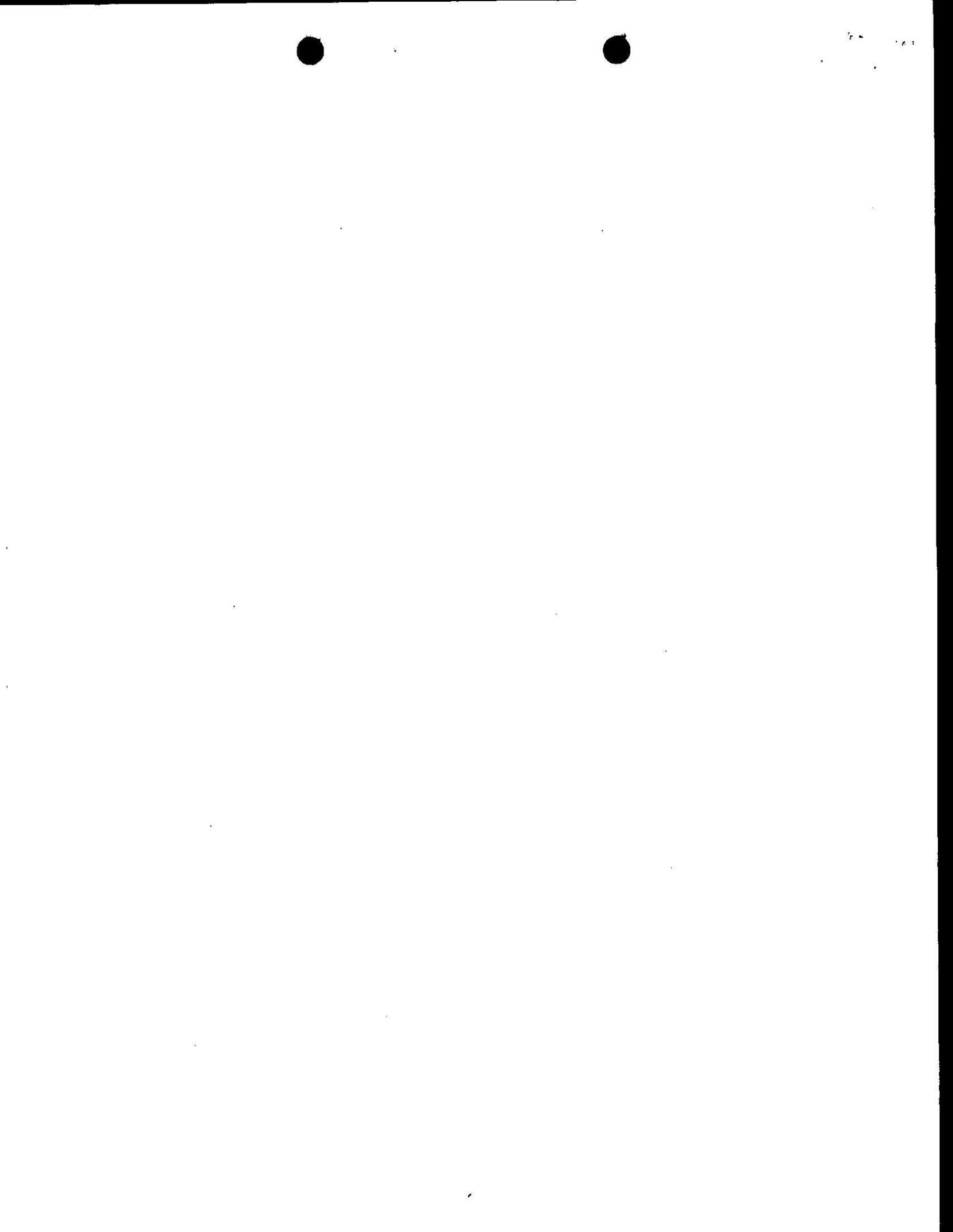
**D. SUMMARY OF FINDINGS/COMMENTS:** This permittee is in noncompliance due to failure to submit discharge monitoring reports; failure to initiate WWTP upgrade construction by 7/1/09 and failure to hire a state certified operator to oversee the WWTP. The permittee is leaving this office no choice other than to consider enforcement action in response to chronic noncompliance. This office will discuss with the Fairfield Department of Health the possibility of not renewing the 2010 operating license for this mobile home park.

  
Jan Rice, Inspector, Ohio EPA, Central District Office

  
Date

  
Erin Sherer, Reviewer, Ohio EPA, Central District Office

  
Date



NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PB0001720090828\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



4PE0017C

State of Ohio Environmental Protection Agency

STREET ADDRESS:

**Central District Office**

MAILING ADDRESS:

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

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

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

**Certified Mail #91 7108 2133 3932 4449 7709**

August 28, 2009

Mr. Edward Drobina  
Service Manager  
City of Pickerington  
200 Hereford Drive  
Pickerington, OH 43147

Dear Mr. Drobina:

This is a Notice of Violation for exceeding the wastewater discharge permit final effluent limitations for total suspended (TSS) and total dissolved solids (TDS) from January through July, 2009. Attachment "A" in this letter lists the violations.

This letter is also in response to your July 23, 2009, e-mail indicating that the city has contracted with Enviro Science to perform a Biocriteria Study of Sycamore Creek. This office has no objection to additional study of Sycamore Creek. However, this office very strongly objects to continued violation of the city's wastewater discharge permit total dissolved solids (TDS) effluent limitation.

The city was issued its current wastewater discharge permit on December 7, 2007. The wastewater discharge permit requires compliance with an interim TDS effluent limitation by January 1, 2009. As is evident from the July 22, 2009 preliminary compliance review notification sent to you, compliance has not yet been achieved.

Continued noncompliance is unacceptable particularly when contrasted against possible remedial measures proposed by the city's consultant in a report dated July 7, 2008. Your e-mail indicates that the city has decided to intentionally delay implementation of a solution to the TDS problem as proposed in the consultant's report. Instead of implementing a solution to an already documented problem, the city is choosing to study if the problem really does exist or not. This type of study should have been done before any permit limits became effective; the Ohio EPA allots time in a permit before limits become effective for this very reason and to allow the facility time to come up with the best solution for meeting the limits. The choice of the city to wait until after permit limits are effective to further study the matter and to not comply with its limits is not acceptable. This choice will unfortunately result in continuation of stream biocriteria impairment already documented by this office and constitutes an intentional violation of the Clean Water Act.

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



Handwritten mark

Mr. Edward Drobrina  
Service Manager  
City of Pickerington  
Page -2-

In a letter to you dated March 26, 2009, this office advised the city to not pursue an approach of paying a penalty whenever a TDS violation occurs. The city has been aware for an extended period of time that it must comply with its wastewater discharge permit TDS effluent limitation yet it is only now pursuing further stream study. Such action should have occurred quite some time ago. The city must comply with its NPDES permit limit for total dissolved solids even while studying the matter further. Immediate options are available to you such as hauling the water treatment plant backwash water or diluting it so as to meet the NPDES limit.

Please inform this office, in writing, within ten days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions to be immediately taken to prevent any further violations. Your response should include dates, either actual or proposed, for completion of the actions.

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

If you have questions I can be reached by e-mail at [mike.gallaway@epa.state.oh.us](mailto:mike.gallaway@epa.state.oh.us) or by telephone at 614-728-3843.

Sincerely,



Mike Gallaway  
Manager  
Division of Surface Water  
Central District Office

Enclosure

Attachment "A"  
 City of Pickerington WWTP  
 Effluent Limitation Violations

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00017*LD	January 2009	001	00530	Total Suspended Solids	30D Conc	6.0	6.03077	1/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	30D Conc	6.0	20.3333	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Conc	9.0	52.7333	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	30D Qty	36.3	111.817	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Qty	54.6	224.598	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Conc	9.0	22.3333	2/8/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Qty	54.6	193.787	2/8/2009
4PB00017*LD	June 2009	001	00515	Residue, Total Dissolv	30D Conc	1710	2011.25	6/1/2009
4PB00017*LD	July 2009	001	00515	Residue, Total Dissolv	30D Conc	1710	2255.66	7/1/2009

11



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\*4PV0000820100723\*

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State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

**Central District Office**

**MAILING ADDRESS:**

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

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

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

**CERTIFIED #91 7108 2133 3932 4449 4609**

July 23, 2010

George DeGraca  
K.D.M. Development  
642 Kreag Rd  
Pittsford, NY 14534

**Re: 4PV00008/OH0070980  
Oak Hills Mobile Home Park WWTP  
Compliance Inspection  
Franklin County**

Dear Mr. DeGraca:

Enclosed is the Compliance Inspection Report for the Oak Hills wastewater treatment plant (WWTP). This inspection was conducted on July 12, 2010 by Ohio EPA personnel. The purpose of this inspection was to evaluate the condition and operating capabilities of the WWTP.

At the time of the inspection, the facility equipment was found to be unacceptable. During wet weather (to avoid sewage overflows from the sand filters the operator must haul raw sewage to another wastewater treatment plant for treatment. In addition, the sludge holding tank does not provide adequate capacity forcing the operator to haul to another wastewater treatment plant quite often. Due to a lack of plant capacity with respect to raw sewage and sludge, the number of hours the operator must use operating this plant is excessive and very costly to you.

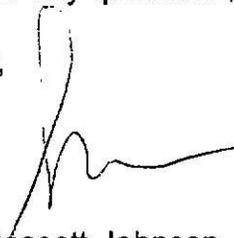
To permanently correct the by-passing and a host of other violations, the Parks sewage needs to be conveyed to the Darbydale WWTP for treatment and the Park WWTP to be taken off-line. Until the connection to Darbydale WWTP has been completed, please contract with an operator to provide twenty-four hour operational surveillance. With additional surveillance, the by-passes that occur outside the forty hours per week shall be prevented.

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

George DeGraca  
K.D.M. Development  
Page -2-

If you have any questions, comments, or concerns, please call me at (614) 728-3847.

Sincerely,



Sheree Gossett-Johnson  
Environmental Specialist II  
Enforcement and Compliance  
Division of Surface Water  
Central District Office

Enclosure

c: Wendy Nelson, Manager Oak Hills Mobile Home Park  
Gary Benett, Operator /T.C.C.I laboratories  
David Doko, AGO

SGJ/nsm Oakhill July 10, 2010

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Mo/Day/Yr	Insp. Type	Inspector	Watershed
4PV00008	OH0070980	7/12/2010	R	S	Darby

Section B: Facility Data

Facility Name:	<u>Oak Hills MHP</u>	Entry Time	Permit Eff. Date
Address:	<u>5965 Harrisburg-Georgesville Rd.</u>	^2:30 pm	July 1, 2003
City/State/Zip:	<u>Grove City, Ohio 43123</u>	Exit Time	Permit Exp. Date
		^3:30 pm	June 30, 2008

On-Site Representatives

Name: Wendy Nelson  
Title: Manager

Phone: 614 877-3500

Responsible Official

Name/Title: George Dagraca  
Address: 642 Kread Rd, Pittsford NY 14534  
Phone:

Section C: Areas Evaluated During Inspection:

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

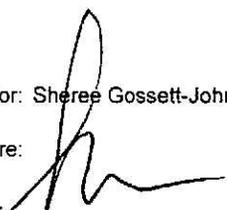
Permit	U	Effluent/ Receiving Waters	M
Records/Reports	S	Sludge Storage/ Disposal	U
Operations & Maint.	M	Pretreatment	NE
Facility Site Review	S	Compliance Schedules	NE
Collection System	NE	Self-Monitoring Program	S
Flow Measurement	M	Other	
Laboratory	NE		

Section D: Summary of Findings/Comments:

See cover letter.

Name of Inspector: Sheree Gossett-Johnson

Ohio EPA, Central District Office

Signature: 

Date: 7/15/10

Name of Reviewer: Erin Sherer

Ohio EPA, Central District Office

Signature: 

Date: 7/16/10

Sections E thru K: Complete on all inspections as appropriate. (N/A - Not Applicable N/E - Not Evaluated)

**Section E. Permit Verification**

	Yes	No	N/A	N/E
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	X			
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	X			
(c) PRODUCT(S) AND PRODUCTION RATES (Industrial)				X
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT	*	X		
(e) TREATMENT PROCESSES ARE IN PERMIT APPLICATION/BRIEFING MEMO	X			
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION		X		
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES				X
(h) ALL DISCHARGES ARE PERMITTED		X		
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE IN THE PERMIT	*	X		

COMMENTS/STATUS:

Sanitary Sewer Overflows have been averted by Hauling raw sewage to another wastewater treatment plant.

**Section F. Compliance Schedule and Violations**

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE LAST INSPECTION		X		
(b) PERMITTEE IS TAKING ACTION TO RESOLVE VIOLATIONS	*X			
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	X			
(d) COMPLIANCE SCHEDULE CONTAINED :				X
(e) PERMITTEE IS MEETING SCHEDULE OF COMPLIANCE				X

COMMENTS/STATUS:

Actions to resolve the I&I is not known.

**Section G. Operation and Maintenance**

TREATMENT WORKS:

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

	Yes	No	N/A	N/E
(a) STANDBY POWER AVAILABLE: GENERATOR DUAL FEED	*	X		
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	X			
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	X			
(d) SUFFICIENT STAFF PROVIDED #SHIFTS DAYS/WK	X			
(e) OPERATOR HOLDS UNEXPIRED LICENSE OF CLASS I:	X			
(f) ROUTINE AND PREVENTATIVE MAINT.SCHEDULED/PERFORMED ON TIME	X			
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION				X
(h) O&M MANUAL PROVIDED AND MAINTAINED				X
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION		X		
(j) REG. AGENCY NOTIFIED OF BYPASSES--on MORs 1-800 #	X			
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPEC	X			

COMMENTS/STATUS:

USEPA NPDES No.  
Ohio NPDES No.

OH0070980  
4PV00008

**Section G. Operation & Maintenance (continued)**

	Yes	No	N/A	N/E
COLLECTION SYSTEM:				
(a) PERCENT COMBINED SYSTEM: %				
(b) COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION CSO SSO				X
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)				X
(d) CSO O&M PLAN PROVIDED AND IMPLEMENTED				X
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT				X
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM				X
(g) LIFT STATION ALARMS PROVIDED AND MAINTAINED	X			
(h) ARE LIFT STATIONS WITH PERMANENT STANDBY POWER OR EQUIV.		X		
(i) ANY INFLOW/INFILTRATION PROBLEM, OR ANY MAJOR REPAIRS TO THE COLLECTION SYSTEM SINCE LAST INSPECTION (SEPARATE SEWER SYSTEM)				X
(j) ANY COMPLAINTS SINCE LAST INSPECTION OF BASEMENT FLOODING			X	
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	X			

COMMENT/STATUS:  
See cover letter

**Section H. Sludge Management**

	Yes	No	N/A	N/E
(a) SLUDGE MANAGEMENT PLAN (SMP)		X		
IF YES, DATE SUBMITTED: APPROVAL #				
(b) SLUDGE MANAGEMENT PLAN CURRENT			X	
(c) SLUDGE ADEQUATELY DISPOSED OF: METHOD-	X			
(d) IS SLUDGE INCINERATED				X
IF YES, ASH IS DISPOSED AT:				
(e) IS SLUDGE DISPOSAL CONTRACTED				X
IF YES, CONTRACTOR NAME:				
(f) HAS AMOUNT OF SLUDGE CHANGED SIGNIFICANTLY SINCE LAST INSPECTION		X		
(g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT	X			
(h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP			X	
(i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW				X
(j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE	X			
(k) IS SLUDGE ADEQUATELY PROCESSED (digestion, dewatering, pathogen control)				X

COMMENTS/STATUS:  
Due to excessive I&I sludge 3000+ gallons per month of sludge is hauled to Columbus WWTP.

**Section I. Self Monitoring Program**

**Part 1. Flow Measurement**

	Yes	No	N/A	N/E
(a) FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED	X			
TYPE OF FLOW MEASURING:				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration):				X
(c) SECONDARY INST. (totalizer, recorder, etc.) PROPERLY OPERATED & MAINT				X
(d) FLOW MEASURING EQUIP. ADEQUATE FOR EXPECTED RANGES OF FLOWS				X
(e) ACTUAL FLOW DISCHARGED IS MEASURED				
(f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY:				
DAILY MONTHLY				
WEEKLY				

COMMENTS/STATUS:  
Hour meters on dosing pumps are used to calculate the flow allowed as a temporary measure for flow calculation until this MHP is connected to the Darbydale WWTP collection system.

**Section I. Self Monitoring Program (continued)**

**Part 2. Sampling**

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED IN THE PERMIT	X			
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	X			
(c) PERMITTEE USES REQUIRED SAMPLING METHOD				X
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE				X
(i) SAMPLES REFRIGERATED DURING COMPOSITING				X
(ii) PROPER PRESERVATION TECHNIQUES USED				X
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3				X
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS, INCLUDING ALL ORIGINAL STRIP CHART RECORDS (e.g., continuous monitoring instrumentation, calibration, and maintenance records)				X
(f) ADEQUATE RECORDS MAINTAINED (e.g., sampling date, time, exact location, etc.)				X

**Part 3. Laboratory**

	Yes	No	N/A	N/E
(a) EPA APP. ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)				X
(b) IF ALTERNATE PROCEDURES ARE USED, PROPER APPROVAL OBTAINED				X
(c) ANALYSIS PERFORMED MORE FREQUENTLY THAN REQUIRED	X			
(d) IF (c) IS YES, ARE RESULTS RECORDED				
(e) COMMERCIAL LABORATORY USED	X			
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB: <u>All parameters</u>				
(2) LAB NAME: <u>TCCI</u>				
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED			X	
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	X	X		
(h) ADEQUATE RECORDS MAINTAINED	X			
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE <u>NA</u>				Satisfactory Marginal Unsatisfactory

COMMENTS/STATUS:



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Environmental  
Protection Agency

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8/2/11

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

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Certified Mail #91 7108 2133 3932 1838 5285

July 28, 2011

The Honorable Duane Flowers  
Mayor, Village of Hanover  
200 New Home Drive NE  
Hanover, OH 43055-8927

Dear Mr. Flowers:

This letter is in response to your June 17, 2011, letter to Jan Rice of my staff regarding the village's wastewater treatment plant. Items contained in your letter are included below in italics for reference. My responses are as follows:

1. *The Village of Hanover is working dillgently to bring and keep the wastewater system in continual compliance. We have relied on the License design engineer, the Ohio EPA and have contracted with a license professional operator to meet the strict requirements. We have made significant progress in the last year by changing operators but we do realize that we have not made 3 consecutive months of permit compliance. The Village is committed to eliminating NPDES violations. We have made significant repairs to the UV system and total repairs will be complete as the vendor returns the rebuilt equipment.*

This office appreciates the recent efforts to repair the ultraviolet (UV) disinfection system. However, this office is extremely puzzled and frustrated as to why the UV system was allowed to remain dysfunctional for over a year. This is extremely disturbing and does not reflect well on either Hanover or your wastewater treatment plant operator. Please note that bacteria limits are applicable from May – October, and Hanover has violated this limit every month since May 2010 until June 2011. Bacteria limits are designed to protect human health. Several of Hanover's fecal coliform violations have been 5 times the permit limit. This consistent long term noncompliance is inexcusable.

2. *The Village recognizes the WWTP's Class II classification. We suggest that the 20 hours per week be spread over 7 days and not limited to 5 days. Joe Hickman the operator states that the 7 day coverage gives the WWTP better coverage and increases the chances of meeting compliances. He also feels the village may want to request to the Ohio EPA consideration for reduced staffing based on dial-out system and emergency power at the plant and lift stations. The plant is design for 160,000 GPD but at this time and for the foreseeable future we understand that we will be operating at a much lower GPD. We are also receiving quotes for equipment that will allow the sampler to become flow paced.*

This office has no objection to your proposal to spread 20 hours per week over 7 days rather than be limited to 5 days. This office cannot consider your request for reduced staffing until consistent compliance is achieved.

- 3. One problem that was brought to the Village attention last month was the problem the operator was having getting equipment from Seimans, again we here in the village pay for the service of licensed professionals, approved manufacture/suppliers and operators but it seems that sometimes those entities just ignore the fact that they need to go the extra mile. We are now working with Seimans of New Jersey instead of Seimans of Ohio and believe they have our best interest in mind.*

Again, why just last month was the problem given more attention when this situation has been in existence for over a year? Further delays in completing the UV unit repairs are unacceptable.

- 4. The Village is currently talking to the county grant coordinator, Sue Spiker, to see if the Village would qualify for a grant to add a clarifier or filter. We also have talked to R-Caps on the same issue and they recommended we start at the county level first. It is my feeling that we truly need a clarifier but I am not a professional in this area and it seems all those who should know has a different opinion on what can be done.*

Please keep this office informed regarding your long term plan for providing consistent wastewater discharge permit compliance. The village's wastewater discharge permit expires September 30, 2011. The permit, when renewed, may include a compliance schedule for improvements necessary to provide consistent compliance.

If you have questions I can be reached by e-mail at [erin.sherer@epa.state.oh.us](mailto:erin.sherer@epa.state.oh.us) or by telephone at 614-728-3839.

Sincerely,



Erin Sherer  
Enforcement/Compliance Group Supervisor  
Division of Surface Water  
Central District Office

c: Bill Fry, Board of Public Affairs  
Joe Hickman, Operator

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7/14/11



Environmental  
Protection Agency

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

Certified Mail #91 7108 2133 3932 1838 5223

FILE COPY

July 12, 2011

Fairfield County Commissioners  
210 East Main Street  
Lancaster, OH 43130

**Re: Notice of Violation - Board of Commissioners Fairfield County National Pollutant Discharge Elimination System (NPDES) Ohio EPA Permits 4PG00028 Lakeside Estates and 4PG00030 Pleasant Lea Water Reclamation Facilities**

Dear Commissioners:

This correspondence serves as a final **Notice of Violation (NOV)** for noncompliance with requirements of your NPDES permit for the Lakeside Estates wastewater treatment plant (WWTP). NOV's dated March 12, 2007, and December 23, 2008 have previously been sent to the county regarding Lakeside Estates.

This correspondence also serves as a NOV regarding the Pleasant Lea WWTP.

Enforcement action which may include a penalty may be initiated unless Fairfield County submits documentation by July 25, 2011, demonstrating that construction of a new regional WWTP is moving forward on an expedited time frame to replace both the Lakeside Estates and Pleasant Lea WWTPs.

**Violations**

1. Violations of the NPDES discharge permit limitations have, and continue, to occur. Discharge monitoring reports submitted by Fairfield County personnel since January 2006 document permit limit violations. These violations are listed in Attachments A and B.
2. The Commissioners have not complied with the Lakeside Estates permit compliance schedule for construction of a new WWTP to replace both the Pleasant Lea and Lakeside Estates WWTPs. Each failure to meet an item of the compliance schedule constitutes additional, individual violations of your NPDES permit. These violations are listed in Attachment C.
3. Violation of the terms and conditions of NPDES Permits 4PG00028 and 4PG00030 is also a violation of Ohio Revised Code 6111.04 and 6111.07 which states:

*6111.04 (C) - No person to whom a permit has been issued shall place or discharge, or cause to be placed or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit without first receiving a permit from the director to do so.*

Central District Office  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

614 | 728 3778  
614 | 728 3898 (fax)  
www.epa.ohio.gov

*6111.07 Prohibited acts - prosecutions and injunction by attorney general. No person shall violate or fail to perform any duty imposed by sections 6111.01 to 6111.08 of the Revised Code or violate any order, rule, or term or condition of a permit issued or adopted by the director of environmental protection pursuant to those sections. Each day of violation is a separate offense.*

**Additional Information**

The Lakeside Estates WWTP has been placed on the Significant Non-compliance (SNC) List due to both final effluent limitation violations which occurred during the six month period of time ending in March 2011 and failure to meet compliance schedule milestones. SNC is a programmatic definition used to identify those facilities that should receive priority enforcement attention. In order to be removed from the SNC list without a formal enforcement action being initiated you must maintain final effluent limitation compliance for three consecutive months and the compliance schedule milestones must be achieved.

In a letter to this office dated October 28, 2010, Fairfield County indicated that funds had been dedicated to advance the project through detail design and property acquisition but, funds were not available to construct the project. Recent discussions with Mr. Tony Vogel, the county Director of Utilities, indicate that funding for this project has not yet been sought or applied for thus further delaying consistent wastewater discharge permit compliance.

Unless Fairfield County submits sufficient documentation by July 25, 2011, that demonstrates the intention to expeditiously comply with NPDES permit requirements, Ohio EPA may proceed with enforcement which may include a monetary penalty and issuance of Director's Final Findings and Orders. Please contact Mr. Jan Rice at 614-728-3850 or at [jan.rice@epa.ohio.gov](mailto:jan.rice@epa.ohio.gov) if you have any questions and/or would like to meet for further discussion of this matter.

Sincerely,



Erin Sherer  
Compliance & Enforcement Supervisor  
Division of Surface Water  
Central District Office

c: Mr. Tony Vogel, P.E., Director of Utilities, Fairfield County Utilities

Attachment A

Fairfield County Board of Commissioners - Lakeside Estates (Ohio EPA No.: 4PG00028)  
Effluent Limitations Violations (1/1/06 – 5/31/11)

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2006	00530	Total Suspended Solids	30D Qty	0.36	1.12415	1/1/2006
January 2006	00530	Total Suspended Solids	7D Qty	0.54	1.12415	1/1/2006
February 2006	00530	Total Suspended Solids	30D Qty	0.36	.51476	2/1/2006
February 2006	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.08	.09084	2/1/2006
February 2006	80082	CBOD 5 day	30D Qty	0.45	.6056	2/1/2006
April 2006	00530	Total Suspended Solids	30D Qty	0.36	.4542	4/1/2006
May 2006	00530	Total Suspended Solids	30D Qty	0.36	.42581	5/1/2006
May 2006	00530	Total Suspended Solids	7D Qty	0.54	.6056	5/1/2006
July 2006	00530	Total Suspended Solids	30D Qty	0.36	.4542	7/1/2006
October 2006	00530	Total Suspended Solids	30D Qty	0.36	.50341	10/1/2006
December 2006	00530	Total Suspended Solids	30D Qty	0.36	.43149	12/1/2006
December 2006	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.08	.0863	12/1/2006
February 2007	00610	Nitrogen, Ammonia (NH3)	7D Conc	3.9	4.6	2/1/2007
February 2007	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.08	.15178	2/1/2007
February 2007	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.12	.29599	2/1/2007
March 2007	00530	Total Suspended Solids	30D Qty	0.36	.36336	3/1/2007
September 2007	31616	Fecal Coliform	30D Conc	1000	1326.64	9/1/2007
September 2007	31616	Fecal Coliform	7D Conc	2000	8800.	9/1/2007
October 2007	31616	Fecal Coliform	7D Conc	2000	4600.	10/1/2007
March 2008	00530	Total Suspended Solids	30D Qty	0.36	2.49394	3/1/2008
March 2008	00530	Total Suspended Solids	7D Qty	0.54	2.37622	3/1/2008
March 2008	00530	Total Suspended Solids	7D Qty	0.54	2.61165	3/15/2008
April 2008	00530	Total Suspended Solids	30D Qty	0.36	.39194	4/1/2008
April 2008	00530	Total Suspended Solids	7D Qty	0.54	.56775	4/1/2008
June 2008	50060	Chlorine, Total Residu	1D Conc	0.019	.05	6/16/2008
July 2008	00530	Total Suspended Solids	30D Qty	0.36	.67282	7/1/2008
July 2008	00530	Total Suspended Solids	7D Qty	0.54	1.38985	7/8/2008

Attachment A (continued)

Fairfield County Board of Commissioners - Lakeside Estates (Ohio EPA No.: 4PG00028)  
 Effluent Limitations Violations (1/1/06 – 5/31/11)

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	5.9	8/11/2008
August 2008	00530	Total Suspended Solids	7D Qty	0.54	.67184	8/22/2008
August 2008	00300	Dissolved Oxygen	1D Conc	6.0	4.1	8/25/2008
June 2009	31616	Fecal Coliform	7D Conc	2000	6021.62	6/1/2009
June 2009	00300	Dissolved Oxygen	1D Conc	6.0	1.7	6/19/2009
July 2009	00530	Total Suspended Solids	7D Qty	0.54	.68887	7/1/2009
August 2009	00530	Total Suspended Solids	7D Qty	0.54	.73808	8/1/2009
August 2009	31616	Fecal Coliform	7D Conc	2000	8419.61	8/1/2009
September 2009	00530	Total Suspended Solids	7D Qty	0.54	.54126	9/1/2009
November 2009	00530	Total Suspended Solids	30D Qty	0.36	.39061	11/1/2009
November 2009	00530	Total Suspended Solids	7D Qty	0.54	.56775	11/1/2009
December 2009	00530	Total Suspended Solids	30D Qty	0.36	.86487	12/1/2009
December 2009	00530	Total Suspended Solids	7D Qty	0.54	.93868	12/8/2009
December 2009	00530	Total Suspended Solids	7D Qty	0.54	.64345	12/15/2009
January 2010	00530	Total Suspended Solids	30D-Qty	0.36	.37598	1/1/2010
February 2010	00530	Total Suspended Solids	30D Qty	0.36	.51381	2/1/2010
February 2010	00530	Total Suspended Solids	7D Qty	0.54	.66616	2/8/2010
February 2010	00530	Total Suspended Solids	7D Qty	0.54	.95382	2/22/2010
March 2010	00530	Total Suspended Solids	30D Qty	0.36	.59046	3/1/2010
March 2010	00530	Total Suspended Solids	7D Qty	0.54	.68887	3/8/2010
April 2010	00530	Total Suspended Solids	7D Qty	0.54	.6813	4/1/2010
April 2010	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.08	.11855	4/1/2010
April 2010	00610	Nitrogen, Ammonia (NH3)	7D Qty	0.12	.22861	4/1/2010
June 2010	31616	Fecal Coliform	7D Conc	2000	2800.	6/1/2010
October 2010	00530	Total Suspended Solids	30D Qty	0.36	.43149	10/1/2010
October 2010	00530	Total Suspended Solids	7D Qty	0.54	.62453	10/1/2010
October 2010	50060	Chlorine, Total Residu	1D Conc	0.019	.09	10/21/2010

Attachment A (continued)

Fairfield County Board of Commissioners - Lakeside Estates (Ohio EPA No.: 4PG00028)  
 Effluent Limitations Violations (1/1/06 – 5/31/11)

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2010	00530	Total Suspended Solids	30D Qty	0.36	.4542	12/1/2010
January 2011	00530	Total Suspended Solids	30D Qty	0.36	.41257	1/1/2011
February 2011	00530	Total Suspended Solids	30D Qty	0.36	.76836	2/1/2011
February 2011	00530	Total Suspended Solids	7D Qty	0.54	1.0598	2/8/2011
March 2011	00530	Total Suspended Solids	30D Qty	0.36	.62263	3/1/2011
March 2011	00530	Total Suspended Solids	7D Qty	0.54	.60939	3/1/2011
March 2011	00530	Total Suspended Solids	7D Qty	0.54	.63588	3/15/2011
May 2011	00530	Total Suspended Solids	30D Qty	0.36	1.8925	5/1/2011
May 2011	80082	CBOD 5 day	30D Qty	0.3	.66616	5/1/2011
May 2011	80082	CBOD 5 day	7D Qty	0.45	.66616	5/15/2011
May 2011	00530	Total Suspended Solids	7D Qty	0.54	1.8925	5/22/2011

**Attachment B**

Fairfield County Board of Commissioners - Pleasant Lea (Ohio EPA No.: 4PG00030) Outfall 001  
 Effluent Limitations Violations (1/1/06 – 5/31/11)

Reporting Period	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2006	00400	pH	1D Conc	9.0	9.2	7/21/2006
October 2007	00610	Nitrogen, Ammonia	30D Conc	2.0	7.9	10/1/2007
October 2007	00610	Nitrogen, Ammonia	30D Qty	0.30	.60421	10/1/2007
October 2007	00610	Nitrogen, Ammonia	7D Conc	3.0	17.8	10/15/2007
October 2007	00610	Nitrogen, Ammonia	7D Qty	0.45	.67373	10/15/2007
October 2007	00610	Nitrogen, Ammonia	7D Conc	3.0	5.9	10/22/2007
October 2007	00610	Nitrogen, Ammonia	7D Qty	0.45	1.13891	10/22/2007
January 2008	00610	Nitrogen, Ammonia	7D Conc	4.5	5.2	1/22/2008
March 2008	00530	Total Suspended Solids	7D Qty	3.5	5.1476	3/1/2008
June 2008	00610	Nitrogen, Ammonia	30D Conc	2.0	2.64	6/1/2008
June 2008	00610	Nitrogen, Ammonia	7D Conc	3.0	7.04	6/1/2008
July 2008	00300	Dissolved Oxygen	1D Conc	6.0	4.9	7/7/2008
July 2008	00300	Dissolved Oxygen	1D Conc	6.0	4.9	7/22/2008
January 2009	00610	Nitrogen, Ammonia	30D Conc	3.0	3.935	1/1/2009
January 2009	00610	Nitrogen, Ammonia	7D Conc	4.5	7.68	1/15/2009
April 2009	00610	Nitrogen, Ammonia	30D Qty	0.45	.50524	4/1/2009
April 2009	00610	Nitrogen, Ammonia	7D Qty	0.68	.88183	4/15/2009
June 2009	50060	Chlorine, Total Residu	1D Conc	0.019	.06	6/19/2009
October 2009	00610	Nitrogen, Ammonia	30D Conc	2.0	4.84	10/1/2009
October 2009	00610	Nitrogen, Ammonia	7D Conc	3.0	13.3	10/1/2009
October 2009	00610	Nitrogen, Ammonia	7D Qty	0.45	.55375	10/1/2009
October 2009	00610	Nitrogen, Ammonia	7D Conc	3.0	4.09	10/22/2009
January 2010	00610	Nitrogen, Ammonia	30D Conc	3.0	5.93333	1/1/2010
January 2010	00610	Nitrogen, Ammonia	7D Conc	4.5	14.4	1/8/2010
February 2010	00610	Nitrogen, Ammonia	7D Conc	4.5	8.38	2/1/2010
June 2010	31616	Fecal Coliform	7D Conc	2000	3300	6/1/2010
May 2011	00530	Total Suspended Solids	7D Qty	2.7	3.20211	5/22/2011

**Attachment C**

Fairfield County Board of Commissioners - Lakeside Estates (Ohio EPA No.: 4PG00028)  
Compliance Schedule Violations

<b>Permit No</b>	<b>Permit Effective Date</b>	<b>Permit Expiration Date</b>	<b>Schedule Due Date</b>	<b>Completion Date</b>	<b>Event Code</b>	<b>Schedule Type</b>	<b>Schedule Milestone</b>
4PG00028*GD	8/1/2007	7/31/2012	3/1/2008	Not Completed	1799	Construction	Complete Plans & Specs
4PG00028*GD	8/1/2007	7/31/2012	9/1/2008	Not Completed	3099	Construction	Begin Construction
4PG00028*GD	8/1/2007	7/31/2012	8/1/2009	Not Completed	4599	Construction	End Construction
4PG00028*GD	8/1/2007	7/31/2012	2/1/2010	Not Completed	5599	Construction	Operational Level Attained

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June 2, 2009

The Honorable Mitch O'Brien  
Mayor  
City of Pickerington  
100 Lockville Road  
Pickerington, OH 43147

Dear Mayor O'Brien:

Enclosed is a report regarding a Compliance Evaluation Inspection that Jacob Howdyshell and I of the Ohio EPA performed at the City of Pickerington Wastewater Treatment Plant (WWTP). Mr. Howdyshell visited the WWTP on April 24, 2009, in response to concerns about odors and I visited the WWTP on May 19, 2009, to view the plant upgrade. Please read the report carefully since there are several items which require attention. The major items are listed as follows:

- At this time, the Pickerington WWTP is in violation of the State of Ohio Sewage Sludge Rules contained in Chapter 3745-40 of the Ohio Administrative Code. Specific problems are included in Item H in this inspection report. Written information must be submitted to Ohio EPA by June 22, 2009, that details how the referenced problems will be addressed.
- Item three (3) in the wastewater discharge permit requires written verification of work completion within 14 days of its completion. There has been no written notification from the City that work has been completed to comply with interim Total Dissolved Solids effluent limitations. Please advise this office in writing by June 22, 2009, regarding status of this work.

It was good to see progress has occurred thus far with expansion of the city's WWTP. The wastewater discharge permit indicates that the WWTP will be operational and meeting final effluent limitations by February 1, 2010.

The Honorable Mitch O'Brien  
Mayor  
City of Pickerington  
Page -2-

If there are questions regarding sludge management please contact Jacob Howdysshell by telephone at (614) 644-2018 or by e-mail at [jacob.howdysshell@epa.state.oh.us](mailto:jacob.howdysshell@epa.state.oh.us). For other questions you may contact Jan Rice by telephone at 614-728-3850 or by e-mail at [jan.rice@epa.state.oh.us](mailto:jan.rice@epa.state.oh.us).

Sincerely yours,

Jan A. Rice  
Environmental Specialist  
Field Operations Unit  
Division of Surface Water  
Ohio EPA/CDO

Jacob Howdysshell  
Environmental Specialist  
Biosolids Unit  
Division of Surface Water  
Ohio EPA/CO

JAR/JH/nsm Pickerington 5-19-09 CEIS cover letter

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

<b>Permit No.</b> 4PB00017	<b>NPDES No.</b> OH0031119	<b>Date</b> 5/19/09	<b>Inspection Type</b> C	<b>Inspector</b> S	<b>Facility Type</b> 1
-------------------------------	-------------------------------	------------------------	-----------------------------	-----------------------	---------------------------

**B. FACILITY DATA**

<b>Name and Location of Facility Inspected</b>	<b>Entry Time</b>	<b>Permit Effective Date</b>
City of Pickerington Wastewater Treatment Plant (WWTP) 525 South Hill Road Pickerington, Ohio 43147	9:00 A.M.	1/1/08
	<b>Exit Time</b>	<b>Permit Expiration Date</b>
	11:00 A.M.	12/31/12
<b>Name(s) and Title(s) of On-Site Representative(s)</b>	<b>Phone Number(s)</b>	
Kent Sanderson, Chief Operator	614-837-6470	
<b>Name(s), Address and Title(s) of Operator of Record</b>	<b>Phone Number(s)</b>	
<b>Name, Address and Title of Responsible Official</b>	<b>Phone Number</b>	
Mitch O'Brien, 100 Lockville Road, Pickerington, Ohio 43147 Mayor	614-837-3974	

**C. AREAS EVALUATED DURING INSPECTION** (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit
S/S	Records/Reports
M/S	Operations & Maintenance – sludge management needs improvement to minimize odors.
S	Facility Site Review
N	Collection System
S	Flow Measurement
S	Laboratory
M/M	Effluent/Receiving Waters – infrequent effluent limitations violations. No sludge deposits noted in stream. The Walnut Creek Technical Support Document indicates Sycamore Creek is impacted by total dissolved solids discharge from this WWTP.
U/S	Sludge Storage/Disposal – sludge storage time reported as now being approximately 70 days with no contracted storage alternative arrangements currently in place. Alternative storage arrangements must immediately be developed.
N	Pretreatment
M	Compliance Schedules – the permittee needs to review the permit compliance schedule to ensure that required information is submitted on time.
S	Self-Monitoring Program

**D. SUMMARY OF FINDINGS/COMMENTS:** This WWTP is currently undergoing an expansion which is scheduled to be completed by February 1, 2010. The expansion will help address several problems noted in this report but will not provide a means for providing consistent compliance with the total dissolved solids final effluent limitation. The permittee is continuing review of options necessary to comply with the total dissolved solids limitation contained in this wastewater discharge permit.

\_\_\_\_\_  
Jan Rice, Inspector, Ohio EPA, Central District Office

\_\_\_\_\_  
Date

\_\_\_\_\_  
Erin Sherer, Reviewer, Ohio EPA, Central District Office

\_\_\_\_\_  
Date

**E. PERMIT VERIFICATION**

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges	X			
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

**F. COMPLIANCE SCHEDULES/VIOLATIONS**

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	*X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in permit	X			
e. Permittee is meeting compliance schedule	*X			

**Comments:** \*a. effluent limitations violations are listed in Attachment "A" of this report.

\*e. Item 1a. - PTI due 2/1/08; submitted 2/19/08. Item 1b. - construction initiation due by 8/1/08; started 10/27/08. Item 2a. - TDS status report due 7/1/08; submitted 7/18/08. Item 2b. - compliance with interim TDS limit due by 1/1/09; no final effluent TDS violations as of 3/31/09 for permit effective 1/1/08. Item 3 requires written verification of work completion within 14 days of completion. There has been no written notification by the permittee of work completion to comply with interim TDS effluent limitations. The permittee must advise this office in writing by June 22, 2009 regarding status of work required in Item 2b.

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed <u>        </u>	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts: <u>1</u> Days/Week: <u>5 with weekend checks</u>	X			
e. Operator holds unexpired license of class required by permit Class: <u>III</u>	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		*X		
h. Operation and maintenance manual provided and maintained		*X		
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses <u>        </u> on MORS <u>        </u> 800 Number <u>        </u>			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

**Comments:** \*g. one of four influent pumps is out of service being repaired. \*h. an Operation and Maintenance Program Development Plan dated 9/22/08 has been prepared by Ohio EPA and the permittee to summarize activities that the permittee will undertake to operate and maintain its WWTP.

<b>Collection System</b> (overseen by the permittee street department)	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>N/E</b>
a. Percent combined system: 0%				
b. Any collection system overflows since last inspection (CSO ___ SSO ___)		X		
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system		X		
g. Lift station alarm systems provided and maintained (overseen by WWTP staff)	X			
h. Are lift stations equipped with permanent standby power or equivalent	X*			
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	*X			
j. Any complaints received since last inspection of basement flooding		X		
k. Are any portions of the sewer system at or near capacity		*X		

**Comments:** \*h. a trailer mounted generator is now connected to the D Line lift station. Another portable generator was recently purchased. A portable pump is available for use if necessary. The five lift stations in the collection system are monitored by a SCADA system.

\*i. service manager Ed Drobina indicated repairs have been made as necessary in the collection system in the old part of Pickerington.

\*k. service manager Ed Drobina indicated a sanitary sewer system master study planned for 2009 will include sewer system flow monitoring.

#### H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): \_\_\_\_\_ Submitted Date \_\_\_\_\_  
 \_\_\_\_\_ Approval Number \_\_\_\_\_  
 \_\_\_\_\_ Not submitted \_\_\_\_\_  
 \_\_\_\_\_ N/A \_\_\_\_\_

	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>N/E</b>
b. Sludge Management Plan current		X		
c. Sludge adequately disposed (Method: Land Application)	X			
d. If sludge is incinerated, where is ash disposed of?			X	
e. Is sludge disposal contracted (Name: Synagro)	X			
f. Has amount of sludge generated changed significantly since last inspection				X
g. Adequate sludge storage provided at plant		*X		
h. Land application sites monitored and inspected per SMP	X			
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge	*X			
k. Is sludge adequately processed (digestion, dewatering, pathogen control)		*X		

**Comments:** \*g., j. and k. On April 24, 2009, Ohio EPA representative Jacob Howdysell conducted an inspection at this WWTP. The purpose of the inspection was to determine compliance with the Ohio Sewage Sludge Rules, Chapter 3745-40 of the Ohio Administrative Code (OAC). Mr. Rick Barnes, Utilities Operator, and Mr. Harold Brown, Technical Services Manager, were present and provided information on sludge operations and record keeping. The inspection included a walkthrough of the plant, a review of sewage sludge records, and completion of the enclosed checklist.

The current method of sludge treatment is to send secondary sludge to a series of two aerated digesters, with a capacity

of approximately 240,000 gallons each. Sewage sludge is then removed from the aerated tanks and sent to the belt press on site. After pressing, the sludge is stored on one of three concrete storage pads, capacity of approximately 100 wet tons each, until it is removed for land application.

During the inspection, the following deficiencies were discovered in regards to sewage sludge management and record keeping:

- OAC 3745-40-05(T) states the following:

Facility storage of sewage sludge shall be provided by the permittee such that there shall be no adverse effects from sewage sludge handling at the permittee's treatment works. Facility storage of sewage sludge shall consist of one hundred twenty days sewage sludge storage for the design capacity of the treatment works. Facility storage of sewage sludge may consist of any combination of additional volume in sludge stabilization units (digesters), separate tanks, sewage sludge treatment lagoons, drying beds, dewatered sewage sludge storage pad areas, or other means to store either liquid or dewatered sewage sludge. In lieu of some of the one hundred twenty day facility storage of sewage sludge requirement, a permittee may demonstrate to the director that they have engineered or contracted alternatives to facility storage of sewage sludge in place. Alternatives to facility storage of sewage sludge include, but are not limited to, the following:

- (1) Contracts in effect with a sanitary landfill and sufficient transportation to dispose of sewage sludge that cannot be otherwise managed through facility storage of sewage sludge or other means of use or disposal;
- (2) Contracts in effect with another permitted facility and sufficient transportation to transfer sewage sludge that cannot be otherwise managed through facility storage of sewage sludge or other means of use or disposal; or
- (3) Ownership or leasing of, or contracts in effect with, a regional storage of sewage sludge facility and sufficient transportation to transfer sewage sludge that cannot be otherwise managed through facility storage of sewage sludge or other means of use or disposal.

**At the time of my inspection, Mr. Barnes stated that the current storage capacity for sewage sludge at the treatment works is approximately 70 days and that there are no contracted alternatives to storage at the Pickerington WWTP at this time. The permittee shall immediately seek out a contracted alternative to facility storage of sewage sludge to come into compliance with this rule until construction at the treatment plant is complete and facility storage has been increased to the required amount.**

- OAC 3745-40-05(M) states the following:

"One of the vector attraction reduction requirements in paragraphs (Q)(1) to (Q)(10) of this rule shall be met when sewage sludge is applied to the land."

**At the time of my inspection, the treatment plant was claiming to be meeting vector attraction reduction by meeting the requirements for a specific oxygen uptake rate (SOUR) test. Although dissolved oxygen monitoring sheets were available, there were no calculations done to show that SOUR had indeed met the regulations. The treatment plant shall immediately start performing all of the necessary requirements to meet the SOUR test, or shall perform another vector attraction reduction alternative to meet the requirements of this rule. I have included an example of a bench sheet (see Attachment "B") that may be used for the SOUR test in the future. The example sheet includes the required calculations to determine the actual SOUR of the sewage sludge.**

- OAC 3745-40-06(I) requires that the permittee who provides treatment to bulk sewage sludge develop and sign the following certification statements:

"I certify, under penalty of law, that the information that will be used to determine compliance with class (insert A or B) pathogen reduction alternative (insert one of the class A alternatives in paragraphs (N)(1) to (N)(6) of rule 3745-40-05 of the Administrative Code or one of the class B alternatives in paragraphs (O)(1) to (O)(3) of rule 3745-40-05 of the Administrative Code) was prepared under my direction and supervision in accordance

with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

and

"I certify, under penalty of law, that the information that will be used to determine compliance with vector attraction reduction requirement (insert one of the vector attraction reduction requirements in paragraphs (Q)(1) to (Q)(8) of rule 3745-40-05 of the Administrative Code) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

**The WWTP shall develop these certification statements and sign them in accordance with paragraph 3745-31-04 of the Ohio Administrative Code (according to that paragraph the superintendent of the WWTP shall sign the statements). These statements shall be developed and signed at the end of each reporting period to verify the pathogen and vector attraction reduction for that reporting period. The statements must be kept for 5 years and copies of the statements shall be submitted yearly with the annual sewage sludge use/disposal report.**

- OAC 3745-40-06(I) requires that the permittee who provides treatment to bulk sewage sludge develop a description of how the pathogen reduction requirements of rule 3745-40-05 of the Administrative Code are met and a description of how the vector attraction reduction requirements of rule 3745-40-05 of the Administrative Code are met, and keep these descriptions for a minimum of five years and make them available to the Ohio EPA upon request.

**At the time of the inspection, these descriptions were not available. The WWTP shall develop these descriptions to keep on file at the treatment plant.**

One reason for Ohio EPA's inspection has been the gradual increase in odors generated by the Pickerington WWTP sewage sludge over the last year. At this time, it is believed that the odors are being generated by a lack of detention time in the digesters. Observing three different stockpiles of sludge on the storage pads, it appears that the sludge is continuing to digest on the pads, which may be generating the odors. Ohio EPA suggests treating sludge by operating the two digesters in series and actively decanting to thicken the sludge as much as possible, increasing the detention time in the digesters. At the time of my inspection, it appeared that the digesters were being utilized in a parallel manner, as sludge in both of the digesters was at the same level and appeared to be of the same consistency.

**At this time, the Pickerington WWTP is in violation of Chapter 3745-40 of the Ohio Administrative Code. By June 22, 2009, information must be submitted to Ohio EPA that details how the above deficiencies will be addressed.**

Pages 6 through 17 of this report provide an additional sewage sludge land application checklist used during this inspection.



**SEWAGE SLUDGE LAND APPLICATION  
INSPECTION**

Date of Inspection: 4/24/04

Inspector Name: JACOB HOWDYSHILL

Facility Name PICKERINGTON

Facility Address: 525 Hill Rds
City: PICKERINGTON
Zip:

Mailing Address: 100 LOGICVILLE RD.
City: PICKERINGTON
Zip: 43147

**Contacts Present**

Name: RICK BARNES
Title: UTILITIES OPERATOR
Phone: (614) 837-6470
Fax:

Name: HAROLD BROWN
Title: TECH. SERVICES MANAGER
Phone:
Fax:

**I. Facility Information**

**Facility Background**

Average Daily Flow (MGD)	1.3
Sewage Sludge Class	EQ <u>B</u> Unknown
Sewage Sludge Storage Capacity (Days)	70
Contracted Alternative (if applicable)	NOT YET

**Facility Sewage Sludge Treatment Process(es)**

Treatment Process	# Units	Notes
AEROBIC DIGESTERS	2	470,000 GALLONS TOTAL
BELT PRESS	1	
<u>B</u> STORAGE PADS	3	~100 WET TON EACH

## II. Management Practices

### General Facility Sewage Sludge Treatment

<input checked="" type="radio"/> Yes	No	N/A	1. Are the sewage sludge treatment units being operated/maintained in accordance with the manufacturer's specifications?
<input checked="" type="radio"/> Yes	No	N/A	2. Does the facility have adequate equipment redundancy (ie. back-up sewage sludge treatment units)?
<input checked="" type="radio"/> Yes	No	N/A	3. Does the facility have any plans for upgrades to any of the sewage sludge treatment units?  If so, explain: <u>2 NEW DIGESTERS</u>
Yes	<input checked="" type="radio"/> No	N/A	4. Does the facility have a contingency plan for sewage sludge disposal?
Yes	<input checked="" type="radio"/> No	N/A	5. Is the sewage sludge handling operation adequate to manage the volume of sewage sludge generated?
<b>Comments:</b>			<u>- WILL BE WORKING ON CONTINGENCY PLAN</u>

### Drying Beds, Gravity Thickener, Centrifuge, and Dissolved Air Floatation

~~N/A~~

Average percent (%) solids before thickening:		Average percent (%) solids before thickening:	
---	--	---	--

Yes	No	N/A	1. Is primary unstabilized sewage sludge fed to the drying beds, gravity thickener, or centrifuge?
Yes	No	N/A	2. Is the sewage sludge mixed with other materials, including coagulants, before or after thickening?

Average percent (%) solids before mixing sewage sludge with other materials:	
--	--

Comments:	
-----------	--

**Aerobic Digestion**

N/A

	1. Sewage sludge fed to the aerobic digester includes: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> Secondary <input type="checkbox"/> Combined
Yes No <input checked="" type="radio"/> N/A	2. Aerobic digester is operated at proper temperature? <input type="checkbox"/> Cryophilic (<10° C = <50° F) <input type="checkbox"/> Mesophilic (10° to 42° C = 50° to 108° F) <input type="checkbox"/> Thermophilic (>42° C = >108° F)
Comments:	~ 25-30 DAYS DETENTION TIME

**Anaerobic Digestion**

N/A

	1. Sewage sludge fed to the aerobic digester includes: <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Combined
	2. Anaerobic digester operating mode: <input checked="" type="checkbox"/> High Rate* <input type="checkbox"/> Low Rate <small>*Utilize a combination of active mixing and elevated temperatures.</small>
Yes No <input checked="" type="radio"/> N/A	3. Aerobic digester is operated at proper temperature? <input type="checkbox"/> Cryophilic (35° C = 95° F) <input type="checkbox"/> Thermophilic (55° C = 131° F)
Comments:	

**Composting**

N/A

	1. Type of sewage sludge composting performed: <input type="checkbox"/> In Vessel <input type="checkbox"/> Static Piles <input type="checkbox"/> Windrows
--	--

	2. Type of sewage sludge composted includes: <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Combined
Yes No N/A	3. Is the moisture content of the composting operation monitored?
Yes No N/A	4. Is the compost mixed? If so, number of turnings: <input type="text"/>
Yes No N/A	5. Is the oxygen content of the compost monitored?
Yes No N/A	6. Is the temperature of the compost monitored?
Yes No N/A	7. Are total and total volatile solids of the compost monitored?
Yes No N/A	8. Active Phase (days): <input type="text"/> Curing Phase (days): <input type="text"/>
<b>Comments:</b>	

**Land Application**

N/A

	1. Sewage sludge is applied to: <input checked="" type="checkbox"/> Authorized Sewage Sludge Site <input type="checkbox"/> Unauthorized Sewage Sludge Site <input type="checkbox"/> Forest <input type="checkbox"/> Reclamation Site <input type="checkbox"/> Lawn or Garden <input type="checkbox"/> Public Contact Site (ie. park, etc.)
--	--

Yes No N/A

2. Are Class A pathogen reduction requirements met (indicate method being performed)?

- Alt. 1 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and time/temperature:
  - >7% solids at >50° C (>122°F) for >20 minutes (no warmed gases or immiscible liquid).
  - >7% solids at >50° C (>122°F) for >15 seconds (warmed gases or immiscible liquid).
  - <7% solids at X° C for >15 seconds to <30 minutes.
  - <7% solids at >50° C (>122°F) for >30 minutes.
  
- Alt. 2 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and pH > 12 for 72 hours.
  
- Alt. 3 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and other processes:
  - Enteric virus is <1 plaque forming unit (PFU) per 4 grams of total solids (TS) PRIOR to pathogen treatment (PT).
  - Enteric virus is >1 PFU per 4 grams of TS prior to PT but is <1 per 4 grams of TS AFTER PT.
  - Helminth ova is <1 per 4 grams of TS PRIOR to PT.
  - Enteric virus >1 PFU per 4 grams of TS prior to PT, but is <1 per 4 grams of TS AFTER PT.
  
- Alt. 4 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and unknown processes:
  - Enteric virus is <1 PFU per 4 grams of TS at disposal.
  - Helminth ova is <1 per 4 grams of TS at disposal.
  
- Alt. 5 - Fecal Coliform <1,000 MPN/g total solids, or Salmonella <3 MPN/4 g total solids, and PFRP:
  - 1. Composting.
  - 2. Heat drying.
  - 3. Heat treatment.
  - 4. Thermophilic aerobic digestion.
  - 5. Beta ray irradiation.
  - 6. Gamma ray irradiation.
  - 7. Pasteurization.
  
- Alt. 6 - Equivalent process.

Yes No N/A

3. Are Class B pathogen reduction requirements met (indicate method being performed)?

Alt. 1 -Geometric mean of seven Fecal Coliform samples with <2,000,000 MPN/g total dry solids or <2,000,000 Colony Forming Units/g total dry solids.

Alt. 2 - PSRP 1 aerobic digestion. Mean cell residence time and temperature shall be between 40 days at 20°C (68°F) and 60 days at 15°C (59°F).

Average mean cell residence time (days):

Average temperature (°C) :

PSRP 2 air drying. Sewage sludge dried on sand beds or basins for 3 months at an ambient average daily temperature >0°C (>32°F)

PSRP 3 anaerobic digestion. Mean cell residence time and temperature shall be between 15 days at 35°-55°C (95°-131°F) and 60 days at 20°C (68°F).

Average mean cell residence time (days):

Average temperature (°C) :

PSRP 4 composting. Sewage sludge temperature is raised to >40°C (>104°F) for 5 days. Temperature must exceed 55°C (>131°F) for 4 hours during the 5 day period.

PSRP 5 lime treatment. Lime is added to sewage sludge to raise the pH to 12 after 2 hours of contact.

Yes No N/A

4. Are the Class B signage requirements being satisfied?

Yes	No	N/A	
			<p>5. Are Class B site restrictions being practiced (indicate restrictions being performed)?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Food crops (above ground) are harvested &gt;14 months after sewage sludge application.</li> <li><input type="checkbox"/> Food crops (below ground) are harvested &gt;20 months after sewage sludge application when sewage sludge remains on ground &gt;4 months before soil incorporation.</li> <li><input type="checkbox"/> Food crops (below ground) are harvested &gt;38 months after sewage sludge application when sewage sludge remains on ground &lt;4 months before soil incorporation.</li> <li><input checked="" type="checkbox"/> Food crops, feed crops, and fiber crops are harvested &gt;30 days after sewage sludge application.</li> <li><input checked="" type="checkbox"/> Animal grazing allowed on land only &gt;30 days after sewage sludge application.</li> <li><input type="checkbox"/> Turf grown on land where sewage sludge was applied not harvested for &gt;1 year if placed on land with high potential for public exposure or lawn.</li> <li><input type="checkbox"/> Public access restricted to land with a high potential for public exposure for 1 year.</li> <li><input checked="" type="checkbox"/> Public access restricted to land with a low potential for public exposure for 30 days.</li> </ul>

<p>Yes No N/A</p>	<p>6. Are bulk sewage sludge site restrictions being practiced (indicate restrictions being performed)?</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> No threatened or endangered species present or critical habitat affected at the site where sewage sludge is applied.</li> <li><input checked="" type="checkbox"/> Bulk sewage sludge is not applied to frozen or snow covered ground unless applied &gt;100 feet from waters of the state and appropriate ground cover maintained.</li> <li><input checked="" type="checkbox"/> Bulk sewage sludge is not applied &lt;33 feet from waters of the state.</li> <li><input checked="" type="checkbox"/> Bulk sewage sludge is applied at a rate equal or less than the agronomic rate.</li> <li><input checked="" type="checkbox"/> Label affixed no bag or information sheet provided to user of sold and given away sludge indicating name of sludge preparer, application instruction, and maximum annual whole sludge application rate.</li> </ul>
<p>Yes No N/A</p>	<p>7. Are bulk sewage sludge general requirements being practiced (indicate restrictions being performed)?</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Sewage sludge is not applied to a site where the cumulative pollutant loading or annual application rate has been reached..</li> <li><input checked="" type="checkbox"/> Notification given to the sludge applier regarding total nitrogen content of the sludge.</li> <li><input checked="" type="checkbox"/> Sufficient information required to comply with OAC 3745-40.</li> <li><input checked="" type="checkbox"/> Sewage sludge site authorization packet submitted to Ohio EPA regarding the location of land application sites, appropriate NPDES permit numbers.</li> </ul>

<p>Yes No N/A</p>	<p>7. Is a vector attraction reduction method being met (indicate method being performed)?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 38% Volatile Solids Reduction.</li> <li>VS Red. = ( VS In - VS Out ) / (( VS In ) - ( VS, In x VS, Out )) x 100%</li> <li><input type="checkbox"/> 40-day bench scale test. Volatile Solids reduced &lt;17% (anaerobic digestion only)</li> <li><input type="checkbox"/> 30-day test bench scale . Volatile Solids reduced &lt;15% (aerobic digestion only)</li> <li><input checked="" type="checkbox"/> Specific Oxygen Uptake Rate &lt;1.5 mg/hr/gm Total Solids at 20°C (68°F).</li> <li><input type="checkbox"/> Aerobic process for &gt;14 days at &gt;40°C (104°F) with average sewage sludge temperatures at 45°C (113°F).</li> <li><input type="checkbox"/> pH &gt;12 for 2 hours and pH &gt;11.5 for 22 hours.</li> <li><input type="checkbox"/> Sewage sludge with no unstabilized solids contains &gt;75% Total Solids prior to mixing with other materials.</li> <li><input type="checkbox"/> Sewage sludge with unstabilized solids contains &gt;90% Total Solids prior to mixing with other materials.</li> <li><input type="checkbox"/> Subsurface injection.</li> <li><input type="checkbox"/> Soil incorporation within 6 hours for Class B or within 8 hours for EQ.</li> </ul>
<p>Comments:</p>	<p>BENCH SHEETS AVAILABLE , BUT NO FINAL SOUR #.</p>

**Other Management Practices**

~~N/A~~

	<p>1. The facility performs another sewage sludge treatment process (indicate which other management practice is being performed)</p> <p><input type="checkbox"/> Surface Disposal.</p> <p><input type="checkbox"/> Landfilling.</p> <p><input type="checkbox"/> PPG Lime Lakes.</p>
<p><b>Comments:</b></p>	

**III. NPDES Permit Verification**

<p><input checked="" type="radio"/> Yes   No   N/A</p>	<p>1. Are OAC 3745-40 sewage sludge frequency and monitoring parameters contained in the facility's current NPDES permit?</p>
	<p>2. Sewage sludge disposal practice(s):</p> <p>A. Land Application <input checked="" type="checkbox"/></p> <p>    Bulk Sewage Sludge <input type="checkbox"/></p> <p>    Bulk Material Derived from Sewage Sludge Sold or Given Away in Bag or Other Container <input type="checkbox"/></p> <p>B. Surface Disposal <input type="checkbox"/></p> <p>C. Sewage Sludge Incineration <input type="checkbox"/></p> <p>D. Onsite or Offsite Disposal <input type="checkbox"/></p> <p>E. Other:</p>
<p><input checked="" type="radio"/> Yes   No   N/A</p>	<p>3. Is the sewage sludge disposal practice authorized by current NPDES permit?</p>
<p><input checked="" type="radio"/> Yes   No   N/A</p>	<p>4. If the authorized sewage sludge disposal practice changes, will notification be given to Ohio EPA prior to the change?</p>
<p><input checked="" type="radio"/> Yes   No   N/A</p>	<p>5. The facility is utilizing sewage sludge land application sites that have been previously authorized by Ohio EPA.</p>
<p><b>Comments:</b></p>	

**Monitoring and Reporting**

MORE

Yes <input checked="" type="radio"/> No <input type="radio"/> N/A	1. Is facility self-monitoring occurring at the frequencies specified for the parameters located in the facility's NPDES permit or OAC 3745-40?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	2. Is the facility reporting parameters using Ohio EPA form 4500?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	3. Is facility self-monitoring data available for all regulated pollutants for the previous five years?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	4. Do monthly operating reports show pollutant concentrations below ceiling concentrations shown in OAC 3745-40-05(F)(1)?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	5. Do monthly operating reports show pollutant concentrations below monthly average concentrations shown in OAC 3745-40-05(F)(3)?
Yes <input type="radio"/> No <input type="radio"/> <input checked="" type="radio"/> N/A	6. Are general requirements and management practices applied for sewage sludge not meeting monthly average concentrations shown in OAC 3745-40-05(F)(3)?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	7. Are sewage sludge records adequate to assess compliance with annual and/or cumulative pollutant loading rates?
Yes <input type="radio"/> <input checked="" type="radio"/> No <input type="radio"/> N/A	8. Are pathogen and vector attraction reduction method descriptions and certification statements available for the previous five years?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	9. Are records available for all sewage sludge use or disposal practices available for the previous five years?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	10. Have the facility's sewage sludge sites been tested for pH and Phosphorus within two years of land application?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	11. Are accurate records of sewage sludge volume or mass maintained for the previous five years?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	12. Are monitoring and analysis being performed more frequently than required by the facility's NPDES permit?
Yes <input type="radio"/> <input checked="" type="radio"/> No <input type="radio"/> N/A	If so, are the results being reported to Ohio EPA?
Yes <input type="radio"/> <input checked="" type="radio"/> No <input type="radio"/> N/A	13. Do sewage sludge treatment unit operation records verify compliance with pathogen reduction and vector attraction reduction requirements, when appropriate?
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	14. Are sewage sludge samples taken at the locations specified in the facility's NPDES permit?

WILL DEVELOP

SYNAGRO PULLING AS WELL

FINAL CALC FOR SOUR

<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	15. Are sewage sludge sample locations and methods appropriate for obtaining representative samples?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	16. Sample collection procedures:
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	A. Adequate sample volumes obtained?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	B. Proper preservation techniques utilized?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	C. Containers conform to appropriate analytical methods specified in OAC 3745-40?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	D. Samples analyzed within the appropriate time frames specified in OAC 3745-40?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	17. Are analytic results reported on a dry weight basis (mg/kg)?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	18. Are samples refrigerated subsequent to compositing?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	19. Are chain-of-custody procedures employed?
<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A	20. Are the analytic methods used approved in OAC 3745-40?
<b>Comments:</b>			

- STORAGE
- FINAL NUMBERS SOUR
- DEVELOP SOP'S & CERTS.
- CONTINGENCY



**J. EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
1	None	None	None	Slight	None	Clear	

**K. MULTIMEDIA OBSERVATIONS**

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

City of Pickerington WWTP  
 Effluent Limitations Violations  
 5/1/07 – 3/31/09  
 Outfall Monitoring Station 4PB00017001

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PB00017*KD	May 2007	001	00515	Residue, Total Dissolv	30D Conc	1710	1933.33	5/1/2007
4PB00017*KD	June 2007	001	00515	Residue, Total Dissolv	30D Conc	1710	2380.58	6/1/2007
4PB00017*KD	July 2007	001	00515	Residue, Total Dissolv	30D Conc	1710	2177.83	7/1/2007
4PB00017*KD	August 2007	001	00515	Residue, Total Dissolv	30D Conc	1710	1799.25	8/1/2007
4PB00017*KD	September 2007	001	00515	Residue, Total Dissolv	30D Conc	1710	1929.08	9/1/2007
4PB00017*KD	October 2007	001	00515	Residue, Total Dissolv	30D Conc	1710	1732.5	10/1/2007
4PB00017*LD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.4	2.5	9/1/2008
4PB00017*LD	September 2008	001	00610	Nitrogen, Ammonia (NH3	7D Qty	8.5	10.4479	9/1/2008
4PB00017*LD	January 2009	001	00530	Total Suspended Solids	30D Conc	6.0	6.03077	1/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	30D Conc	6.0	20.3333	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Conc	9.0	52.7333	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	30D Qty	36.3	111.817	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Qty	54.6	224.598	2/1/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Conc	9.0	22.3333	2/8/2009
4PB00017*LD	February 2009	001	00530	Total Suspended Solids	7D Qty	54.6	193.787	2/8/2009

**SPECIFIC OXYGEN UPTAKE RATE DATA SHEET, SLUDGE FOR LAND APPLICATION**

DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ LOCATION: \_\_\_\_\_

**S**PECIFIC  
**O**XYGEN  
**U**PTAKE  
**R**ATE

MINUTES	TEMPERATURE Celsius	DISSOLVED OXYGEN mg/L
0		
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
OXYGEN CONSUMPTION (mg/L) = _____ /15 =		
OXYGEN CONSUMPTION RATE (mg/L)/(minue) = _____		

**SLUDGE DATA - TOTAL SOLIDS (TS)**

SAMPLE VOLUME (mL) = \_\_\_\_\_  
 A = WEIGHT OF DISH + DRIED RESIDUE (mg) = \_\_\_\_\_  
 B = WEIGHT OF DISH (mg) = \_\_\_\_\_  
 C = WEIGHT OF DRIED RESIDUE (mg) = \_\_\_\_\_  
 mg/L TS = (C x 1000) / (SAMPLE VOLUME, mL) = \_\_\_\_\_

**SOUR CALCULATION**

SOUR (mg/g)/h =  $\frac{\text{Oxygen Consumption Rate (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{\text{TS (mg/L)}} \times \frac{\text{diluted volume}}{\text{original volume}}$

**TEMPERATURE CORRECTION**

SOUR@20C = SOUR x O<sup>(20-T)</sup> WHERE T=ACTUAL TEMP OF SLUDGE, OVER 20C Q=1.05, UNDER 20C Q=1.07

SOUR (mg/g)/hour = \_\_\_\_\_

OEPA REQUIRES SOUR ≤ 1.5 (mg/g)/hour

**Specific Oxygen Uptake Rate (SOUR)****Reference:****Standard Methods; 2710 A, 2710 B****Scope and Application**

The Specific Oxygen Uptake Rate (SOUR), also known as the oxygen consumption or respiration rate, is defined as the milligram of oxygen consumed per gram of volatile suspended solids (VSS) per hour. This quick test has many advantages; rapid measure of influent organic load and biodegradability, indication of the presence of toxic or inhibitory wastes, degree of stability and condition of a sample, and calculation of oxygen demand rates at various points in the aeration basin.

This test was originally developed as a plant control parameter. SOUR is now also used as an alternative test method to meet the vector attraction reduction requirement imposed by 40 CFR Part 503 standards for the use or disposal of sewage sludge. This requirement reduces the potential of spreading infectious disease agents by vectors (e.g. insects, rodents, and birds). SOUR - 503 is defined as milligram of oxygen consumed per gram of total solids (TS) per hour.

**Apparatus**

- Oxygen consumption rate device, either:
- Probe with an oxygen-sensitive electrode and meter OR
- Manometric or respirometric device with appropriate readout and sample capacity of at least 300 mL. The device should have an oxygen supply capacity greater than the oxygen-consumption rate of the sample to be measured, or at least 150 mg/L-h.
- Stopwatch or other suitable timing device.
- Thermometer to read to  $\pm 0.5^\circ$  C.
- Aeration device such as an aquarium pump (503 testing).
- 300 mL BOD bottle
- Magnetic stirplate and stirbar.

**Reagents**

The same reagents used to perform the Dissolved Oxygen test may be needed to calibrate the oxygen monitoring apparatus.

**Storage / Preservation**

The samples collected for SOUR testing should be analyzed as soon as possible. Realizing that the test will probably not be performed in the field and that some time will be required to transport the sample to the laboratory, delays will cause the value obtained to be lower than the actual value. If conditions cause the testing to be delayed, it may be better to obtain a new sample that can be analyzed without delay.

**Raw Data Sheet Format**

The following must be recorded on the data sheet:

- Sample identification (source, name, and date of collection)
- Analyst
- Raw data
- Final temperature corrected results with correct units

<http://www.ne-wca.org/LabManual/sour.htm>

5/19/2009

**Quality Control**

**When performing replicate determinations, keep analysis temperature constant for best precision**

**Procedure**

**Calibration of Oxygen Reading Apparatus**

1. **Calibrate the oxygen electrode and meter according to the manufacturer's calibration procedure. Generally, calibrate membrane electrodes using water saturated air or samples of known DO concentration (as determined by Winkler method).**

**OR**

2. **Calibrate the manometric or respirometric device according to manufacturer's instructions.**

**Preparation of the Sample**

• **Plant Parameter Testing**

**Collect enough sample to both fill a 300 ml BOD bottle and run a VSS test. Leave a minimum of one-inch headspace in the sample collection bottle. Shake sample to incorporate oxygen into the sample. Begin SOUR test immediately after collection of the sample.**

• **503 Testing**

**Quickly make a composite of several grab samples, collecting enough sample to both fill a 300 ml BOD bottle and run a TS test. Leave a minimum of one-inch headspace in the sample collection bottle. Shake sample to incorporate oxygen into the sample or bubble air or oxygen through sample. Begin SOUR test immediately after the collection of the sample.**

**Measure the SOUR of the sludge at the temperature at which the aerobic digestion is occurring in the treatment works. If a magnetic stirplate is used, it must not change the temperature of the sample during the test. Insulated stirplates are available. If this type is not on hand, insulate the stirplate top with a piece of Styrofoam or other insulating material.**

**Measurement of Oxygen Consumption Rate**

• **Plant Parameter and 503 Testing**

1. **Fill sample container to overflowing with a representative sample.**
2. **Begin monitoring of the dissolved oxygen.**
  - a. **If an oxygen sensing electrode is used, immediately insert it into the BOD bottle containing a magnetic stirring device and sample. Displace enough sample with the probe containing the electrode to fill the flared top of the BOD bottle in order to isolate its contents from the atmosphere. Stir sample. Adequate mixing is essential!**
  - b. **If a manometric or respirometric device is used, follow the manufacturer's instructions for startup.**
3. **After the meter reading has stabilized, record initial DO or manometric or respirometric reading, and start timing device. Record appropriate DO, manometric or respirometric data at least once per minute, depending on rate of consumption.**

<http://www.ne-wea.org/LabManual/sour.htm>

5/19/2009

4. Record data over a 15 minute period or until DO levels drop below 1 mg/L, whichever occurs first. (The oxygen electrode may not be accurate at DO levels below 1 mg/L.)
5. Low DO (<2.00 mg/L at the start of the test) may limit oxygen uptake by the sample. This phenomenon will be indicated by a decreasing rate of oxygen consumption as the test progresses. Reject such data as being unrepresentative of oxygen-consumption rate and repeat the test beginning with a sample having a higher initial DO level.

#### Calculations

If an oxygen electrode is used, plot observed readings (mg/L DO) versus time (minutes) on graph paper and determine the slope of the line of best fit. The slope is the oxygen consumption rate in milligrams per liter per minute.

If a manometric or respirometric device is used, refer to manufacturer's instructions for calculating the oxygen consumption rate.

Calculate specific oxygen rate in milligrams per liter per gram per hour as follows:

#### Parameter Testing

$$\text{SOUR (mg/g)/h} = \frac{\text{oxygen consumption rate (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{\text{VSS mg/L}}$$

#### • Example

A sample is collected for parameter testing at a treatment plant. The oxygen level of the sample is monitored at 30-second intervals. After 10 minutes, the dissolved oxygen level was below 1.00 mg/L. The oxygen depletion of each reading averaged 0.40 mg/L. The volatile suspended solids was analyzed and reported as 3500 mg/L. What is the SOUR?

First, note that the dissolved oxygen level was recorded every 30 seconds, therefore the average needs to be multiplied by 2 to get the oxygen consumption rate in the proper units.

$$\text{SOUR (mg/g)/h} = \frac{\text{oxygen consumption rate (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{\text{VSS mg/L}}$$

$$\text{SOUR (mg/g)/h} = \frac{0.80 \text{ (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{3500 \text{ VSS mg/L}}$$

$$\text{SOUR (mg/g)/h} = 13.71 \text{ or } 14$$

The most useful SOUR values will be determined by individual treatment plants for their own use, however, the following may be a helpful guideline:

>20    High    This may indicate that there are not enough solids for the

**BOD loading.**

- 12 - 20 Normal** This range will usually produce a good BOD removal and a sludge that settles well in the final clarifier.
- <12 Low** This may indicate that there are too many solids or there has been a toxic occurrence.

**503 Testing**

$$\text{SOUR (mg/g)/h} = \frac{\text{oxygen consumption rate (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{\text{TS mg/L}} \times \frac{\text{diluted volume}}{\text{original volume}}$$

Notice that total solids are used rather than volatile solids. This is consistent with the 503 regulations. The rationale for this is because all the sludge solids may degrade and exert an oxygen demand, not just the volatile portion.

It may be necessary to make dilutions of the sample in order to get a linear slope for the oxygen consumption rate. Use distilled water to make any necessary dilutions to ensure that no organic material is added in the dilution process. Use the undiluted sample to determine total solids and back calculate to correct if a dilution was used for oxygen consumption testing.

• **Example**

A sample is collected for 503 testing at a treatment facility. The sample is collected from an anaerobic digester. Due to the low oxygen levels, 500 mL of the sample is diluted to 1 L using distilled water. The oxygen level of the sample is monitored at 15-second intervals. After 14 minutes, the dissolved oxygen level was below 1.00 mg/L. The oxygen depletion of each reading averaged 0.12 mg/L. The total solids was analyzed and reported as 4.8 %. What is the SOUR?

$$\text{SOUR (mg/g)/h} = \frac{\text{oxygen consumption rate (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{\text{TS mg/L}} \times \frac{\text{diluted volume}}{\text{original volume}}$$

$$\text{SOUR (mg/g)/h} = \frac{0.48 \text{ (mg/L)}}{\text{minute}} \times \frac{60 \text{ minutes}}{\text{hour}} \times \frac{1000 \text{ mg/g}}{48000 \text{ mg/L}} \times \frac{1000 \text{ mL}}{500 \text{ mL}}$$

$$\text{SOUR (mg/g)/h} = 1.2$$

**Temperature Correction**

In order to meet the SOUR criteria for 40 CFR 503, the SOUR must be less than or equal to

<http://www.ne-wea.org/LabManual/sour.htm>

5/19/2009

**1.5 (mg/g)/hour of total solids (dry weight) at 20° C. This level is used to discriminate between adequately stabilized and poorly stabilized sludge.**

**The SOUR of the sludge must be measured at the temperature at which the aerobic digestion is occurring and corrected to 20° C by the following equation:**

$$\text{SOUR}_{20} = \text{SOUR}_T \times Q^{(20-T)}$$

Where Q is a temperature dependent variable:

$$Q = 1.05 \text{ above } 20^\circ \text{ C}$$

$$Q = 1.07 \text{ below } 20^\circ \text{ C}$$

**This correction may be applied only if the temperature of the sludge is between 10° C and 30° C**

• **Example**

**If the digested sludge used in the above example was**

14° C, then :

$$\text{SOUR}_{20} = 1.2 \times 1.07^{(20-14)}$$

$$\text{SOUR}_{20} = 1.2 \times 1.07^{(6)}$$

$$\text{SOUR}_{20} = 1.2 \times 1.50$$

$$\text{SOUR}_{20} = 1.8$$

23° C, then :

$$\text{SOUR}_{20} = 1.2 \times 1.05^{(20-23)}$$

$$\text{SOUR}_{20} = 1.2 \times 1.05^{(-3)} \text{ or } 1.2 \times \frac{1}{1.05^3}$$

$$\text{SOUR}_{20} = 1.2 \times 0.864$$

$$\text{SOUR}_{20} = 1.04 \text{ or } 1.0$$

**SOUR Analysis; the Tips for Techs version**

- **Prepare raw data sheet**
- **Calibrate the apparatus that will be used to measure the dissolved oxygen**
- **Collect sample**
- **Place the sample into the sample test vessel**
- **Read and record dissolved oxygen levels in the sample at fixed time intervals**
- **Perform the appropriate solids analysis on the undiluted sample**
- **Calculate results, adjust for temperature if necessary**

NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PD0001620091109\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

STREET ADDRESS:

**Central District Office**

MAILING ADDRESS:

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

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

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

November 9, 2009

Steve Leister  
Flying J Travel Plaza  
10480 Baltimore Road  
Millersport, OH 43046

**Re: Flying J - Kirkersville Reconnaissance Inspection (4DP00016\*AP)  
Licking County**

Dear Mr. Leister:

On Tuesday, October 27, 2009, I made a brief reconnaissance inspection of your wastewater pretreatment system. During the site inspection, I noted the following items:

1. A berm was constructed around the sand filters as requested in my previous letter dated August 5, 2009.
2. The sand filters were still ponding. As stated in my previous letter, it is recommended to replace the sand filter media. Please see attached pictures.
3. The lift station appeared to be working well.

**The following actions are required by Flying J Travel Plaza - Kirkersville.**

1. Please provide an update regarding the transfer of the off-site lift station to the Village of Kirkersville.
2. It is recommended to replace the sand filter media or take other steps to prevent the ponding of the wastewater on the sand filters.
3. Preventative maintenance should be performed on wastewater treatment plant components. Upgrades to the system should be evaluated for your treatment system and made accordingly.

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

Steve Leister  
Flying J Travel Plaza  
Page -2-

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: [greg.sanders@epa.state.oh.us](mailto:greg.sanders@epa.state.oh.us).

Sincerely,



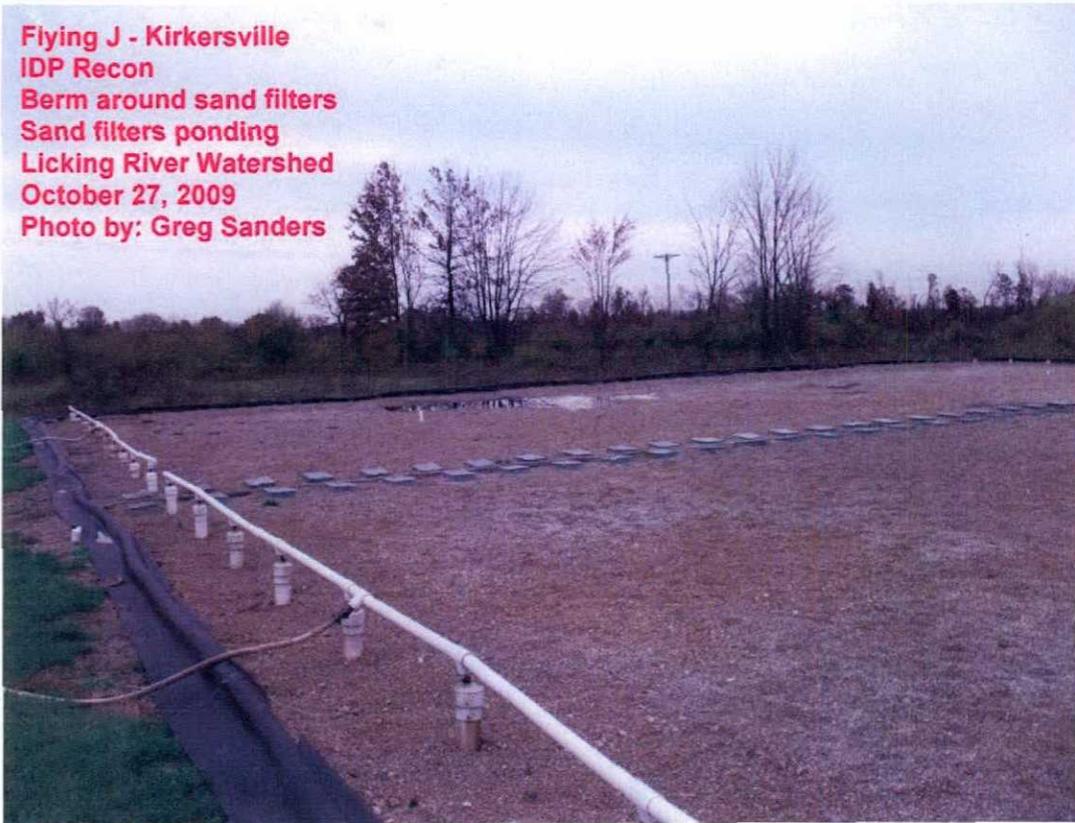
Gregory L. Sanders  
Environmental Specialist  
Division of Surface Water  
Central District Office

Enclosure

c: Ryan Laake, Ohio EPA, DSW/CO  
Tim Shumaker, TCCI Laboratories, Inc.  
Gayle Smith, P.E., Flying J

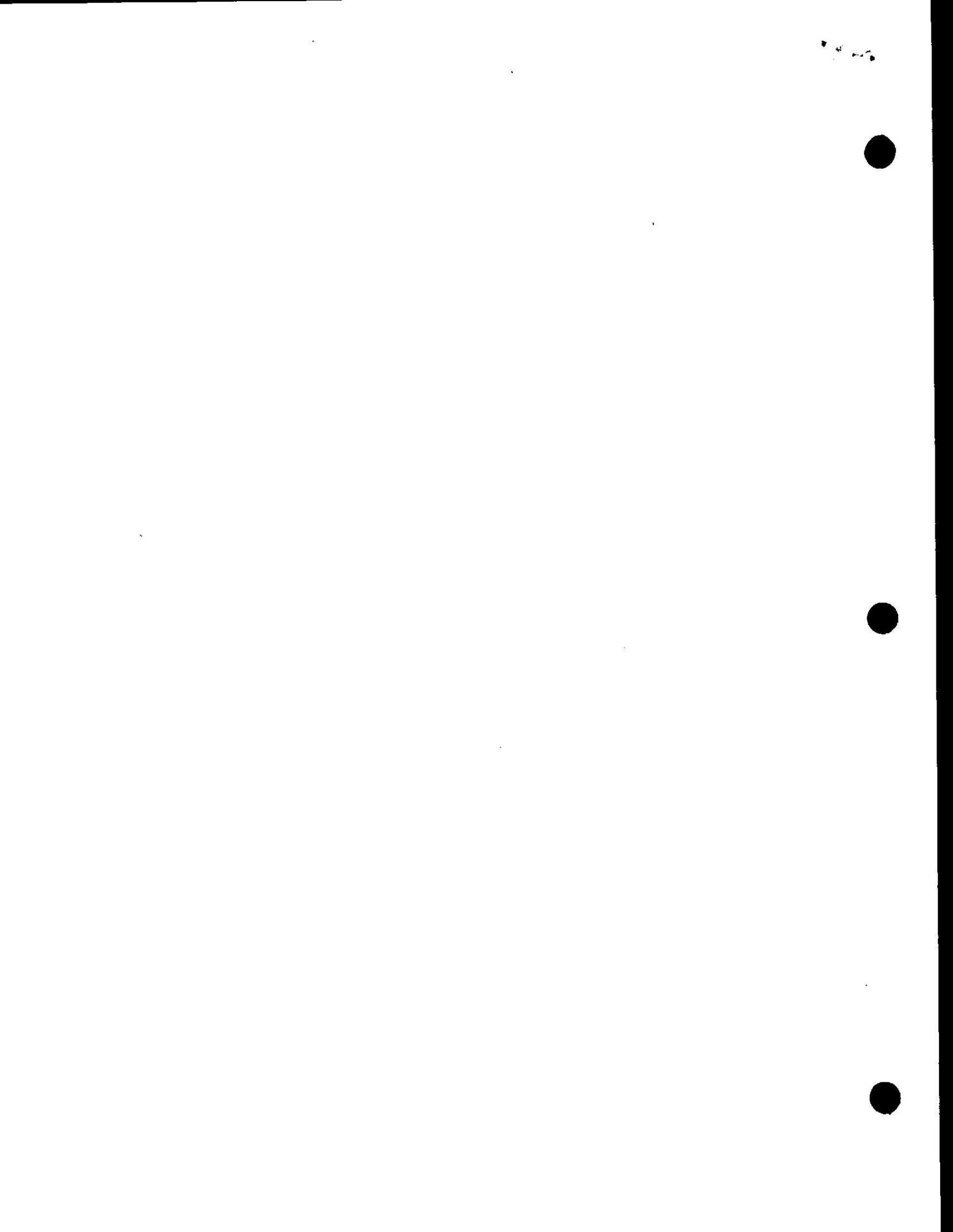
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**Flying J - Kirkersville  
IDP Recon  
Berm around sand filters  
Sand filters ponding  
Licking River Watershed  
October 27, 2009  
Photo by: Greg Sanders**



**Flying J - Kirkersville  
IDP Recon  
Berm around sand filters  
Sand filters ponding  
Licking River Watershed  
October 27, 2009  
Photo by: Greg Sanders**





NOV Bar Code Separator Sheet Template – use this sheet to correct permit number information when errors are found



\*4PD0001620090805\*

- Type the correct permit number and date in both lines
- Highlight the upper line
- Change the font to Code3of9High



State of Ohio Environmental Protection Agency

RECEIPT ADDRESS:

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

Central District Office

TELE: (614) 728-3776 FAX: (614) 728-3898  
www.epa.state.oh.us

MAILING ADDRESS:

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

August 5, 2009

Steve Leister  
Flying J Travel Plaza  
10480 Baltimore Road  
Millersport, OH 43046

**Re: Flying J - Kirkersville Reconnaissance Inspection (4DP00016\*AP)  
Licking County**

Dear Mr. Leister:

Thank you for taking time to meet with me on Thursday, July 30, 2009. During the site visit we discussed the malfunction of the compressor which serves the sand filters. The reason for the reconnaissance inspection was due to an illegal discharge from the sand filters to the adjacent swale along the wastewater treatment plant site.

Attached you will find my report and observations from the reconnaissance inspection. The following items were identified.

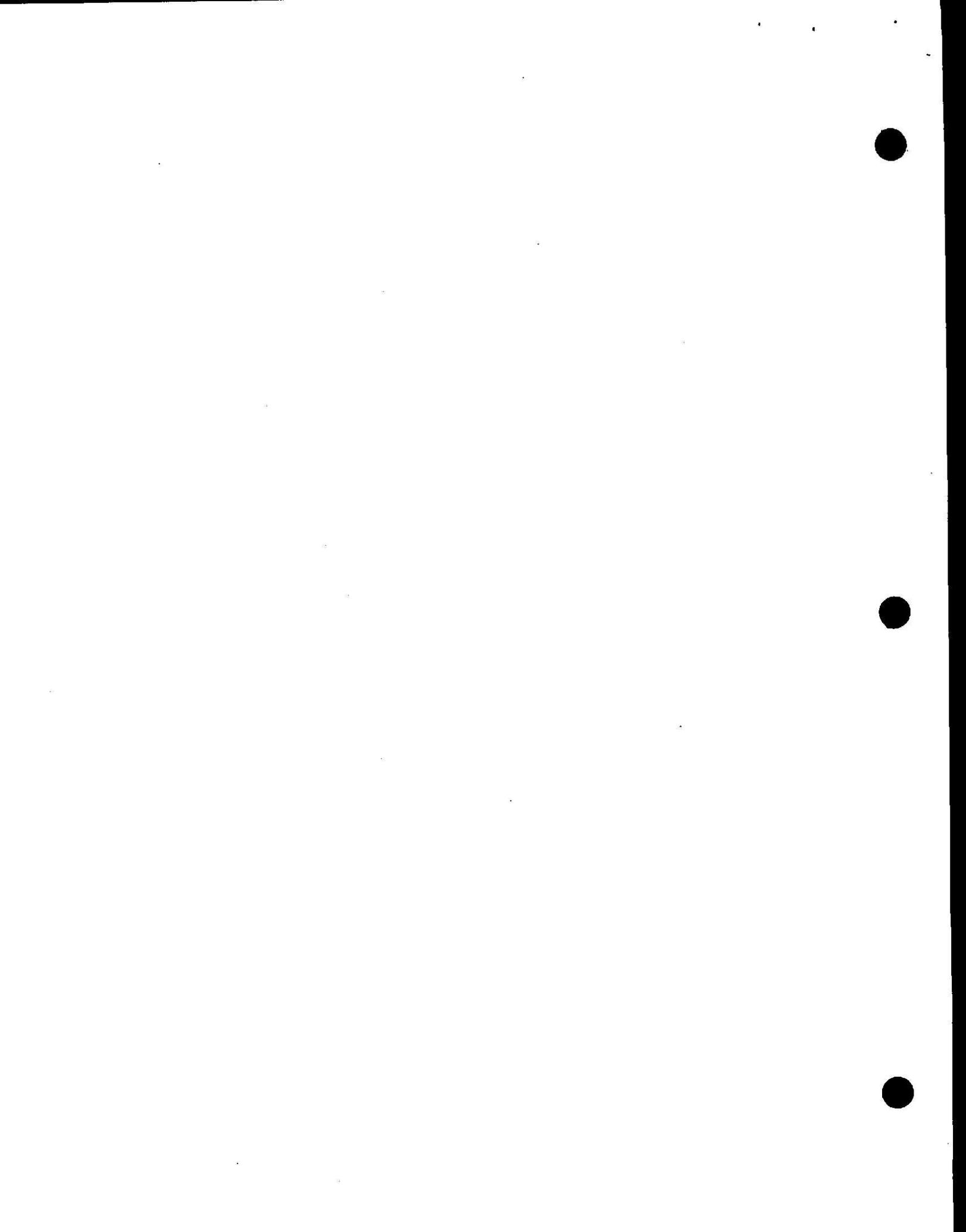
1. The recirculating sand filters were ponding and appeared to be overflowing from the filter beds. Compressed air was being used from a new rental compressor. Please see attached pictures.
2. The lift station on the north side of Interstate 70 appeared to be repaired and in operation.

**The following actions are required by Flying J Travel Plaza - Kirkersville.**

1. A berm or secondary containment should be constructed around the sand filters.
2. It is recommended to replace the sand filter media.
3. Preventative maintenance should be performed on wastewater treatment plant components. This is the second failure within 45 days that has caused an illegal bypass of your wastewater treatment system. Upgrades to the system should be evaluated for your treatment system and made accordingly.

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





Steve Leister  
Flying J Travel Plaza  
Page -2-

Ohio EPA looks forward to working with Flying J Travel Plaza to ensure continuing compliance with pretreatment requirements and the indirect discharge permit. If you need additional information or assistance, please feel free to contact me by phone at (614) 728-3851 or e-mail at: [greg.sanders@epa.state.oh.us](mailto:greg.sanders@epa.state.oh.us).

Sincerely,

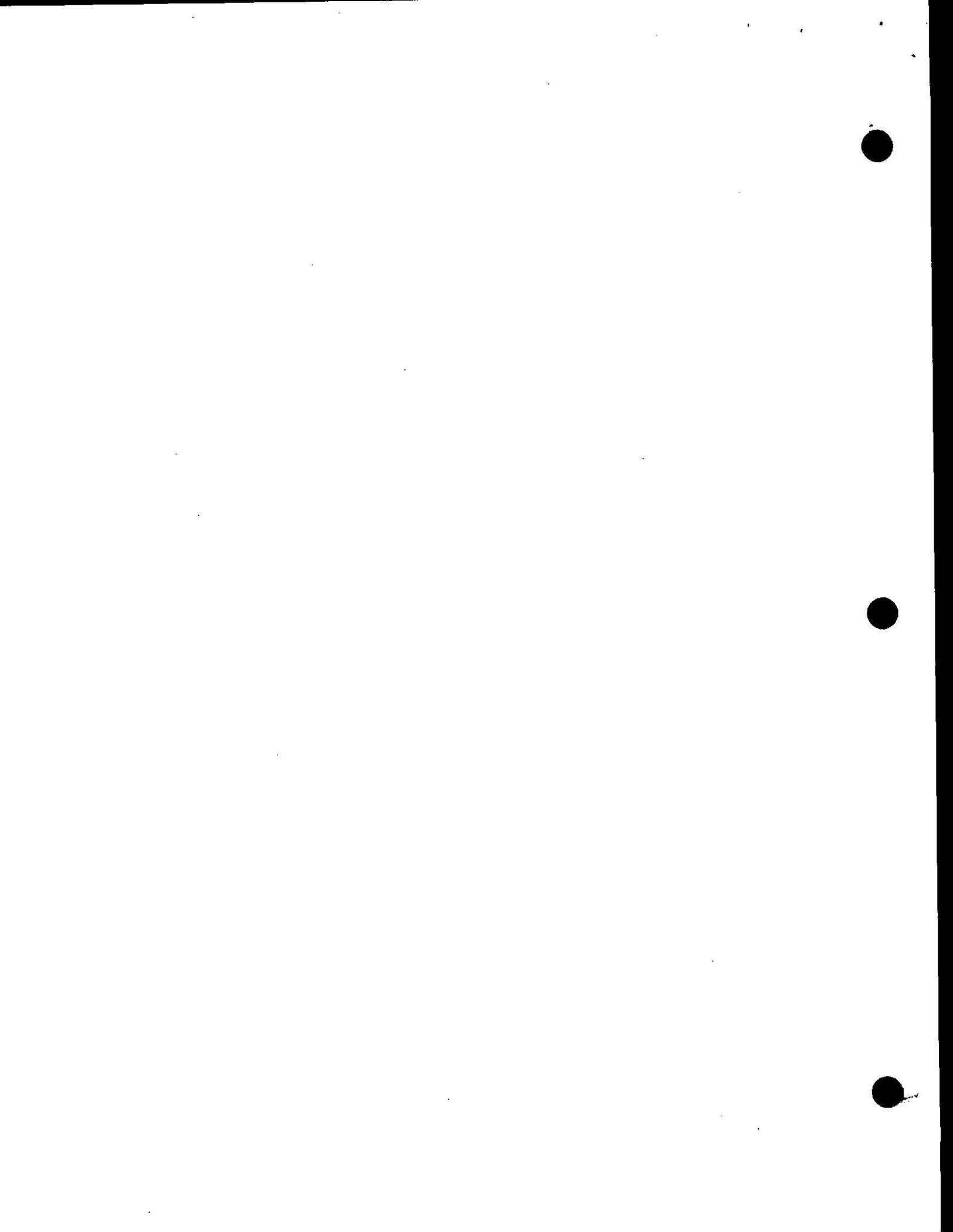


Gregory L. Sanders  
Environmental Specialist  
Division of Surface Water  
Central District Office

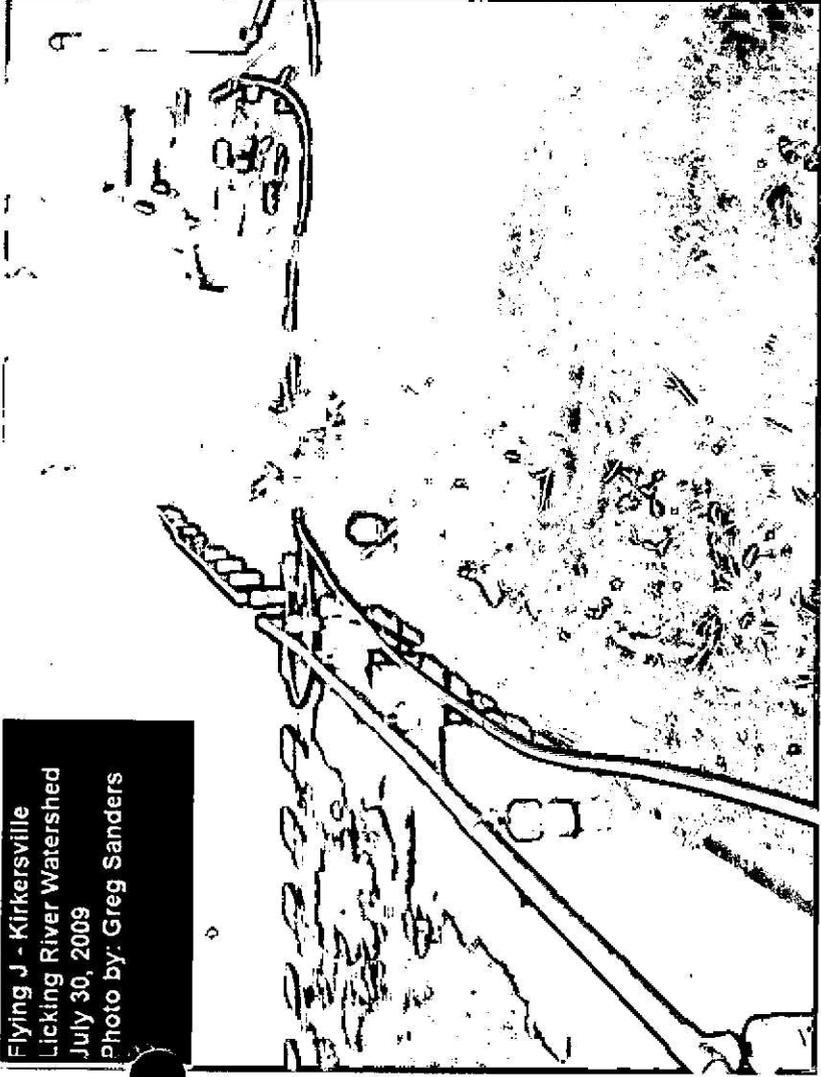
Enclosure

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Tim Shumaker, TCCI Laboratories, Inc.  
Gayle Smith, P.E., Flying J

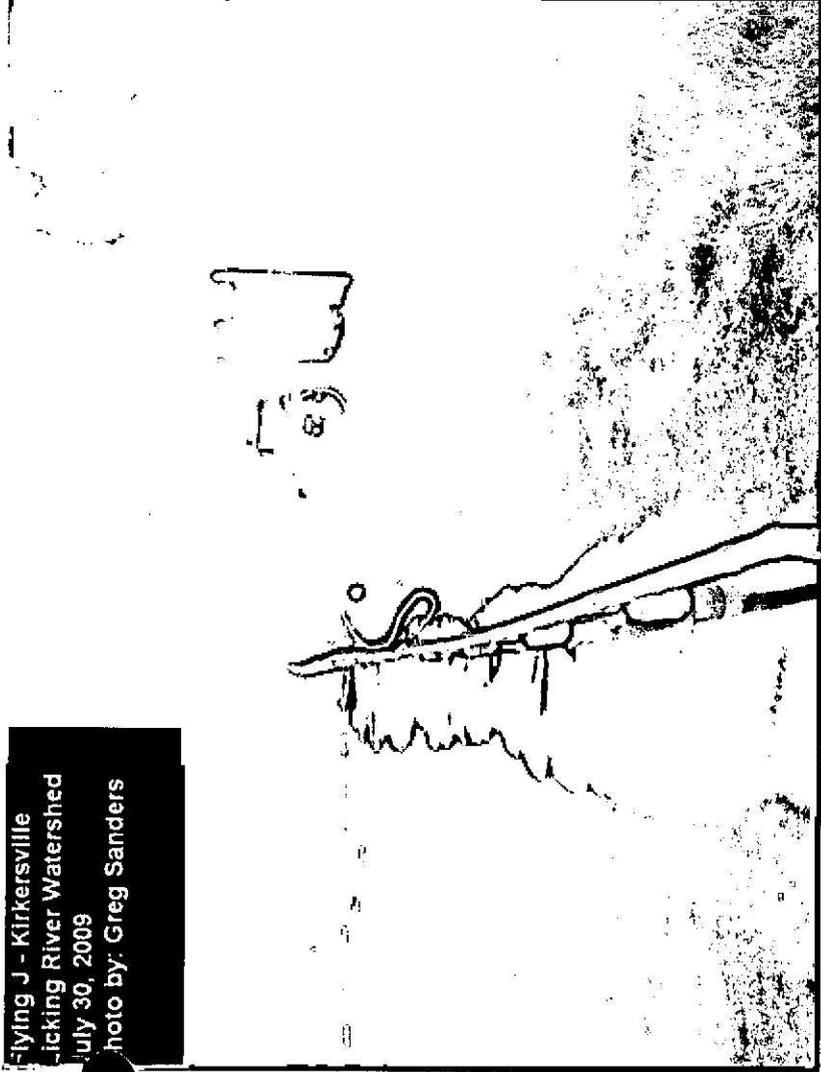
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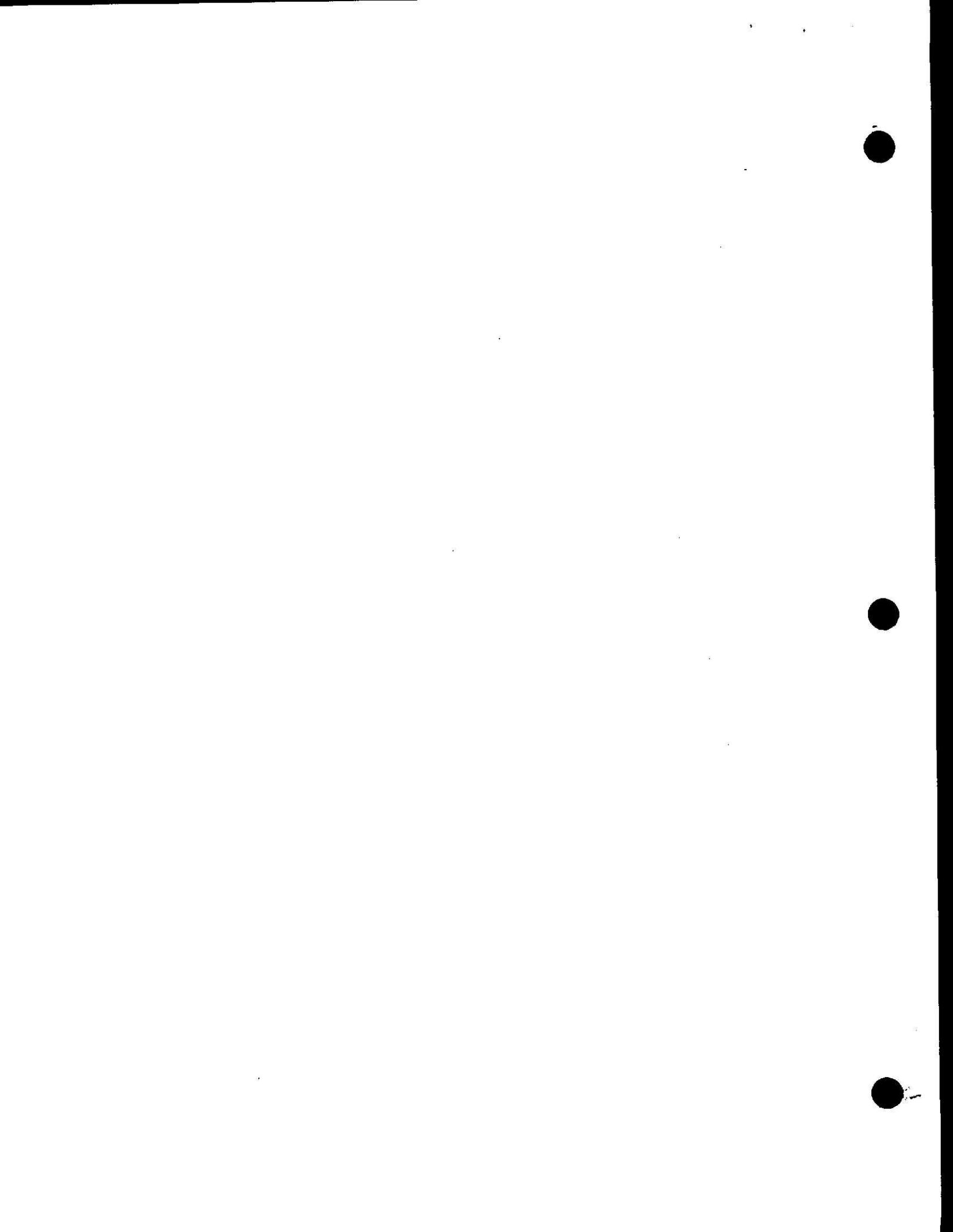


Flying J - Kirkersville  
Licking River Watershed  
July 30, 2009  
Photo by: Greg Sanders



Flying J - Kirkersville  
Licking River Watershed  
July 30, 2009  
Photo by: Greg Sanders



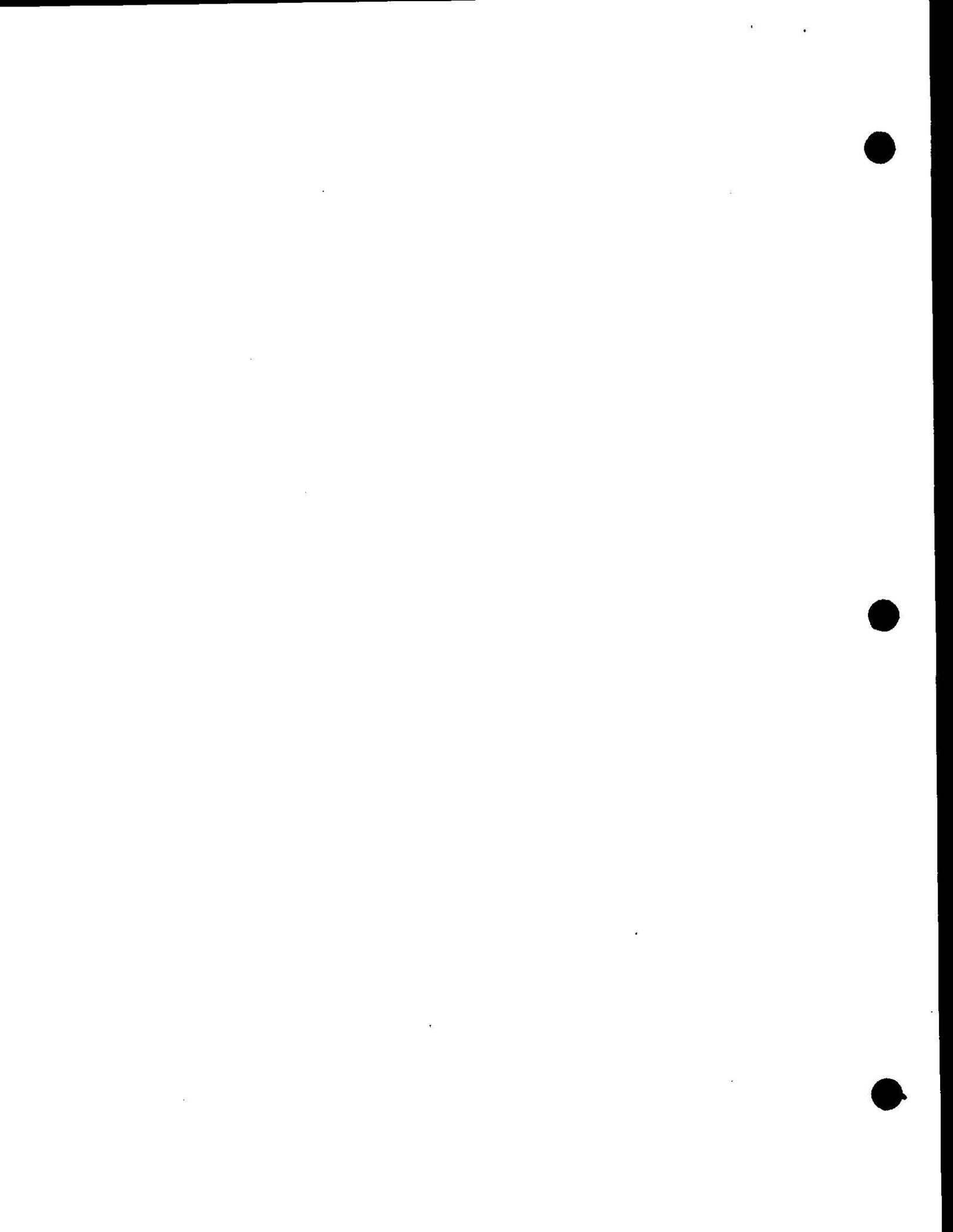


Flying J - Kirkersville  
Licking River Watershed  
July 30 2009  
Photo by Greg Sanders



Flying J - Kirkersville  
Licking River Watershed  
July 30 2009  
Photo by Greg Sanders





# OhioEPA PRETREATMENT INSPECTION REPORT

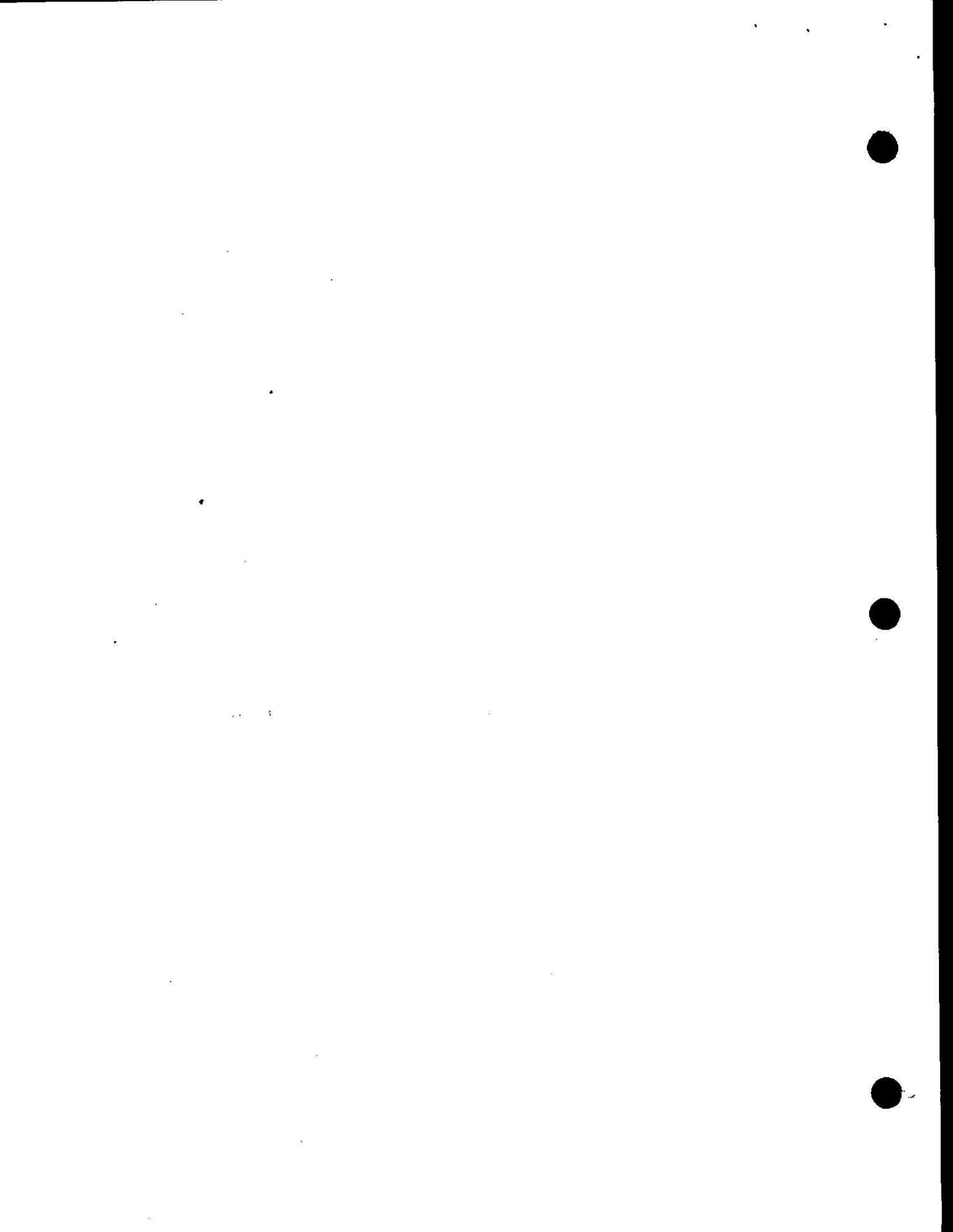
## State of Ohio Environmental Protection Agency

NPDES PERMIT NUMBER <b>OHP000227</b>		FACILITY PERMIT NUMBER <b>4DP00016*AP</b>		DATE CONDUCTED <b>7/30/2009</b>	
INSPECTION TYPE <b>R</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>2</b>	TIME IN <b>7:00 am</b>	TIME OUT <b>8:15 am</b>	

<b>GENERAL INFORMATION</b>	
Name and Location of Facility <b>Flying J Travel Plaza - Kirkersville 10480 Baltimore Road Kirkersville, OH 43046</b>	POTW Receiving Discharge <b>Village of Kirkersville</b>
Mailing Address of Facility <b>same</b>	Categorical Standard(s) or other Classification <b>Gas Station and Travel Plaza</b>
Contact (Name/Title/Phone) <b>Steve Leister Senior Facility Manager dfm.kirk@flyingj.com 740.964.9601</b>	Other Notes: <b>Frank Khalilpour, General Manager - Flying J  Tim Shumaker of TCCI contracts to operate &amp; maintain plant.</b>

<b>FACILITY EVALUATION</b> (S - Satisfactory, M - Marginal, U - Unsatisfactory, NE - Not Evaluated, O - Other)			
<b>NE</b>	<b>General Facility Operation</b>	<b>U</b>	<b>Pretreatment System Compressor not working for sand filters. Sand filters overflowing to adjacent swale. See attached sheet.</b>
<b>NE</b>	<b>Permit Compliance (Effluent Limitations)</b>	<b>NE</b>	<b>Self-Monitoring and Reporting</b>

Name and Signature of Inspector <b>Gregory Sanders</b> <i>Greg Sanders</i>	Agency / Office / Telephone <b>OEPA/DSW/CDO/(614)728-3851</b>	Date <b>8/5/09</b>
Signature of Reviewer <b>Jeff Bohne, Supervisor</b> <i>Jeff Bohne</i>	Agency / Office <b>OEPA/DSW/CDO/(614)728-3841</b>	Date <b>8/5/09</b>



**Additonal Notes:**

I received a call from Tim Schumaker of TCCI at 8:52 am on Tuesday, July 28, 2009, regarding the Flying J at Kirkersville's wastewater treatment plant. Mr. Schumaker stated that the compressor which provides air to the piping system of the sand filters was not working. The compressor has been needed for the past several years due to clogging of the media in the sand filters. Due to the compressor being out of service and the hard rains received in the early morning of Tuesday, July 28, 2009, the sand filters were overflowing and discharging to the adjacent swale along the treatment plant site. The swale discharges to the storm water basin which serves the Flying J facility. Mr. Schumaker stated that a new compressor would be on-line by noon of July 28, 2009.

I inspected the facility on Thursday morning of July 30, 2009. A compressor was operating and blowing air into the piping system of the sand filters. The sand filters were still ponding and a small amount of wastewater was discharging from the sand filters on to the ground.

I discussed the situation with Frank Khalipour, General Manager, and Steve Leister, Senior Facility Manager, of Flying J. They stated that TCCI proposed to install a ditch from the sand filters to the lift station wet well. I stated that this would allow the sand filters to be bypassed and that treatment components should not be bypassed. I suggested a berm or secondary containment around the sand filters. Also, it is recommended to replace the sand filter media. It may be feasible to look into other treatment alternatives other than the existing sand filters. A permit to install application would need to be submitted and approved prior to new treatment components being installed. It was also discussed that an electric compressor be installed instead of relying on a diesel compressor which requires extensive staff hours.

