

**Environmental
Protection Agency**

John Kasich **Governor**
Mike DeWine **Lt. Governor**
Robert M. Whitely **Director**

August 1, 2010

RE: F D HARDWOODS, D & N DEVELOPMENT
OHIO EPA PERMIT 3PR00341
HARDY TWP., HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Dean Mullet
F D Hardwoods, D & N Development
7488 State Route 241
Millersburg, OH 44654

Dear Mr. Mullet:

On July 26, 2011, a site inspection was conducted at the above referenced facility at 7488 State Route 241, Hardy Township, Holmes County. The inspection was conducted by Dean Stoll, John Schmidt and Pam Korenewych of this office and Kraig Bucklew of the Holmes County Health Department. Roy Schlabach represented F D Hardwoods during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit and as a pre-permit inspection in conjunction with the renewal of your permit. The last compliance inspection was conducted on July 14, 2010.

The system consists of a 1,000 gallon trash trap, aerated equalization basin, 5,000 gallon extended aeration system with clarifier, dosing chamber, 432 SF surface sand filtration, chlorine disinfection, and dechlorination. Sludge management consists of sludge removal from the extended aeration system when needed to another POTW. The facility discharges to two large storage ponds (see attached pictures) located north of the facility. The facility has no backup power, but has alarms.

Observations

The following observations were made during the inspection.

1. A breaker had tripped and the flow equalization pumps were not operating at the start of the inspection. The breaker was set and the pumps were cycled and found operable. The blowers were operating and the flow equalization tank was receiving sufficient aeration.
2. The content of the aeration tank had a slight earthy odor, light brown color with good mixing. The blowers and alarms were cycled and found in operating condition. The tank was receiving sufficient aeration.

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3. The surface of the clarifier was clear. Effluent channels and weirs were in good condition. The sludge return lines were operating properly at the time of the inspection. The skimmer was operable at the time of the inspection.
4. Surface sand filters were operable and reasonably clean. The dosing pumps and alarms were cycled and found in operable condition. Water dosed to the sand filters was observed as clear and percolated freely through the media.
5. Chlorination and dechlorination systems were stocked with appropriate chemicals and operable at the time of the inspection. The tank contents were clear.
6. Ohio EPA understands that Robert Earnsberger performs operations and maintenance, monitors the facility, performs routine sampling, and reports data for this facility on the electronic discharge monitoring report (eDMR) system.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2010 through July 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

No limit violations were noted for the reporting period reviewed.

Reporting Violations

No reporting code violations were noted for the reporting period reviewed. It should be noted that monthly operating reports have not been submitted for the months of January 2011, February 2011, May 2011, and June 2011. Please submit these reports into the eDMR system as soon as possible.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Permit Violations

Failure to renew NPDES Permit Application: Ohio EPA notes that NPDES Permit No. 3PR00341*AD expired on April 30, 2008, and Ohio EPA can locate no records that a renewal application was submitted by F D Hardwoods. This was noted in letters dated April 6, 2009, and July 28, 2010, and was discussed with you by telephone. Please submit a renewal application as soon as possible, or as noted below, a land application plan may be submitted in lieu of the NPDES renewal. I previously provided NPDES Form 1, the Antidegradation Addendum, Form E, and associated instructions for your reference.

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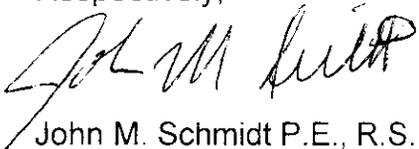
Comment

Requirement to Submit a Land Application Management Plan: Since issuance of NPDES Permit No. 3PR00341*AD, Ohio EPA has promulgated Ohio Administrative Code (OAC) Rule 3745-42-13 for land application systems. The rule became effective on July 1, 2007. As a system in operation prior to the effective date of the rule, OAC 3745-42-13(E)(2) requires that F D Hardwoods submit a land application management plan no later than July 1, 2012. The plan must comply with OAC 3745-42-13(E)(1), including applicable application requirements, design standards, siting restrictions, operations and maintenance requirements, and water quality/monitoring frequency requirements. The permit application components should follow the summary table outlined in OAC 3745-42-13(F) for a design flow of less than 10,000 gpd with a land application rate as appropriate. Base upon visual observations made during the July 14, 2010 and July 26, 2011 site visits, a land application rate of less than 12 inches per acre per year are anticipated. If this land application rate is used, then the permit application requirements should follow OAC 3745-42-13(F)(1), G, H, I, J, K (Table K-3 for Q<10,000 gpd), L, M, N, and O. A fact sheet on OAC 3745-42-13 and a copy of the actual rule for your reference in the July 28, 2010 letter.

Although the rule requires the plan no later than July 1, 2012, F D Hardwoods could submit a plan within 180 days in lieu of the NPDES permit renewal. If a plan is received within the next 180 days, Ohio may consider termination of the NPDES permit. If F D Hardwoods chooses to wait until the date prescribed by rule, then an NPDES permit renewal is required as soon as possible.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

pc: Kraig Bucklew, Holmes County Health Department
Robert Earnsberger

File: SP/Holmes Co./Hardy Twp./F D Hardwoods (3PR00341)