



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korieski, Director

July 28, 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 14, 2010, a site inspection was conducted at the above referenced facility at 7488 State Route 241, Hardy Township, Holmes County. The inspection was conducted by John Schmidt 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. The last compliance inspection was conducted on July 22, 2009.

The system consists of a 1,000 gallon trash trap, aerated equalization basin, 5,000 gallon extended aeration system with clarifier, dosing chamber, 432 square foot 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. The design flow of the extended aeration plant is 5,000 gallons per day. The extended aeration plant operates intermittently on a timer, with the sand filter operating on a float system in the dosing tank. The plant was not discharging to the storage ponds at the time of the inspection.
2. The content of the aeration tank had a slight earthy odor, was a light brown color, and had some foaming with good mixing. The blowers were running and the plant was receiving sufficient aeration. The plant color, foaming, and aeration are indicators that the plant is organically under loaded. A chocolate brown color is more typical of a properly operating aeration system.

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3. The surface of the clarifier was clear. Effluent channels and weirs were in good condition, but could use a periodic cleaning (see attached picture). 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 discharge to the filters when enough water accumulates to pump. The pumps were tested and only one was found operable. Pump "A" should be repaired as soon as possible and placed back into service. Water dosed to the sand filters was observed as clear.
5. Chlorination and dechlorination systems were stocked with appropriate chemicals and operable at the time of the inspection. The tank did not appear to have any flow due to lack of flow.
6. Ohio EPA understands that Robert (Bob) 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

F D Hardwoods operates under Permit 3PR00341*BD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period July 1, 2009 through July 1, 2010 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 or frequency violations were noted for the reporting period reviewed.

Compliance Schedule Violations

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

Other Permit Violations

The following violation is noted:

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. Please submit a renewal application as soon as possible. I have attached NPDES Form

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1, the Antidegradation Addendum, Form E, and associated instructions for your reference. Due to sloping fields and proximity to water sources, Ohio EPA considers your land application a potentially discharging system.

Comments

1. 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. Note that this is in addition to an NPDES permit renewal. 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 site visit, a land application rate of less than 12 inches per acre per year is 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. I have attached both a fact sheet on OAC 3745-42-13 and a copy of the actual rule for your reference.

Although the rule requires the plan no later than July 1, 2012, F D Hardwoods could submit a plan within 90 days in lieu of the NPDES permit renewal. If a plan is received within the next 90 days, Ohio EPA may consider termination of the NPDES permit. If F D Hardwoods chooses to wait until the date prescribed by the rule, then an NPDES permit renewal is required as soon as possible.

2. Notification of Operator of Record: Ohio EPA recommends that we be formally notified of your designated operator of record, as Ohio EPA maintains a database of operators associated with specific facilities. If the NPDES Permit is renewed, it will become a requirement of the permit, as well as the land application plan. A copy of the single page notification form may be found at http://epa.ohio.gov/portals/35/opcert/Operator_of_Record_Notification_Form.pdf. Please submit this form to Ohio EPA's Operator Certification Unit with a copy provided to my attention at the Northeast District Office.

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Based on the above information, F D Hardwoods is considered to be in substantial compliance with the terms and conditions of its NPDES permit. However, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

Att: Land Application Fact Sheet, OAC 3745-42-13

pc: Kraig Bucklew, Holmes County Health Department

File: F D Hardwoods (Hardy Twp) Holmes Co./Semipublic P/C



Wastewater Holding Ponds



Clarifier Effluent Weir