



Environmental  
Protection Agency

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

June 20, 2011

RE: HILLTOP GROUP HOME  
NPDES PERMIT NO. 3PR00448  
HARDY TOWNSHIP, HOLMES COUNTY  
COMPLIANCE INSPECTION EVALUATION

Mr. David B. Bird, Owner  
Hilltop Group Home, Inc.  
8961 County Road 393  
Millersburg, OH 44654

Dear Mr. Bird:

On June 15, 2011, a site inspection was conducted at the above referenced facility at 8951 County Route 393. The inspection was conducted by John Schmidt of this office. 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 in conjunction with the renewal of said permit. The last compliance inspection was conducted on June 17, 2010.

The collection system consists of a gravity sewer system located north and east of the waste water treatment plant (WWTP) that connects a central group home and a collection of mobile homes. The treatment system consists of two 1,000 gallon septic tanks in series serving as a trash trap, a 15,000 gpd extended aeration system, clarification, and final discharge. There are no sand beds or disinfection facilities. Sludge management of sludge removal from the extended aeration tanks when needed to another POTW. The facility discharges to a ditch to the southwest of the facility along the east side ditch along the road/drive west of the facility south to Sapps Run. No backup power is provided to the facility, and the facility is provided with no alarms.

### **Observations**

Following are observations made during the inspection.

1. The overall condition of the treatment plant during this inspection was satisfactory with the plant maintained, considering its age and limited components.
2. The plant is operated by Kevin Dean on behalf of Hilltop Group Home. Mr. Dean collects samples, performs laboratory analyses, and electronically submits the data to the electronic discharge monitoring report (eDMR) system. Ohio EPA records reflect no operator of record form submitted for this facility.
3. A log book was present at the facility.
4. The content of the aeration tank had good mixing but a somewhat dark brown color. Some foam was evident in the clarifier and aeration tank, and sludge returns were a dark brown color with some foaming. This may be an indication that the sludge may be older than desired in a properly operating plant. Sludge should be periodically removed from the facility to maintain a healthy biological population.

5. The surface of the clarifier was clear, and the skimmer appeared to be operating as designed. Effluent weirs and channels were reasonably clean.
6. The system depends on a single blower to provide air to the aeration tank. Ohio EPA notes that Hilltop has secured a permit to construct a new facility, but has delayed implementation of that permit pending the arrival of sewers to the area to serve the proposed relocation of the County fairgrounds.
7. No sand filtration or disinfection system is provided.
8. The final discharge to Sapps Run appears of acceptable visual quality.

**NPDES Permit Compliance Review**

Hilltop Group Home operates its WWTP under NPDES Permit 3PR00448\*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2010 through May 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

**Limit Violations**

The following limit violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform	7D Conc	1000	15100.	7/1/2010
001	31616	Fecal Coliform	1D Conc	2000	8.	8/10/2010
001	00530	Total Suspended Solids	30D Conc	12	16.	11/1/2010
001	00530	Total Suspended Solids	1D Conc	18	19.	3/1/2011
001	00530	Total Suspended Solids	30D Conc	12	19.	3/1/2011
001	00530	Total Suspended Solids	30D Conc	12	23.	4/1/2011
001	80082	CBOD 5 day	30D Conc	10	12.	4/1/2011
001	00530	Total Suspended Solids	1D Conc	18	23.	4/7/2011

Part III, Item 12 of your permit requires you to notify Ohio EPA of violations of your permit, including a rationale as to why these violations occurred, along with measures to ensure that they are not repeated. The bacteria entry for August 10, 2010 appears to be a data entry error. To-date, no notifications have been provided to Ohio EPA. These exceedances must be explained, along with measures to ensure that they are not repeated.

**Reporting Violations**

The following reporting code violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	31616	Fecal Coliform			AK	6/2/2010

This reporting code indicates that fecal coliform colonies were too numerous to count.

Mr. David B. Bird  
 Hilltop Group Home  
 June 20, 2011  
 Page 3

Ohio EPA notes numerous reporting frequency violations related to color, odor, turbidity during this review period which are not summarized individually. These violations appear to be a failure to take daily readings of color, odor, and turbidity on days that the WWTP is not visited by your contract operator. In a letter dated July 28, 2010, your operator, Dean's Backflow Service, indicated that he has spoken with you and your maintenance people about the need to collect this data. Part III, Item 12 of your permit requires you to notify Ohio EPA of violations of your permit, including a rationale as to why these violations occurred, along with measures to ensure that they are not repeated. To-date, no notifications have been provided to Ohio EPA. These reporting code and reporting frequency violations should be explained, along with measures to ensure that they are not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to [James.Roberts@epa.state.oh.us](mailto:James.Roberts@epa.state.oh.us) is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule

The following is a list of compliance schedule requirements as specified by your permit:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
02/01/2007	01/31/2012	10/01/2007	10/30/2008	01299	PTI & Plans	Submit Detail Plans
02/01/2007	01/31/2012	09/03/2011*	Not Completed	03099	Construction	Commence Construction
02/01/2007	01/31/2012	01/31/2012*	Not Completed	04599	Construction	Complete Construction
02/01/2007	01/31/2012	01/31/2012*	Not Completed	05599	Operations	Attain Effluent Limits

Ohio EPA understands that sanitary sewers are contemplated along CR 393 to serve new county fairgrounds, and that you desire to tie in to those sewers once they become available. No additional information to respond to the compliance schedule is needed at this time.

Other NPDES Permit Violations

Ohio EPA notes the following additional violations of your NPDES permit:

1. Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Ohio EPA understands that Hilltop Group Home, Inc. contracts with Dean's Backflow Service as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA at the address listed on the form. As a courtesy, please provide a copy of this form in your response to this office.
2. Annual Sludge Report - Ohio EPA notes that Part II, Item K of your NPDES permit requires you to submit a report no later than January 31<sup>st</sup> summarizing the sewage

Mr. David B. Bird  
Hilltop Group Home  
June 20, 2011  
Page 4

sludge disposal, use, storage, or treatment activities during the previous calendar year. Ohio EPA's files reflect that Hilltop Group Home, Inc. has never submitted this report since the NPDES permit was issued in 2007. Please submit the report as prescribed by your NPDES permit.

Based on the above information, Hilltop Group Home is considered to be in marginal compliance with the terms and conditions of the NPDES permit. The above items must be addressed.

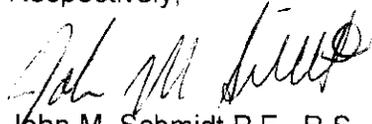
Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the 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.

**Comment**

NPDES Renewal: Ohio EPA notes that your current permit will expire on January 31, 2012. As required by your permit, an NPDES renewal application must be submitted no later than 180 days prior to the expiration of your current permit. Your permit renewal is therefore must be submitted no later than July 31, 2011.

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

encl: Operator of Record form (rev 10/09)

cc: Kevin Dean, Dean's Backflow Service

File: SP/Holmes Co./Hardy Twp./Hilltop Group Home (3PR00448\*AD)