



**Environmental  
Protection Agency**

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

October 25, 2010

RE: INN AT HONEY RUN  
OHIO EPA PERMIT 3PR00320  
HARDY TOWNSHIP, HOLMES COUNTY  
COMPLIANCE INSPECTION EVALUATION

Mr. Dave Schlabach, Operator  
Phillip Jenkins, Owner  
Inn at Honey Run  
6920 County Road 203  
Millersburg, OH 44654

Dear Mr. Schlabach and Mr. Jenkins:

On October 19, 2010, a site inspection was conducted at the above referenced facility at 6920 County Road 203, Hardy Township, Holmes County. The inspection was conducted by John Schmidt and John Kwolek of this office. Jason Neis represented the Inn at Honey Run during the inspection. The facility is owned by Phillip Jenkins and operated by Dave Schlabach, with assistance from maintenance staff at the Inn at Honey Run. 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 April 7, 2009.

The system consists of a trash trap, equalization basin, lift station, extended aeration system with clarifier, lift station/dosing chamber, surface sand filtration, chlorine disinfection, dechlorination, and post-disinfection aeration. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The facility discharges to an unnamed tributary to Honey Run northeast of the facility. No backup power is provided to the facility and the facility is provided with alarms.

**Observations**

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 14,000 gallons per day. The extended aeration plant operates continuously, with the sand filter operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. The lift station pumps were cycled, and only one of the pumps was found operable. The pump should be inspected and necessary repairs made as soon as possible.

3. The content of the aeration tank had a no odor, light brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. The light color of the aeration tank and the return sludge lines is an indication that the clarifier sides are not being scraped to allow sludge to return to maintain the proper level of biological activity. Mr. Neis could not recall the last time that the clarifier sides were scraped.
4. The surface of the clarifier was reasonably clear. Effluent channels and weirs could use some cleaning (see attached pictures). Weirs should be cleaned weekly to bi-weekly. The sludge return lines were operating properly at the time of the inspection, but not returning much sludge. The skimmer was operating at the time of the inspection.
5. The sand filter dosing tank pumps were cycled and found in operable condition. The dosing tank had a significant accumulation of solids which must be removed. This suggests that there has been an upset in the extended aeration system.
6. Surface sand filters contained a significant amount of sludge and vegetation (see attached pictures). The vegetation has grown to such an extent that a significant root mass likely extends well into the sand layer. The vegetation and accompanying root mass must be removed and replaced with the appropriate sand. Sand beds should be weeded and raked weekly.
7. The chlorination tank contains vegetation that must be removed (see attached pictures). The chlorination system was stocked with appropriate chemicals and operating at the time of the inspection. The tank contents contained a lot of floating vegetative debris and had vegetation growing adjacent to the chlorine dosing unit (see attached pictures).
8. The dechlorination system was not stocked with the appropriate chemicals. This system must be in use during the disinfection season of May through October.
9. The final discharge pipe at Honey Run northeast of the plant was observed as discharging an effluent of acceptable visual quality.
10. Dave Schlabach monitors the facility, and performs the routine sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.

#### **NPDES Permit Compliance Review**

The Inn at Honey Run operates under Permit 3PR00320\*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2009 through October 1, 2010 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         | 30D Conc   | 1000  | 1000.          | 9/1/2009       |
| 001     | 31616          | Fecal Coliform         | 30D Conc   | 1000  | 6800.          | 6/1/2010       |
| 001     | 31616          | Fecal Coliform         | 7D Conc    | 2000  | 6800.          | 6/15/2010      |
| 001     | 00530          | Total Suspended Solids | 30D Qty    | 0.64  | 1.27176        | 7/1/2009       |
| 001     | 00530          | Total Suspended Solids | 7D Qty     | 0.95  | 1.27176        | 7/15/2009      |
| 001     | 00610          | Nitrogen, Ammonia (NH3 | 30D Conc   | 1.0   | 13.16          | 7/1/2009       |
| 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Conc    | 1.5   | 13.16          | 7/15/2009      |
| 001     | 00610          | Nitrogen, Ammonia (NH3 | 30D Qty    | 0.053 | 2.39091        | 7/1/2009       |
| 001     | 00610          | Nitrogen, Ammonia (NH3 | 7D Qty     | 0.08  | 2.39091        | 7/15/2009      |
| 001     | 00400          | pH                     | 1D Conc    | 9.0   | 9.2            | 6/9/2009       |
| 001     | 00400          | pH                     | 1D Conc    | 6.5   | 6.2            | 11/3/2009      |
| 001     | 31616          | Fecal Coliform         | 30D Conc   | 1000  | 1000.          | 8/1/2009       |

These effluent violations should 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     | 00083          | Color, Severity     |            |       | AD             | 8/1/2009       |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/1/2009       |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/1/2009       |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/1/2009       |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/2/2009       |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/2/2009       |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/2/2009       |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/2/2009       |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/8/2009       |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/8/2009       |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/8/2009       |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/8/2009       |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/9/2009       |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/9/2009       |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/9/2009       |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/9/2009       |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/15/2009      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/15/2009      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/15/2009      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/15/2009      |

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| Station | Reporting Code | Parameter           | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|---------------------|------------|-------|----------------|----------------|
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/16/2009      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/16/2009      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/16/2009      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/16/2009      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/22/2009      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/22/2009      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/22/2009      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/22/2009      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/23/2009      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/23/2009      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/23/2009      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/23/2009      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/29/2009      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/29/2009      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/29/2009      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/29/2009      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 8/30/2009      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 8/30/2009      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 8/30/2009      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 8/30/2009      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/6/2010       |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/6/2010       |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/6/2010       |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/6/2010       |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/7/2010       |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/7/2010       |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/7/2010       |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/7/2010       |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/13/2010      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/13/2010      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/13/2010      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/13/2010      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/14/2010      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/14/2010      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/14/2010      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/14/2010      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/20/2010      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/20/2010      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/20/2010      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/20/2010      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/21/2010      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/21/2010      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/21/2010      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/21/2010      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/27/2010      |

| Station | Reporting Code | Parameter           | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|---------------------|------------|-------|----------------|----------------|
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/27/2010      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/27/2010      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/27/2010      |
| 001     | 00083          | Color, Severity     |            |       | AD             | 3/28/2010      |
| 001     | 01330          | Odor, Severity      |            |       | AD             | 3/28/2010      |
| 001     | 01350          | Turbidity, Severity |            |       | AD             | 3/28/2010      |
| 001     | 50050          | Flow Rate           |            |       | AD             | 3/28/2010      |

These reporting code violations should be explained, along with measures to ensure that they are not repeated. The "AD" code is to be used when an automatic analyzer used to collect samples is out of service. Ohio EPA notes that odor, color, and turbidity are visual estimations that do not require an analyzer. Flow rate is a 24-hour total estimate that also does not require an analyzer. Note that the reporting code "AD" is not the code to be used when the plant is normally staffed (i.e. weekends and holidays), the "AN" code should be used for the days when the plant is normally staffed.

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

| Station | Reporting Code | Parameter                | Sample Frequency | Expected | Reported | Violation Date |
|---------|----------------|--------------------------|------------------|----------|----------|----------------|
| 001     | 00010          | Water Temperature        | 1/Week           | 1        | 0        | 05/01/2009     |
| 001     | 00530          | Total Suspended Solids   | 1/Month          | 1        | 0        | 05/01/2009     |
| 001     | 00610          | Nitrogen, Ammonia (NH3)  | 1/Month          | 1        | 0        | 05/01/2009     |
| 001     | 31616          | Fecal Coliform           | 1/Month          | 1        | 0        | 05/01/2009     |
| 001     | 80082          | CBOD 5 day               | 1/Month          | 1        | 0        | 05/01/2009     |
| 001     | 50060          | Chlorine, Total Residual |                  | 1        | 0        | 05/01/2009     |
| 001     | 00400          | pH                       | 1/2Weeks         | 1        | 0        | 05/01/2009     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 05/01/2009     |
| 001     | 00010          | Water Temperature        | 1/Week           | 1        | 0        | 05/08/2009     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 05/08/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/12/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/13/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/14/2009     |
| 001     | 00010          | Water Temperature        | 1/Week           | 1        | 0        | 05/15/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/15/2009     |
| 001     | 50060          | Chlorine, Total Residual | 1/2Weeks         | 1        | 0        | 05/15/2009     |
| 001     | 00400          | pH                       | 1/2Weeks         | 1        | 0        | 05/15/2009     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 05/15/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/16/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/17/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/18/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/19/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/20/2009     |

| Station | Reporting Code | Parameter                | Sample Frequency | Expected | Reported | Violation Date |
|---------|----------------|--------------------------|------------------|----------|----------|----------------|
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/21/2009     |
| 001     | 00010          | Water Temperature        | 1/Week           | 1        | 0        | 05/22/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/22/2009     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 05/22/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/23/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/24/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/25/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/26/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/27/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/28/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/29/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/30/2009     |
| 001     | 50050          | Flow Rate                | 1/Day            | 1        | 0        | 05/31/2009     |
| 001     | 00530          | Total Suspended Solids   | 1/Month          | 1        | 0        | 04/01/2010     |
| 001     | 00610          | Nitrogen, Ammonia (NH3)  | 1/Month          | 1        | 0        | 04/01/2010     |
| 001     | 80082          | CBOD 5 day               | 1/Month          | 1        | 0        | 04/01/2010     |
| 001     | 31616          | Fecal Coliform           | 1/Month          | 1        | 0        | 05/01/2010     |
| 001     | 31616          | Fecal Coliform           | 1/Month          | 1        | 0        | 08/01/2010     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 08/08/2010     |
| 001     | 50060          | Chlorine, Total Residual | 1/2Weeks         | 1        | 0        | 08/15/2010     |
| 001     | 00400          | pH                       | 1/2Weeks         | 1        | 0        | 08/15/2010     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 08/15/2010     |
| 001     | 00300          | Dissolved Oxygen         | 1/Week           | 1        | 0        | 08/22/2010     |

It appears that daily, weekly, and bi-weekly readings for selected parameters were not collected. **These readings must be taken and reported in the eDMR.** The Owner and Operator should clarify responsibilities for noting the daily readings (except weekends and holidays) in the facility log and to ensure that they are properly reported in the eDMR. Reporting codes for weekends and holidays should be used as necessary. These 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 Violations

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

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Other Violations: 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. Part II, Item B requires you to designate an operator of record and notify Ohio EPA of the designated operator of record. Ohio EPA understands that the Inn at Honey Run contracts with Dave Schlabach 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.

Based on the above information, the Inn at Honey Run is considered to be in marginal compliance with the terms and conditions of its 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.**

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

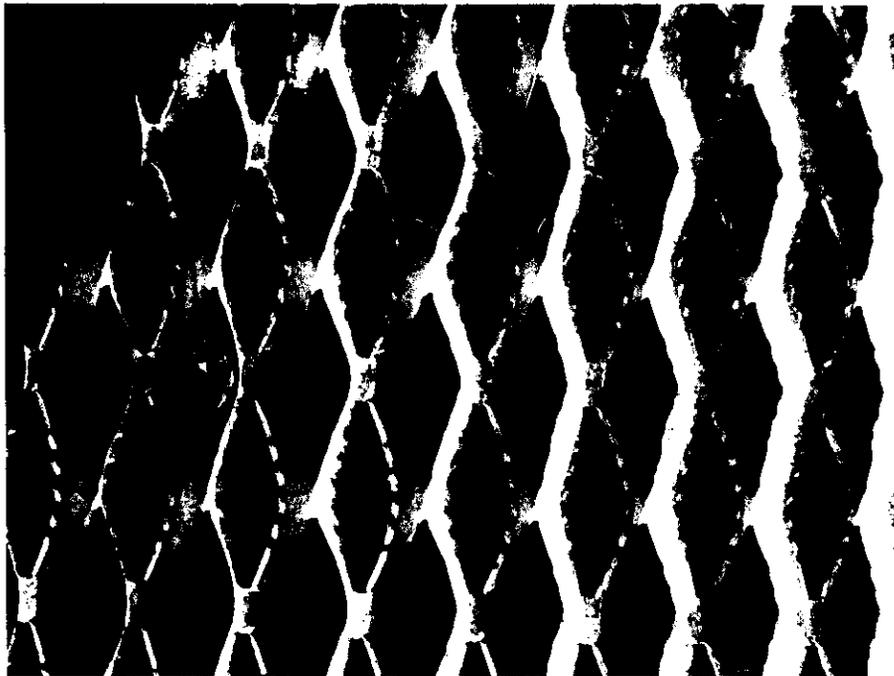
att: Operator of Record Notification Form, rev 02/2008

pc: Kraig Bucklew, Holmes County Health Department

File: Semipublic/Holmes/Hardy Twp/the Inn at Honey Run



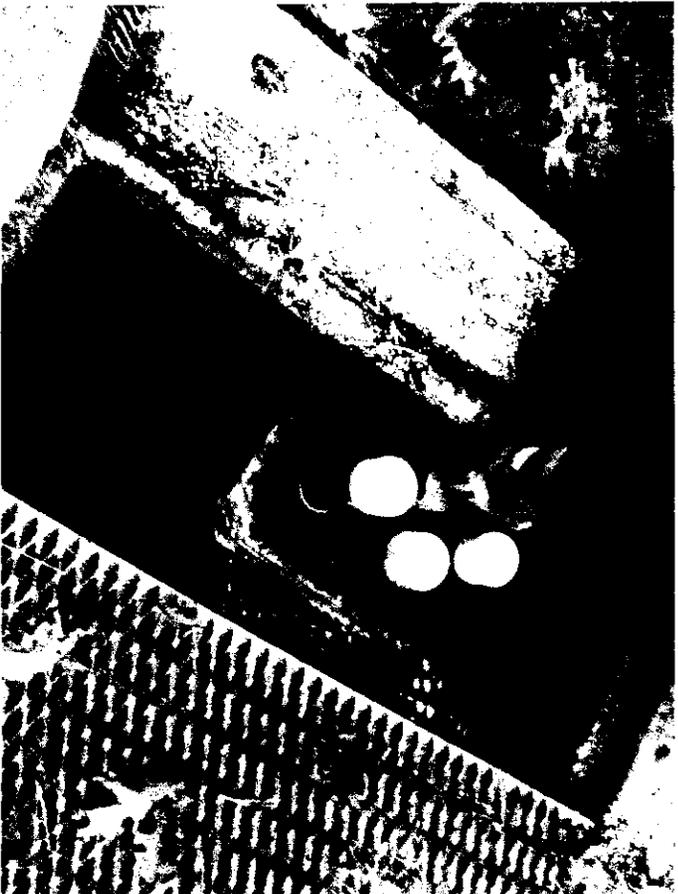
**Return Sludge Quality – Light Brown and Watery, Vegetation Accumulation**



**Sand Filter Dosing Tank Solids Accumulation**



Vegetation and Sludge Accumulation in sand Filters



Chlorine Contact Tank