

**Environmental  
Protection Agency**

John T. Kasich, Governor  
Mark Taylor, Lt. Governor  
Eric J. Smith, Director

August 1, 2011

RE: YODER LUMBER – BUCKHORN DIVISION  
OHIO EPA PERMIT 3PR00402  
MECHANIC TOWNSHIP, HOLMES COUNTY  
COMPLIANCE EVALUATION INSPECTION

Mr. Tom Nelson, Director of Safety  
Yoder Lumber, Buckhorn Division  
7100 County Route 407  
Millersburg, OH 44654

Dear Mr. Nelson:

On July 26, 2011, a site inspection was conducted at the above referenced facility at 7100 County Route 407, Mechanic 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. You and Jake Yoder represented Yoder Lumber, Buckhorn Division (Yoder) 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 14, 2010.

**Observations**

The following observations were made during the inspection.

1. The influent pump station tank was noted as leaking, with wet soils noted between the pump station and the aeration tank. The source of the leak needs to be identified and repaired, and could be either the tank or piping. The pumps and alarms were cycled and found in operating condition.
2. The content of the aeration tank had a no odor, medium brown color with good mixing. The blowers and alarms were cycled and found in operating condition and the plant was receiving sufficient aeration. The return sludge lines were found in operating condition.
3. The contents of the clarifier were turbid. Effluent channels and weirs had an accumulation of algal growth on them, and should be cleaned. The skimmer was operating at the time of the inspection. Some of the grates were noted in deteriorated condition and must be replaced.
4. The sand filter dosing pumps and alarms were cycled and found in operating condition.

Mr. Tom Nelson  
Yoder Lumber, Buckhorn Division  
August 1, 2011  
Page 2

5. Surface sand filters were reasonably clean and operable. The sand in the one filter operating should be leveled to provide even distribution of the wastewater. The wall of the filters was noted as cracked behind the influent pipe serving the distribution box, and must be repaired.
6. Chlorination and dechlorination systems were stocked with appropriate chemicals and operable at the time of the inspection. The chlorine tank contents were clear.
7. The final discharge pipe at the pond southeast of the plant was not observed due to a lack of flow.
8. Outfall signage could not be located during the inspection. Your NPDES permit requires you to post a 2 foot by 2 foot outfall sign. Please provide documentation that this signage has been installed.
9. Ohio EPA understands that Kevin Dean of Kevin's Backflow Service performs the daily operations, 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**

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.

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. During the July 14, 2010 inspection, we spoke about the need to collect this data and your operator indicated he spoke with you in a letter to Ohio EPA dated September 24, 2010. 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 frequency violations should be explained, along with measures to ensure that they are not repeated.

Mr. Tom Nelson  
Yoder Lumber, Buckhorn Division  
August 1, 2011  
Page 3

Compliance Schedule Violations

No compliance schedule violations are noted for the time period reviewed.

**Comment**

Annual Sludge Report Review: A review of the annual sludge reports indicates that the Yoder Lumber has never reported sludge removal from this facility. Typically, some sludge is removed from a package wastewater treatment plant at least annually. Older sludge is not as efficient at biologically breaking down sludge as younger sludge and does not settle as well.

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

File: SP/Holmes/Mechanic Twp./Yoder Lumber – Buckhorn Division (3PR00402)