



**Environmental
Protection Agency**

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

October 4, 2010

RE: WEAVER LEATHER, LLC
OHIO EPA PERMIT 3PR00367
SALT CREEK TWP., HOLMES COUNTY
COMPLIANCE INSPECTION EVALUATION

Ms. Neena Miller, Vice President
Weaver Leather, LLC
Post Office Box 68
Mt Hope, OH 44660

Dear Ms. Miller:

On September 23, 2010, a site inspection was conducted at the above referenced facility at 7540 County Road 201, Salt Creek Township, Holmes County. The inspection was conducted by John Schmidt of this office and Kraig Bucklew of the Holmes County Health Department. Steve and Helena Miller represented Weaver Leather, LLC 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 September 10, 2008.

The system consists of a 1500 gallon trash trap, 2500 gallon equalization basin, 5000 gpd extended aeration system with clarifier, 1500 gallon lift station/dosing chamber, surface sand filtration, chlorine disinfection, dechlorination, and post-disinfection aeration. Sludge management consists of sludge removal from a 1500 gallon aerated sludge holding tank when needed to another POTW. The facility discharges to an unnamed tributary to a roadside ditch that flows to an unnamed tributary of Martins Creek southeast of the facility. No backup power is provided to the facility and the facility is provided with no 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 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 content of the aeration tank had no odor, chocolate brown color with good mixing. The blowers were running and the plant was receiving sufficient aeration. The plant color and aeration is an indicator of a properly operating aeration system.

3. The surface of the clarifier had evidence of solids not settling properly (see attached pictures). Further inspection indicated that the air lift pump was leaking air and aerating the clarifier, preventing solids from settling properly. The air lift pump line should be repaired as soon as possible as a part of ongoing maintenance. 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. The skimmer was operating at the time of the inspection.
4. Surface sand filters were reasonably clean and operable. A significant amount of sludge was noted in one of the filters that should be removed as a part of ongoing maintenance (see attached pictures). This is likely attributed to the clarifier lift pump issue. The dosing pumps discharge to the filters when enough water accumulates to pump. The pumps were tested and found operable.
5. Chlorination and dechlorination systems were stocked with appropriate chemicals and operating at the time of the inspection. The tank contents were clear.
6. The final discharge pipe at the catch basin along State Route 241 tributary to Martins Creek southeast of the plant was observed as not discharging.
7. Kurt Denny 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

Weaver Leather, LLC operates under Permit 3PR00367*BD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2008 through September 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	00610	Nitrogen, Ammonia (NH3)	30D Conc	3.0	3.43	12/1/2008

This effluent limit violation should be explained, along with measures to ensure that it is not repeated.

Reporting Violations

No reporting code violations were noted for the reporting period reviewed.

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

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Day	1	0	09/01/2008
001	01330	Odor, Severity	1/Day	1	0	09/01/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/01/2008
001	00056	Flow Rate	1/Day	1	0	09/01/2008
001	00083	Color, Severity	1/Day	1	0	09/03/2008
001	01330	Odor, Severity	1/Day	1	0	09/03/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/03/2008
001	00056	Flow Rate	1/Day	1	0	09/03/2008
001	00083	Color, Severity	1/Day	1	0	09/06/2008
001	01330	Odor, Severity	1/Day	1	0	09/06/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/06/2008
001	00056	Flow Rate	1/Day	1	0	09/06/2008
001	00083	Color, Severity	1/Day	1	0	09/07/2008
001	01330	Odor, Severity	1/Day	1	0	09/07/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/07/2008
001	00056	Flow Rate	1/Day	1	0	09/07/2008
001	00083	Color, Severity	1/Day	1	0	09/10/2008
001	01330	Odor, Severity	1/Day	1	0	09/10/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/10/2008
001	00056	Flow Rate	1/Day	1	0	09/10/2008
001	00083	Color, Severity	1/Day	1	0	09/13/2008
001	01330	Odor, Severity	1/Day	1	0	09/13/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/13/2008
001	00056	Flow Rate	1/Day	1	0	09/13/2008
001	00083	Color, Severity	1/Day	1	0	09/14/2008
001	01330	Odor, Severity	1/Day	1	0	09/14/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/14/2008
001	00056	Flow Rate	1/Day	1	0	09/14/2008
001	00083	Color, Severity	1/Day	1	0	09/20/2008
001	01330	Odor, Severity	1/Day	1	0	09/20/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/20/2008
001	00056	Flow Rate	1/Day	1	0	09/20/2008
001	00083	Color, Severity	1/Day	1	0	09/21/2008
001	01330	Odor, Severity	1/Day	1	0	09/21/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/21/2008
001	00056	Flow Rate	1/Day	1	0	09/21/2008
001	00083	Color, Severity	1/Day	1	0	09/27/2008

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	01330	Odor, Severity	1/Day	1	0	09/27/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/27/2008
001	00056	Flow Rate	1/Day	1	0	09/27/2008
001	00083	Color, Severity	1/Day	1	0	09/28/2008
001	01330	Odor, Severity	1/Day	1	0	09/28/2008
001	01350	Turbidity, Severity	1/Day	1	0	09/28/2008
001	00056	Flow Rate	1/Day	1	0	09/28/2008

It appears that the daily readings for color, odor, and turbidity were not collected for much of the month of September 2008. **These readings must be 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. E-mailing questions to 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.

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. 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, Weaver Leather, LLC is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its Mt. Hope facility; however the above items must be addressed.

Ms. Neena Miller
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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,



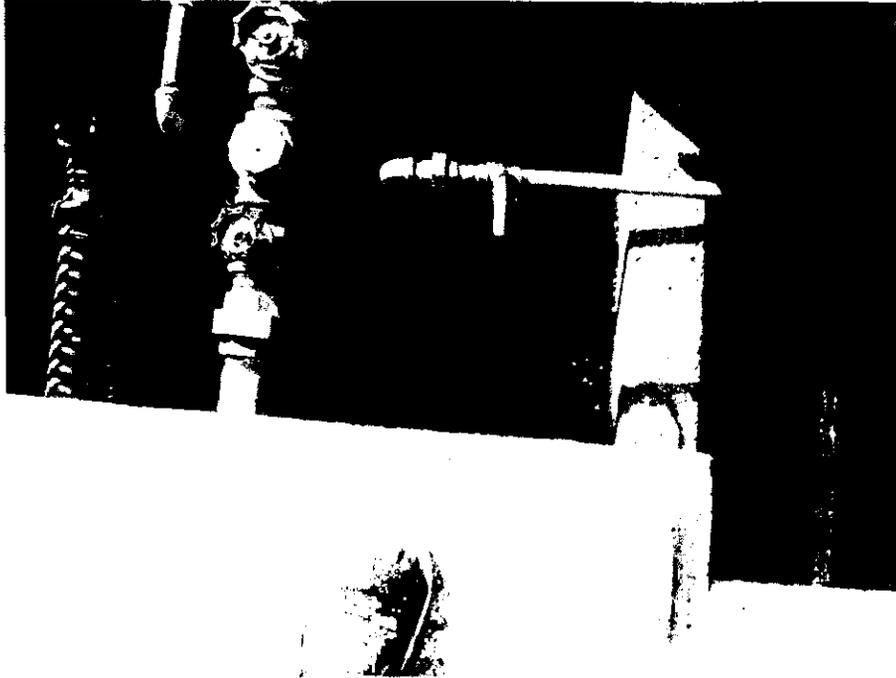
John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

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

pc: Kraig Bucklew, Holmes County Health Department

File: Semipublic/Holmes/salt Creek Twp/Weaver Leather, LLC



Clarifier with Air Lift Line and Effluent Weirs



Sand Filter with Sludge