



**Environmental
Protection Agency**

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

October 25, 2010

RE: KAUFMAN TRAILER PARK
OHIO EPA PERMIT 3PV00127
WASHINGTON TWP., HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Christine and Gary Kaufman
Kaufman Trailer Park
6963 Township Road 466
Nashville, OH 44661

Dear Ms. Kaufman and Mr. Kaufman:

On October 19, 2010, a site inspection was conducted at the above referenced facility on the east side of Township Road 466, Washington Township, Holmes County. The facility is owned by Gary and Christine Kaufman, dba Kaufman Trailer Park. The facility is operated by Kevin Dean of Dean's Backflow Service. The inspection was conducted by John Schmidt of this office, and Christine Kaufman represented Kaufman Trailer Park. 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 October 29, 2008.

The system is located in the middle of a horse pasture. The system consists of a trash trap, extended aeration system with clarifier, dosing chamber, surface sand filtration, chlorination, dechlorination, and an evaporation pond. Sludge management consists of sludge removal from the aeration system when needed to another POTW. The facility discharges to an evaporation pond which flows to an unnamed tributary to the Lake fork of the Mohican River south of the facility. No backup power is provided to the facility, however 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 6,000 gallons per day. The extended aeration plant operates on a timer, 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 an earthy 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. Electric fence posts were installed around the perimeter of the extended aeration plant, but the electrical fencing itself had been dismantled. According to Ms. Kaufman, the pasture is used for horses which have been moved from this pasture until next spring. No fencing was observed around the remaining system components. A perimeter fence must be installed around the entire wastewater treatment system.
4. The surface of the clarifier was clear. Effluent channels and weirs were in reasonable condition. The sludge return lines and skimmer were operating properly at the time of the inspection. The color of the return sludge was somewhat a lighter brown, indicating that more frequent scraping of the clarifier sides may be needed to ensure sludge is being returned.
5. The electrical control box for the sand filter dosing pump was observed as damaged (see attached pictures). Ohio EPA notes that the control box was noted in the same condition during the October 2008 survey. This must be corrected immediately. The dosing pumps discharge to the filters when enough water accumulates to pump. The pumps were tested and found operable.
6. Surface sand filters were noted as full of sludge and were flooded (see attached pictures). The sand filters must be cleaned and sludge removed. Sludge and sand cleaned out of the sand filters appears to have been dumped on the ground adjacent to the filters. This material is considered by Ohio EPA to be a solid waste and must be managed as such, which includes containerizing any removed materials until it can be disposed off-site at a licensed landfill. The energy dissipation structure for each of the sand filters is inadequate, causing erosion of the sand (see attached pictures). Ohio EPA recommends that 90° elbows be installed to aid in energy dissipation. The aeration system must be maintained in a manner to ensure no sludge carryover occurs between the clarifier and the sand filters. Any sludge and vegetation that gets to the sand filter must be promptly removed as a part of ongoing operations and maintenance.
7. The chlorination system was stocked with appropriate chemicals and operating at the time of the inspection. The tank contents were clear. No chemicals were found in the dechlorination system. The dechlorination system must be stocked with the appropriate chemicals during the disinfection season of May through October.
8. The plant discharges to an evaporation pond located south of the treatment plant, with a final discharge pipe from the pond to an unnamed tributary to the Lake Fork of the Mohican River. The discharge of the plant to the evaporation pond was observed as an acceptable visual quality. The final discharge from the evaporation pond was not observed due to a lack of flow.

9. Ohio EPA understands that Kevin Dean of Dean's Backflow Service 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 Kaufman Trailer Park WWTP operates under Permit 3PV00127*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period October 1, 2008 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	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	20.	8/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	20.	8/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.023	.4542	8/1/2009
001	00610	Nitrogen, Ammonia (NH3	7D Qty	0.034	.4542	8/1/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.17	8/1/2010
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.023	.02657	8/1/2010
001	00300	Dissolved Oxygen	1D Conc	6.0	4.86	3/5/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.61	3/11/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.32	3/16/2009
001	00300	Dissolved Oxygen	1D Conc	6.0	4.86	3/23/2009

These effluent limit violations should be explained, along with specific 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.

Reporting Violations

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

Compliance Schedule Violations

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

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Other Violations

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

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 Kaufman Trailer Park contracts with Dean's Backflow Services as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility, which is a violation of your permit. I have attached an operator of record form which must be completed and returned to Ohio EPA.

Based on the above information, you are considered to be in marginal compliance with the terms and conditions of its NPDES permit for your Kaufman Trailer Park WWTP. 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

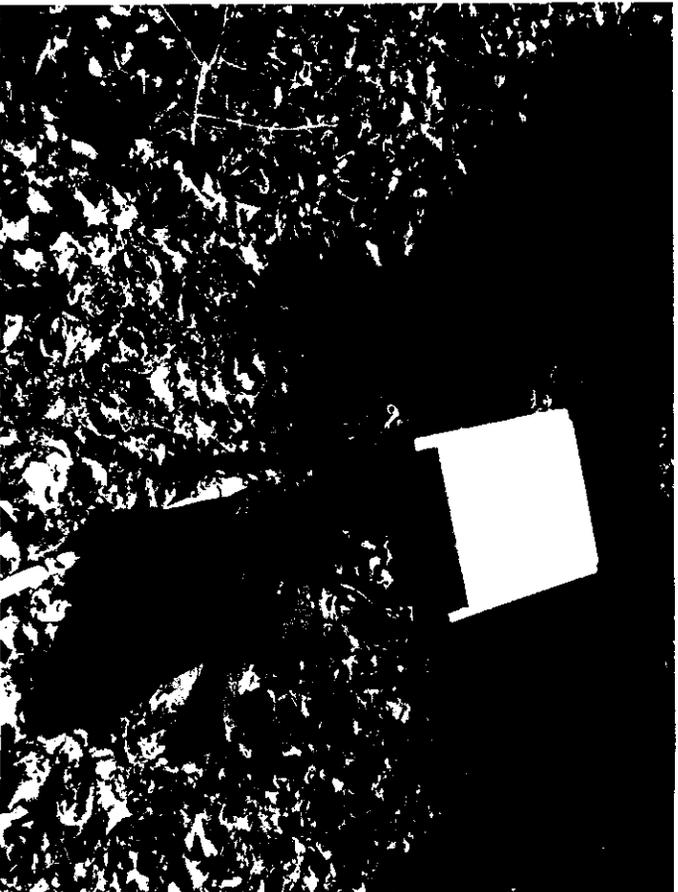
att: Operator of Record Notification Form, rev 02/2008

pc: Kraig Bucklew, Holmes County Health Department
Kevin Dean, Dean's Backflow Service

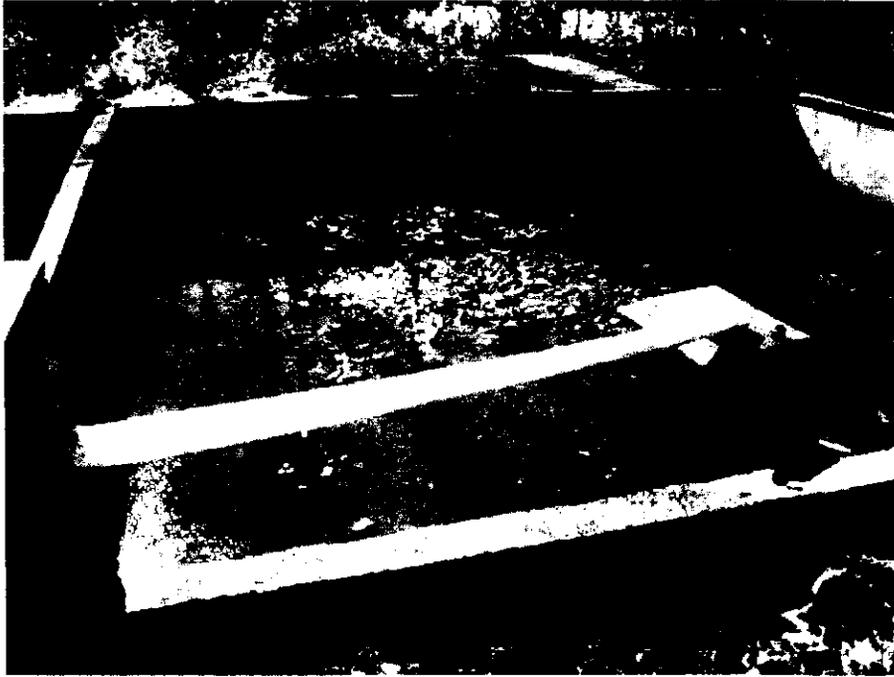
File: Semipublic/Holmes/Washington Twp/Kaufman Trailer Park



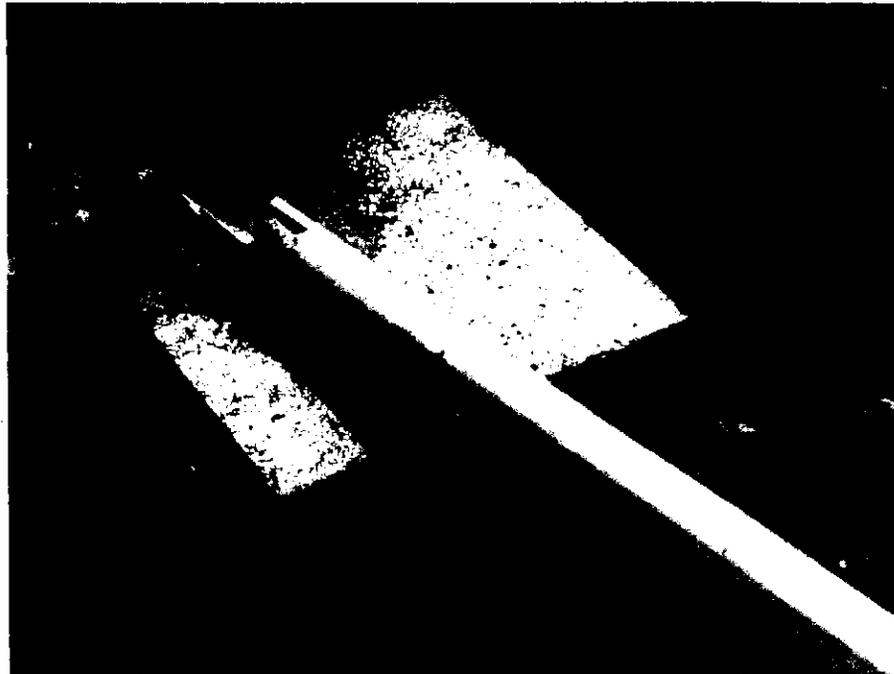
Dismantled Fencing around Aeration Tanks



Damaged Sand Filter Dosing Tank Control Box



Flooded Sand Filter with Sludge Accumulation



Sand Filter Dissipation Structure lacking a 90° Bend and Resulting Sand Erosion



Sand Filter Cleanout Dumped on Ground