



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

February 29, 2008

**Re:** Athens County  
Health Recovery Services  
NPDES Permit 0PX00010  
Compliance Inspection  
Correspondence (PWW)

Health Recovery Services, Inc.  
P.O. Box 724  
Athens, Ohio 45701

Dear Sir or Madam:

On January 24, 2008, representing Ohio EPA's Southeast District Office, I performed a compliance inspection of the wastewater treatment plant (WWTP) which serves the Health Recovery Services facility at 9908 Basset Road. Mark Rutter, representing Health Recovery Services, assisted me via a telephone call on January 25. The purpose of the inspection was to determine if Health Recovery Services is complying with the terms and conditions set forth in the NPDES Permit.

The following concerns arose during the inspection:

1. During the inspection, I observed a significant amount of solids and scum accumulated on top of the clarifiers and in the effluent of the clarifiers. The large amount of solids lost to the sand filters could cause final effluent violations from the WWTP.
2. During the inspection, I observed the sand filters overflowing onto the ground. This was likely due to the excess discharge of solids from the clarifiers. The overflowing wastewater from the sand filters constitutes a illegal plant bypass and must be reported according to Part III of the NPDES Permit. Note that reporting an illegal bypass in accordance with Part III of the NPDES Permit does not absolve you from legal liabilities and future enforcement action by the Ohio EPA. Please provide this response within 14 days upon receipt of this letter.
3. The loss of solids from the clarifiers could be attributed to a number of things including improper sludge management or intensely varying influent flow rates. In order to better understand the cause of this problem, I recommend that your operator begin keeping the following records:

- More accurate daily flow records. These values can be obtained by either installing an influent flow meter or installing elapsed time meters on the sand filter dose pumps.
- Begin performing 1 of the 4 activated sludge process control methods. These tests should be performed at least once per week, but possible more frequently if required to adequately characterize the activated sludge in the WWTP. This data will indicate the condition of the sludge in the WWTP and help the operator better manage the sludge.

I will re-inspect in the facility in the near future and examine the above records.

4. In December 2006, new Operator Certification Rules were enacted by the Ohio EPA. OAC 3745-7-09 deals with the recordkeeping requirements and responsibilities of all certified operators. All persons maintaining the WWTP must begin complying with these rules immediately. I have attached a copy of the rule to this letter.
5. The facilities current NPDES Permit requires the Total Residual Chlorine effluent concentration to be less than 0.019 mg/L. Currently, the WWTP cannot meet this limit because there is no dechlorination unit prior to discharge to remove the chlorine after the disinfection unit. In order to comply with this particular effluent limitation, Health Recovery Services should install a dechlorination unit after the chlorine disinfection unit or install a UV disinfection unit in lieu of the chlorine disinfection unit. Either of these options will require a Permit-to-Install (PTI) be issued by the Director. Information and application forms for a PTI can be found at the following link: <http://www.epa.state.oh.us/dsw/pti/index.html>.
6. The following is a table of the violations reported for this facility for the period from July 2006 to December 2007. In your response to this letter, please provide an explanation for each of the limit violations in this table.

Parameter	Limit Type	Limit	Reported Value	Violation Date
<b>July 2006:</b>				
Nitrogen, Ammonia (NH3)	30D Conc	2	3.81	7/1/2006
Nitrogen, Ammonia (NH3)	30D Qty	.02	.03605	7/1/2006
Chlorine, Total Residual	1D Conc	.019	.5	7/5/2006
Nitrogen, Ammonia (NH3)	7D Conc	3	3.81	7/8/2006
Nitrogen, Ammonia (NH3)	7D Qty	.03	.03605	7/8/2006
Chlorine, Total Residual	1D Conc	.019	.5	7/19/2006
<b>August 2006:</b>				
Fecal Coliform	30D Conc	1000	6100.	8/1/2006
Fecal Coliform	7D Conc	2000	6100.	8/1/2006
Chlorine, Total Residual	1D Conc	.019	.5	8/7/2006

Parameter	Limit Type	Limit	Reported Value	Violation Date
Chlorine, Total Residual	1D Conc	.019	.5	8/21/2006
Dissolved Oxygen	1D Conc	5	4.9	8/28/2006
<b>September 2006:</b>				
Fecal Coliform	30D Conc	1000	7000.	9/1/2006
Fecal Coliform	7D Conc	2000	7000.	9/1/2006
Chlorine, Total Residual	1D Conc	.019	.5	9/5/2006
Chlorine, Total Residual	1D Conc	.019	.5	9/29/2006
<b>October 2006:</b>				
Chlorine, Total Residual	1D Conc	.019	.5	10/3/2006
Chlorine, Total Residual	1D Conc	.019	.4	10/17/2006
Nitrogen, Ammonia (NH3)	30D Conc	2	4.07	3/1/2007
Nitrogen, Ammonia (NH3)	30D Qty	0.02	.03851	3/1/2007
<b>March 2007:</b>				
Nitrogen, Ammonia (NH3)	1D Conc	3	4.07	3/5/2007
Nitrogen, Ammonia (NH3)	1D Qty	0.03	.03851	3/5/2007
<b>May 2007:</b>				
Chlorine, Total Residual	1D Conc	0.019	.5	5/1/2007
Chlorine, Total Residual	1D Conc	0.019	.5	5/14/2007
<b>June 2007:</b>				
Chlorine, Total Residual	1D Conc	0.019	.5	6/4/2007
Chlorine, Total Residual	1D Conc	0.019	.4	6/18/2007
<b>July 2007:</b>				
Nitrogen, Ammonia (NH3)	30D Conc	2	2.67	7/1/2007
Nitrogen, Ammonia (NH3)	30D Qty	0.02	.02526	7/1/2007
Chlorine, Total Residual	1D Conc	0.019	.5	7/2/2007
Chlorine, Total Residual	1D Conc	0.019	.5	7/16/2007
<b>August 2007:</b>				
Chlorine, Total Residual	1D Conc	0.019	.5	8/1/2007
Chlorine, Total Residual	1D Conc	0.019	.5	8/20/2007
<b>September 2007:</b>				
Chlorine, Total Residual	1D Conc	0.019	.5	9/4/2007
Chlorine, Total Residual	1D Conc	0.019	.5	9/17/2007
<b>October 2007:</b>				
Chlorine, Total Residual	1D Conc	0.019	.5	10/1/2007
Chlorine, Total Residual	1D Conc	0.019	.5	10/15/2007

Enclosed is a copy of the Compliance Evaluation Inspection report. Please contact me, within fifteen (15) days of receiving this letter, to schedule a meeting to discuss the above comments. Should you have any questions, please feel free to contact me at (740) 380-5226.

Sincerely,



Patrick Hudnall  
District Engineer  
Division of Surface Water

PH/dh

Enclosure

- c: Mark Rutter, Maintenance Supervisor
- c: Jerry Smith, Buckeye Environmental

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPX00010	OH0115011	January 24, 2008	C	S	1

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Health Recovery Services Rural Women's Center 9908 Bassett Road Athens, Ohio 45701	10:00 a.m.	February 1, 2007
	Exit Time	Permit Expiration Date
	10:30 a.m.	January 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mark Rutter, Operator	(740) 594-8108
Name, Address and Title of Responsible Official	Phone Number
Health Recovery Services P.O. Box 124 Athens, Ohio 45701	(740) 594-8108

**C. AREAS EVALUATED DURING INSPECTION**

<u>  </u> S Permit	<u>  </u> U Flow Measurement	<u>  </u> N Pretreatment
<u>  </u> U Records/Reports	<u>  </u> S Laboratory	<u>  </u> N/A Compliance Schedules
<u>  </u> U Operations & Maintenance	<u>  </u> U Effluent/Receiving Waters	<u>  </u> S Self-Monitoring Program
<u>  </u> U Facility Site Review	<u>  </u> M Sludge Storage/Disposal	<u>  </u> Other
<u>  </u> N/A Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

**D. SUMMARY OF FINDINGS/COMMENTS** (attach additional sheets if necessary)

See attached inspection letter.

  
Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

3/3/08  
Date

  
Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

3/3/08  
Date