



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

June 4, 2010

Re: Athens County
Capstone Village
Reconnaissance Inspection
Permit 0PW00018*BD
Correspondence (PWW)

Mr. Bob Prebe
Capstone Village
8644 United Lane
Athens, Ohio 45701

Dear Mr. Prebe:

On February 23, 2010, Tim Campbell and I conducted a reconnaissance inspection (CEI) at the Capstone Village Apartments wastewater treatment facility. You, class A operator Robert Midkiff, and maintenance man Kent Sauber represented the facility during the plant inspection. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, federal number OH0120499, state number 0PW00018*CD. A copy of the inspection report form is attached.

Based on the inspection and file review, the facility was found to be in non-compliance with the permit on the day of the inspection, due to items listed below. However, since the inspection you have made significant improvements. The following comments/problems were noted as a result of the inspection:

1. **Operation and Maintenance** - required by Part III, Item (3) of the NPDES permit:
 - a. All four extended aeration package sewage treatment plants (STPs) were in poor condition and were not operating properly.
 - b. We recommended that you hire a new certified wastewater operator to perform an evaluation of all of the STPs and have him provide you with a list of repairs/replacement projects to get the plants running properly. On March 3, 2010, you sent me an email containing the evaluation by the new operator, Rick Verholz. Provide an update of the items that have been accomplished and if new issues have been added, and a status of when the remainder will be accomplished.

2. **Certified Operator/Operator of Record** - The NPDES permit Part II, Item A addresses new requirements contained in the Operator Certification rules, OAC 3745-07:

- a. Mr. Verholz also developed a plant operation and maintenance (O&M) schedule for the STPs. In addition to this list of O&M items, a plant log for each STP must be developed and kept on site (in the office would be acceptable). See Ohio Administrative Code Chapter 3745-7-09 (copy attached) for details on what types of information need to be recorded in the log.
- b. I have attached a copy of the Operator of Record form. Submit the original to the address on the form and a copy to me for my records. Make sure you include your class A operator, in addition to Mr. Verholz.

3. **Effluent/Receiving Waters** – Part I, A of the NPDES permit:

- a. The facility has violated effluent limits contained in the NPDES permit routinely since the NPDES permit was renewed in June of 2008.
- b. Significant improvements have occurred in the quality of the effluent discharged from the STPs since our inspection. A review of the data from March 1, 2010 to May 1, 2010 shows significantly fewer effluent violations:

Outfall	Parameter	Type*	Units	Permit Limit	Reported	Date
<i>March 2010:</i>						
001	Nitrogen, Ammonia	30D Conc	mg/L	3	19.1	3/1/2010
001	Nitrogen, Ammonia	30D Qty	Kg/day	0.17	1.09	3/1/2010
001	Nitrogen, Ammonia	1D Conc	mg/L	4.5	19.1	3/4/2010
001	Nitrogen, Ammonia	1D Qty	Kg/day	0.26	1.09	3/4/2010
<i>April 2010:</i>						
001	Nitrogen, Ammonia	30D Conc	mg/L	3	6.74	4/1/2010
001	Nitrogen, Ammonia	30D Qty	Kg/day	0.17	0.38	4/1/2010
001	Nitrogen, Ammonia	1D Conc	mg/L	4.5	6.74	4/8/2010
001	Nitrogen, Ammonia	1D Qty	Kg/day	0.26	0.38	4/8/2010

***NOTES:** 1D Conc = Daily Average Concentration Value
 1D Qty = Daily Average Loading Value
 7D Conc = Weekly Average Concentration Value
 30D Conc = Monthly Average Concentration Value
 7D Qty = Weekly Average Loading Value
 30D Qty = Monthly Average Loading Value

- c. Provide an explanation of the improvements planned to eliminate these ammonia violations.

4. **Compliance Schedules in the NPDES Permit** – Part I, C of the NPDES permit contains schedules of compliance for several items:
- a. Compliance schedule item I,C,1,c requires an operation and maintenance manual to be developed. You have complied with this item.
 - b. Compliance schedule items I,C,1,a & b require an Inflow and infiltration study to be performed and items 2,a through d require flow monitors and samplers to be installed. The Ohio EPA will continue to work with you to improve your facility's performance and will re-evaluate the need for these items by spring of 2011 to determine if they are still necessary for proper operation and maintenance of your STPs.

Please respond to comments 1b, 2a & b, and 3 d above, in writing, within 20 days of receipt of this notice. If you have any questions, please contact me at your convenience at (740) 380-5284 or by e-mail at abbot.stevenson@epa.state.oh.us.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosures

c: AS file

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PW00018*CD		February 22, 2010	R	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Capstone Village STP 8644 United Lane Athens, Ohio 45701	1:00 p.m.	August 1, 2008
	Exit Time	Permit Expiration Date
	2:30 p.m.	July 31, 2013

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Bob Prebe, Manager Robert Midkiff, Operator Kent Sauber, Maintenance	(740) 592-2177
Name, Address, & Title of Responsible Official	Phone Number
Bob Prebe, Property Manager Capstone Village STP 8644 United Lane Athens, Ohio 45701	(740) 592-2177

C. AREAS EVALUATED DURING INSPECTION

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

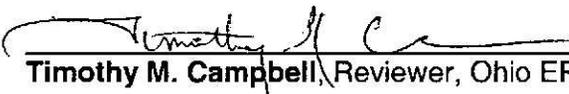
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

1. Records - see attached letter Item 2.
2. Operations/Maintenance - See attached letter Item 1b.
3. Effluent - see attached letter Item 3c.
4. Compliance Schedule - see attached letter Item 4.


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

4/3/10
Date


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

4/3/10
Date

Recordkeeping requirements and responsibilities of a certified operator.

- (A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment works, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.
- (1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.
 - (2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.
 - (3) At a minimum, the following information shall be recorded:
 - (a) Identification of the public water system, sewerage system, or treatment works;
 - (b) *Date and times of arrival and departure for the operator of record and any other operator required by this chapter;*
 - (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;
 - (d) Results of tests performed and samples taken, unless documented on a laboratory sheet;
 - (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and
 - (f) Identification of the persons making entries.
 - (4) The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.

(B) A certified operator shall:

- (1) Perform their duties in a responsible and professional manner consistent with standard operating procedures and best management practices;
- (2) Operate and maintain public water systems, sewerage systems, treatment works, and appurtenances so as not to endanger the health or safety of persons working in or around the facility, the public at large, or the environment due to negligence or incompetence; and
- (3) Report all instances of noncompliance with applicable regulations to the operator of record or facility supervisor.

(C) The duties of an operator of record shall include, but not be limited to, those outlined in paragraphs (B)(1) to (B)(3) of this rule and the following additional duties and responsibilities:

- (1) Responsible and effective on site management and supervision of the technical operation of the public water system, treatment works, or sewerage system;
- (2) Immediately notifying the permittee or owner of a public water system, sewerage system, or treatment works, and ensuring the agency and, if applicable, the local regulatory agency, is notified of items that require notification in accordance with sections 6109. or 6111. of the Revised Code, the rules adopted thereunder, or the facility's NPDES permit; and

(D) In the event that there are issues related to paragraphs (A) to (C) of this rule that are within the area of responsibility of, but beyond an operator of record or a certified operator's ability to address, it shall be the operator's responsibility to document any efforts to rectify the problem.

Effective: 12/21/2006

R.C. 119.032 review dates: 12/21/2011

Promulgated Under: 119.03

Statutory Authority: RC Sections 6111.46, 6109.04

Rule Amplifies: RC Sections 6111.46, 6109.04



Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit

Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency
 Division of Drinking and Ground Waters
 Operator Certification Unit
 50 West Town St, Suite 700
 P.O. Box 1049
 Columbus, OH 43216-1049

Phone: (614) 644-2752
 1- 866 - 411-OPCT (6728)
 Fax: (614) 644-2909
 email: opcert@epa.state.oh.us
 website: www.epa.state.oh.us/ddagw/opcert.html

I. SYSTEM INFORMATION

Name of System: _____ Phone Number: _____

PWS ID/NPDES Permit #: _____ STU # _____ Classification: _____

Name of Facility Owner or Permittee, Title (Print) _____ Facility Owner or Permittee (Signature) _____

II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

* A signature by an operator of record who is being removed is not required.
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: _____

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	

**NPDES
Compliance Inspection Report**

CORRECTED

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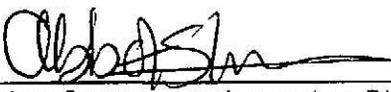
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