



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

March 28, 2008

Re: Athens County
Health Recovery Services
NPDES Permit 0PX00010 & 0PX00008
Compliance Inspection
Correspondence (PWW)

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

Dear Sir or Madam:

On March 20, 2008, Tim Campbell and I, representing Ohio EPA's Southeast District Office, performed a compliance inspection of the wastewater treatment plants (WWTPs) serving the Rural Women's facility at 9908 Bassett Road and the Bassett House facility at 10050 Bassett Road. Rich Green and Mark Rutter, representing Health Recovery Services (HRS), assisted us during the inspection. The purpose of the inspection was to follow-up with my January 24, 2008 inspections, and determine if Health Recovery Services is complying with the terms and conditions set forth in the two NPDES Permits.

The following concerns arose during the inspection:

Both Facilities:

1. At the time of the inspection, the sand filters had been dewatered; however, a significant layer of solids still remained on top of the sand. Mr. Rutter was unsure how to best remove the remaining solids and spent filter sand. We recommended a company such as MPW with larger vacuum trucks capable of removing the solids and spent sand.
2. It appeared that the level of sand in the sand filters was getting below the optimal level; we recommend that once the remaining solids and spent sand have been removed, HRS purchase new sand for the sand filters to ensure that they operate properly.
3. As stated in my Jan. 24, 2008 inspection letter, HRS needs to install elapsed time meters on the sand filter dosing pumps to better monitor plant operations. In your response to this letter, please include a proposed time frame for the installation of the meters.

4. At the time of the inspection, the solids appeared to be settling very well in the clarifiers; however, the sludge blanket appeared to be very high in the clarifiers. The high sludge blanket should be managed by wasting sludge from the clarifiers back to the aeration basins. When the sludge blanket is too high, solids can easily wash out onto the sand filters if the flow is increased. When examined, the Return Activated Sludge (RAS), or the sludge wasted from the clarifiers back to the aeration basin, was flowing well but not very thick, which indicated that the return line was not taking in enough sludge. To keep the solids moving towards the return line and the sludge blanket lower, the operator should scrape the clarifier walls down towards the bottom of the tank on a regular basis. When asked, Mr. Rutter stated that the scraper he used for the Rural Women's WWTP was broken and the one for the Bassett House WWTP was not long enough. He had called to order new scrapers before we left and we informed him that this should become a daily exercise.
5. As stated in my Jan 24, 2008 inspection letter, the operator needed to begin performing one of the process control tests at least weekly to manage the solids and operate the plants more efficiently. At the time of the inspection, Mr. Rutter stated that he had performed one test since the last letter. By performing these tests, the operator can monitor and manipulate the conditions in the plant for optimal operation. If these tests are not performed the operator is merely reacting to changes in plant operation.
6. As stated in my January 24, 2008 inspection letters, both of the facilities current NPDES Permits require the Total Residual Chlorine effluent concentration to be less than 0.019 mg/L. Currently, the WWTPs cannot meet this limit because there are no dechlorination units prior to the discharges 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>. We expressed the need for this system to be installed as soon as possible to Mr. Rutter and Mr. Green, as the disinfection season begins May 1st and the lack of a dechlorination unit will result in more effluent violations. In your response to this letter, please include a proposed time frame for the PTI submittal and installation of the dechlorination units for both facilities.

As the deadline for the installation of dechlorination facilities, contained in the Compliance Schedule of previous permit, has not been met, the NPDES Permit renewal may be issued with Director's Final Findings and Orders (DFFOs). If issued, the DFFOs would contain a civil penalty for noncompliance with the NPDES Permit.

Bassett House:

7. During the inspection, Mr. Rutter stated that the Flow Equalization Tank effluent flow splitting apparatus did not seem to work well and clogged very easily. We recommended that Mr. Rutter install a flow splitting apparatus similar to the one at the Rural Women's facility.
8. The metal grates over some of the tanks were severely corroded and posed a serious risk to workers. The deteriorated grates should be replaced with corrosion resistant grates to ensure a safe working environment.

As discussed with Mr. Green, each of the referenced facilities is covered under a separate NPDES Permit. Currently, the Bassett House WWTP NPDES Permit is up for renewal. To make tracking simpler for both Ohio EPA and HRS, and to save HRS some money, I would like to combine the two facilities under one NPDES Permit. This could be done by simply changing the current Bassett House Permit renewal application and subsequent permit to reflect two outfalls instead of one. One outfall would correspond to Rural Women's and the other to Bassett House. I have enclosed the NPDES Permit renewal application for the Bassett House facility and the last NPDES Permit renewal application for the Rural Women's facility for reference. Also, updated versions of the NPDES Applications can be found at the following link: <http://www.epa.state.oh.us/dsw/permits/npdesform.html>. You will need to complete Forms 1, 2E, 2S and the Antidegradation Addendum.

Enclosed is a copy of the Compliance Evaluation Inspection report. Please respond to the comments listed above, in writing, within thirty (30) days of receiving this letter. 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, Operator
- c: Jerry Smith, Buckeye Environmental
- c: Rich Green

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PX00008	OH0107841	March 20, 2008	C	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Health Recovery Services, Bassett House 154 A Bassett Road Athens, Ohio 45701	11:45 a.m.	April 1, 2003
	Exit Time	Permit Expiration Date
	12:30 p.m.	March 31, 2008

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

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> U Compliance Schedules
<u> </u> U Operations & Maintenance	<u> </u> M 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)

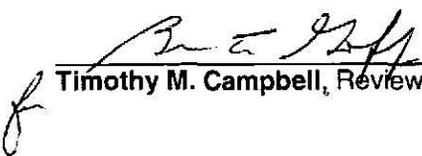
See attached inspection letter.



 Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

 3/28/08

 Date



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

 3/28/08

 Date