



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

April 8, 2009

**Re: Coshocton County
Echoing Hills Village
Notice of Violation
Correspondence (PWW)**

Mr. Michael Morrow, Maintenance Director
Echoing Hills Village
36272 CR 79
Warsaw, Ohio 43844

Dear Mr. Morrow:

Based on review of records since September 1, 2008, Echoing Hills Village was found to have reported the following limit violations with respect to compliance with National Pollutant Discharge Elimination System (NPDES) permit 0PR00154*AD:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2008	001	Dissolved Oxygen	1D Conc	5.0	1.13	9/5/2008
September 2008	001	Dissolved Oxygen	1D Conc	5.0	1.16	9/19/2008
September 2008	001	Dissolved Oxygen	1D Conc	5.0	3.91	9/26/2008
October 2008	001	Total Suspended Solids	30D Conc	12	168.	10/1/2008
October 2008	001	Fecal Coliform	30D Conc	1000	7700.	10/1/2008
October 2008	001	CBOD 5 day	30D Conc	10	145.	10/1/2008
October 2008	001	CBOD 5 day	30D Qty	0.38	.38418	10/1/2008
October 2008	001	Dissolved Oxygen	1D Conc	5.0	1.1	10/3/2008
October 2008	001	Dissolved Oxygen	1D Conc	5.0	2.99	10/10/2008
October 2008	001	Dissolved Oxygen	1D Conc	5.0	1.03	10/17/2008
October 2008	001	Total Suspended Solids	1D Conc	18	168.	10/27/2008
October 2008	001	Fecal Coliform	1D Conc	2000	7700.	10/27/2008
October 2008	001	CBOD 5 day	1D Conc	15	145.	10/27/2008
October 2008	001	Dissolved Oxygen	1D Conc	5.0	3.79	10/27/2008
December 2008	001	Total Suspended Solids	30D Conc	12	67.	12/1/2008
December 2008	001	Total Suspended Solids	30D Qty	0.45	1.24997	12/1/2008
December 2008	001	CBOD 5 day	30D Conc	10	51.	12/1/2008
December 2008	001	CBOD 5 day	30D Qty	0.38	.95147	12/1/2008
December 2008	001	Dissolved Oxygen	1D Conc	5.0	1.65	12/5/2008
December 2008	001	Dissolved Oxygen	1D Conc	5.0	1.37	12/8/2008
December 2008	001	Dissolved Oxygen	1D Conc	5.0	1.99	12/16/2008
December 2008	001	Total Suspended Solids	1D Conc	18	67.	12/22/2008

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2008	001	Total Suspended Solids	1D Qty	0.68	1.24997	12/22/2008
December 2008	001	CBOD 5 day	1D Conc	15	51.	12/22/2008
December 2008	001	CBOD 5 day	1D Qty	0.57	.95147	12/22/2008
December 2008	001	Dissolved Oxygen	1D Conc	5.0	1.9	12/22/2008
January 2009	001	Total Suspended Solids	30D Conc	12	114.	1/1/2009
January 2009	001	Total Suspended Solids	30D Qty	0.45	1.76652	1/1/2009
January 2009	001	CBOD 5 day	30D Conc	10	69.	1/1/2009
January 2009	001	CBOD 5 day	30D Qty	0.38	1.06921	1/1/2009
January 2009	001	Total Suspended Solids	1D Conc	18	114.	1/5/2009
January 2009	001	Total Suspended Solids	1D Qty	0.68	1.76652	1/5/2009
January 2009	001	CBOD 5 day	1D Conc	15	69.	1/5/2009
January 2009	001	CBOD 5 day	1D Qty	0.57	1.06921	1/5/2009
February 2009	001	Total Suspended Solids	30D Conc	12	135.	2/1/2009
February 2009	001	Total Suspended Solids	30D Qty	0.45	3.78122	2/1/2009
February 2009	001	CBOD 5 day	30D Conc	10	142.	2/1/2009
February 2009	001	CBOD 5 day	30D Qty	0.38	3.97728	2/1/2009
February 2009	001	Total Suspended Solids	1D Conc	18	135.	2/10/2009
February 2009	001	Total Suspended Solids	1D Qty	0.68	3.78122	2/10/2009
February 2009	001	CBOD 5 day	1D Conc	15	142.	2/10/2009
February 2009	001	CBOD 5 day	1D Qty	0.57	3.97728	2/10/2009
February 2009	001	Dissolved Oxygen	1D Conc	5.0	4.86	2/10/2009
February 2009	001	Dissolved Oxygen	1D Conc	5.0	4.19	2/17/2009
February 2009	001	Dissolved Oxygen	1D Conc	5.0	3.88	2/24/2009

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Permit OPR00154*AD requires the Owner to report noncompliance as directed by Part III.12.E of the permit which shall contain information listed in Part III.12.B and Part III.12.C.

I have been informed that the clarifier had a concrete wall collapse, and that wall was going to be replaced with alternative materials to prevent short circuiting months ago. In your response to this Notice of Violation letter, please address the status of the replacement of the collapsed wall. In a review of submitted data, it appears that flow monitoring has improved or at least the frequency of measuring flow has increased. Please describe what has been done to address flow monitoring.

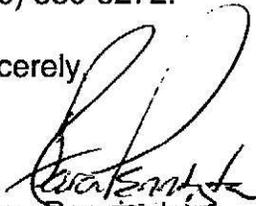
The average CBOD₅ for your outfall was reported at 100mg/L, TSS at 120mg/L, and D.O. at 4.0 mg/L. Compare that to limits of CBOD₅ at 10mg, TSS at 12mg/L, and DO at minimum 5.0mg/L and it straightforward indicates this plant is not in compliance. The application for the permit included lab results which tested the effluent at 9mg/L TSS, 4mg/L CBOD₅, and a Fecal Coliform count of 12cfu/100ml. The Fecal Coliform testing in October was reported at 7700cfu/100ml which is in exceedence of the permitted max day fecal concentration of 2000cfu/100ml. The discharge concentration reflects 50%

removal (if normal strength wastewater is assumed) which wouldn't even achieve secondary treatment limits of 85% removal. This wastewater treatment plant needs quick attention. Please include in your response letter, the location at which the effluent sample was collected. It appears the sand filters are not effective and/or bypassing which would require additional needs. The facility will most likely require some financial need which should be accounted for in budgeting.

Please inform this office, in writing, within fourteen days of receipt of this notification as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

If you have any questions/clarifications or need additional time, please contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AMP/dh