



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

July 15, 2010

Re: Tuscarawas County
S & N Pallets, Inc.
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Miklos Fioretto, CEO
S & N Pallets, Inc.
P.O. Box 245
Sandyville, Ohio 44671

Dear Mr. Fioretto:

On April 27, 2010, I inspected the wastewater treatment plant serving S & N Pallets, Inc. The purpose of my inspection was to determine compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit No. 01N00249*AD and to prepare for and complete your permit renewal process. My inspection findings are summarized below.

At the time of my inspection, the plant was operating poorly. The final effluent was visually clear, however, there was algae growth in the roadside ditch. Part III, Item 2E of your permit states "The effluent shall, at all times, be free of substances in amounts that are conducive to the growth of aquatic weeds or algae to the extent that such growths become inimical to more desirable forms of aquatic life, or create conditions that are unsightly, or constitute a nuisance in any other fashion."

At the time of my inspection, the aeration tank was light brown to gray in color. Aeration and roll were good. During the inspection, the clarifier looked like the aeration tank. There was sludge and solids on the surface of the clarifier, you could see the flock moving around as if the clarifier was being aerated slightly and the return activated sludge line was running clear. In addition, the surface skimmer in the clarifier was running clear. Please be aware the clarifier should never be aerated, since this tank is used to settle out solids that have been digested in the aeration tank. In addition, the surface skimmer should be adjusted so that the sludge and solids can be returned to the aeration tank.

The sides of the clarifier must be gently scraped all around the hopper with a slow, easy downward motion, just enough to help move the sludge towards the bottom of the hopper. This procedure should be done at least once per week. This procedure will help move the sludge to the bottom of the clarifier hopper to be returned to the aeration tanks.

During the inspection, the tertiary sand filters were not in operation. In addition, the sand filters were full of weeds and construction debris. It will be necessary to remove the sand and construction debris which is co-mingled in the sand filters and replace the sand. Prior to replacing the sand, the under drains should be inspected by a certified operator/contractor to determine the integrity of the drains. A copy of the inspection report should be submitted to Ohio EPA for review.

Since the sand filters did not appear to be in use, I could not determine if the dosing pumps were operational. Please be aware, Part III, Item 3A of the permit states "At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..." The dosing pumps should be equipped with elapsed time meters for estimating the flow rates at outfall 001. Please provide documentation that the dosing pumps are equipped with elapsed time meters.

At the time of my inspection, the UV disinfection system was out of service. The final effluent is required to be disinfected May 1 until October 31 each year. If you have not placed the UV disinfection unit in service, it will need to be done immediately. The concrete on the aeration tanks and clarifier is beginning to deteriorate. In addition, there were holes in the bricks and some of the bricks were actually missing in the surface sand filter walls. Please be reminded, Part III, Item 3A of the permit states "At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit..."

During my inspection, I discussed the possibility of connecting to the sanitary sewer serving Sandyville or East Sparta. Upon investigation, I have found there are two different sewer systems located near your facility. It appears the nearest point of connection is approximately 1000 feet or more. I understand from Tuscarawas County Metropolitan Sewer District and Stark County Sewer District that there are no plans to extend the sewer line in front of your property. It will be necessary to properly operate and maintain the wastewater treatment plant serving your facility unless you chose to connect to the sanitary sewer.

Part II, Item I of your expired permit and Part II, Item K of your renewed permit requires that annual sludge reports be submitted no later than January 31 of each calendar year. Ohio EPA has not received an annual sludge report since January 31, 2006. We will expect these reports to be submitted without further delay.

Your permit expired on March 31, 2010. Ohio EPA received your renewal application on October 1, 2009. Your permit was public noticed and the comment period ended on March 5, 2010. During the inspection, I was informed there were no concerns with the new permit. Your new permit will be issued final and should become effective on August 1, 2010.

Part II, Item 2 of your renewal permit and Ohio Administrative Code 3745-7 requires your wastewater treatment plant be under the supervision of a Class A operator. Currently there is no certified Class A operator. It will be necessary to hire someone with a Class A or higher license until someone at the facility can obtain a Class A license. At this time, Ohio EPA does not plan to provide a Class A wastewater course in the Fall of 2010. The course that was provided in May 2010 was videotaped. Ohio EPA hopes to have this training course available to the operators on the Ohio EPA website and in DVD format prior to the November exams.

A review of your file reveals Discharge Monitoring Reports (DMR's) were not submitted from February 2008 through February 2010 until March 2010. Please be aware, Part III, Item 4.C. states "DMR's submitted using e-DMR shall be submitted to Ohio EPA by the 20th day of the month following the month of interest." In addition, please be aware that Part III, Item 4.D. states "Regardless of the submission method, a paper copy of the submitted Ohio EPA 4500 DMR shall be maintained onsite for records retention purposes..." Parameters in your final effluent must be sampled in accordance with your NPDES permit. Numerous parameters since February 2008 have not been sampled in accordance with your permit. Please inform this office if pH and dissolved oxygen testing are conducted on-site or are taken to your laboratory for analysis. A review of laboratory sheets from Ream and Haager Laboratory, Inc. do not include analytical results for dissolved oxygen and pH. Please be aware that dissolved oxygen and pH testing is to be done immediately at the site. Please provide documentation that you have a dissolved oxygen and a pH meter or provide a letter from your laboratory stating that they have a portable unit to test on-site.

The facility was in non-compliance with the NPDES permit during the inspection. A copy of our completed inspection report is enclosed. Please submit a written response to the aforementioned comments within 30 days of receipt of this letter along with a schedule to address the problems with the wastewater treatment plant. The assistance and cooperation received during the inspection was appreciated.

If you have any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte
Chemical Engineer – Environmental Specialist II
Division of Surface Water

JMW/dh

Enclosure

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01N00249*AD	OH0128121	April 27, 2010	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
S & N Pallets, Inc. 10465 Sandyville Avenue East Sparta, Ohio 44626	10:30 a.m.	April 1, 2005
	Exit Time	Permit Expiration Date
	11:00 a.m.	March 31, 2010

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Lori Watson, Office Manager	(330) 866-1008
Name, Address, & Title of Responsible Official	Phone Number
Miklos Fioretto, CEO P.O. Box 245 Sandyville, Ohio 44671	(330) 866-1008

C. AREAS EVALUATED DURING INSPECTION

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

See attached letter.

Jennifer M. Witte
Jennifer M. Witte, Inspector, Ohio EPA, Southeast District Office

7/15/10
Date

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

7/15/10
Date