



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

March 23, 2012

Scott Hanhart, Partner  
Darby Creek Golf Course  
19300 Orchard Road  
Marysville, OH 43040

Re: **Darby Creek Golf Course**  
**NPDES Permit 4PX00017/ OH0113646**  
**Compliance Evaluation Inspection**  
**Union County**  
**Notice of Violation**

Dear Mr. Hanhart:

On March 7, 2012, a Compliance Evaluation Inspection was conducted at the Darby Creek Golf Course. Present for the inspection were Pat Hickman, the Operator of Record, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

**Findings:**

1. Attached is compliance data between October 1, 2011, and February 1, 2012. This information includes only one sample because the permit requires quarterly sampling. I reviewed compliance since December 1, 2007, and since the phosphorous limit was imposed on September 1, 2009, the limit has been exceeded 8 times out of the 9 samples. As a result, **this letter serves as a Notice of Violation. Please provide this office with a schedule of how Darby Creek Golf Course will abate the violations.**
2. A table of flow rates is also attached. Mr. Hickman indicated that flows are calculated using the hour meters on the dosing tank. The average flow of 489 GPD is much lower than the proposed flow of 7,600 GPD. Mr. Hickman asked if a land application system could be used. You can find more information at the link below. An on-site septic system or mound system might also be possible abatement strategies.

[http://www.epa.ohio.gov/portals/35/rules/42-13\\_factsheet\\_feb08.pdf](http://www.epa.ohio.gov/portals/35/rules/42-13_factsheet_feb08.pdf)

3. The NPDES permit required a marker to be in place by January 1, 2010. The facility does not have a marker in place. **Please install the marker and provide pictures of it by May 1, 2012.**

Attached is the Compliance Evaluation Inspection checklist. **A response is requested by May 1, 2012.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at [cole.miller@epa.ohio.gov](mailto:cole.miller@epa.ohio.gov).

Sincerely,



Cole Miller  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

c: File Copy

ec: Cole Miller

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PX00017	OH0113646	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
3/7/2012	1:45 PM	2:20 PM	Yes	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Darby Creek Golf Course 19300 Orchard Road Marysville, OH 43040	9/1/2009
	Permit Expiration Date
	8/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Pat Hickman, Operator of Record	(614) 578-6203
Name and Title of Responsible Official	Phone Number
Scott Hanhart, Partner	(800) 343-2729

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
M	NPDES Compliance	Habitually exceeds phosphorous limit.
S	Operations & Maintenance	
M	Facility Site Review	No marker is in place at the outfall.
S	Collection System	
S	Flow Measurement	
N	Receiving Waters	
N	Laboratory	

Comments:

Signatures	
 3/16/12	 3/16/12
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

## Compliance Data for Darby Creek Golf Course between 10/1/2011 to 2/1/2012

### Summary

Permit Effluent Limit Violations: 1

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2011	001	Phosphorus, Total (P)	30D Conc	1.0	4.3	12/1/2011

Flow Data for Darby Creek Golf Course between 10/1/2011 and 2/1/2012

	Date	Flows (GPD)
Ten Highest Flows	10/7/2011	945
	10/9/2011	945
	10/15/2011	945
	10/16/2011	945
	10/23/2011	945
	1/20/2012	650
	1/27/2012	650
	10/2/2011	630
	10/3/2011	630
	10/8/2011	630
<b>Average Flow Rate</b>		489

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Products and production rates conform with permit application ..... Y
- (d) Flows and loadings conform with NPDES permit ..... Y
- (e) Treatment processes are as described in permit application ..... Y
- (f) New treatment process added since last inspection ..... N
- (g) Notification given to State of new, different or increased discharges ..... Y
- (h) All discharges are permitted ..... Y
- (i) Number and location of discharge points are as described in permit ..... Y

Comments:

**SECTION E: COMPLIANCE**

- (a) Any significant violations since the last inspection ..... Y
- (b) Permittee is taking actions to resolve violations ..... N
- (c) Permittee has a compliance schedule ..... N
- (d) Permittee is meeting compliance schedule ..... N/A

Comments:

**SECTION F: OPERATION AND MAINTENANCE**

- (a) Standby power available ..... N/E  
If yes, what type?
- (b) Adequate alarm system available for power or equipment failures ..... Y
- (c) All treatment units in service other than backup units ..... Y
- (d) Wastewater Treatment Works classification ..... A
- (e) Operator of Record holds unexpired license of class required by Permit ..... Y  
Class held: III
- (f) Copy of certificate of Operator of Record displayed on-site ..... N/E
- (g) Minimum operator staffing requirements fulfilled ..... Y
- (h) Routine and preventative maintenance scheduled and performed ..... Y
- (i) Any major equipment breakdown since last inspection ..... N
- (j) Operation and maintenance manual provided and maintained ..... N/E
- (k) Any plant bypasses since last inspection ..... N
- (l) Regulatory agency notified of bypasses ..... N/A  
By MOR  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection ..... N/A

Comments:

**SECTION G: RECORD KEEPING**

- a) Log book provided ..... Y
- b) Format of log book (i.e. computer log, hard bound book)  
Hard Bound
- c) Log book(s) kept onsite in an area protected from weather..... Y
- d) Log book contains the following:
  - i) Identification of treatment works ..... Y
  - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 ..... Y
  - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) ..... Y
  - iv) Laboratory results (unless documented on bench sheets) ..... Y
  - v) Identification of person making log entries ..... Y
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred?... Y

Comments:

**SECTION H: COLLECTION SYSTEM**

- a) Percent combined system: ..... 0
- b) Any collection system overflows since last inspection ..... N/A  
CSO  SSO
- c) Regulatory agency notified of overflows ..... N/A
- d) CSO O&M plan provided and implemented..... N/A
- e) CSOs monitored and reported in accordance with permit ..... N/A
- f) Portable pumps are used to relieve system..... N
- g) Lift station alarms provided and maintained ..... N/A
- h) Lift stations equipped with permanent standby power or equivalent ..... N/A
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N
- j) Any complaints received since last inspection of basement flooding ..... N
- k) Are any portions of the sewer system at or near capacity ..... N
- l) Are operations changed during high-flow events?..... N

Comments:

**SECTION I: SLUDGE MANAGEMENT**

- a) Sludge management plan (SMP) last audited by Ohio EPA:..... N/A  
Audit Date:
- b) Sludge adequately disposed ..... N/A  
Method: Facility is under loaded and does not waste
- c) If sludge is incinerated, where is ash disposed of ..... N/A
- d) Is sludge disposal contracted ..... N/A  
Name:
- e) Has amount of sludge generated changed significantly ..... N/A
- f) Adequate sludge storage provided at plant ..... N/A
- g) Records kept in accordance with State and Federal law ..... N/A
- h) Any complaints received last year regarding sludge ..... N/A
- i) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments:

**SECTION J: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained ..... Y  
Type of device: Hour Meter                      Device location: Dosing tank
- b) Calibration frequency adequate.....  
Date of last calibration: Draw down performed July 2011
- c) Secondary instruments operated and maintained ..... N/A
- d) Flow measurements equipment adequate to handle full range of flows .... Y
- e) Actual flow discharged is measured ..... Y
- f) Flow measuring equipment inspection frequency ..... N/A
- g) Sampling location(s) are as specified by permit ..... Y
- h) Parameters and sampling frequency agree with permit..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) ..... Y

Comments:

**SECTION K: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... N/E
- b) If alternate procedures are used, are they properly approved? ..... N/E
- c) Analysis performed more frequency ..... N  
     If yes, are results recorded in permittee's report? ..... N/A
- d) Commercial laboratory used: Yes  
     Name: MASI  
     Parameters analyzed:
- e) Quality assurance manual provided and maintained ..... N/E
- f) Calibration and maintenance of instruments is satisfactory? ..... N/E
- g) Results of last U.S. EPA quality assurance ..... N/E  
     Date:

Comments:

**SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS**

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other

Comments: The plant does not regularly discharge and the dosing tank did not activate while I was there. Therefore, the outfall was not observed.

**SECTION M- MULTIMEDIA OBSERVATIONS**

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- b) Do you notice staining or discoloration of soils, pavement or floors ..... N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- e) Do you notice any unusual odors or strong chemical smells..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: