



**Environmental
Protection Agency**

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

April 25, 2012

Re: Athens County
Heatherstone Village
(formerly Parklane MHP)
Compliance Evaluation Inspection
Ohio EPA Permit OGV00027*AD
NPDES Permit OHG00056
Correspondence (PWW)

Mr. Robert Prebe, Manager
Heatherstone Village, Ltd.
P.O. Box 186
Athens, Ohio 45701

Dear Mr. Prebe:

On March 22, 2012, Jennifer Witte and I conducted a compliance evaluation inspection at the Heatherstone Village mobile home park (formerly Parklane MHP) sewage treatment plant (STP). No one represented the facility during the inspection. The purpose of the inspection was to determine the facility's status of compliance with the terms and conditions set forth in its National Pollutant Discharge Elimination System (NPDES) Permit, OGV00027*AD and Permit to Install (PTI) 820948. A copy of the inspection form is enclosed.

As a result of the inspection and file review, I have the following comments:

1. **Ohio Administrative Code Chapter 3745-33-03 - NPDES Permit Status:** Any permittee who wishes to continue to discharge after the expiration date of his Ohio NPDES permit must file for reissuance of the permit at least one hundred eighty days prior to its expiration.

This facility has a general permit for "Small Sanitary Dischargers That Cannot Meet BADCT Standards", because at the time of issuance it did not have dechlorination facilities. The permit has since been transferred to Heatherstone. The general permit included a compliance schedule with a deadline to install dechlorination facilities. Once dechlorination is installed, you must apply for General Permit for Small Sanitary Dischargers, OHS000003, by submitting a Notice of Intent (NOI), no later than June 1, 2012. Once you are covered under the new general permit, coverage under the expired general permit will be terminated.

2. **NPDES Permit Part III, 3 – Schedule of Compliance:** Your NPDES permit contains a schedule of compliance for installation of dechlorination facilities.

Heatherstone obtained PTI approval on September 21, 2011 for installation of dechlorination facilities. It did not appear from the inspection that dechlorination has yet been installed. You are required to complete construction and to comply with the final effluent limits as soon as possible, but no later than May 1, 2012.

3. **NPDES Permit Part III, Item 3 – Facility Operation and Quality Control:** All wastewater treatment works shall be operated in a manner consistent with the following: 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.

The sewer system suffers from excessive inflow and infiltration (I/I). On August 10, 2011, you informed Ohio EPA that leaking manholes were discovered, which would be replaced and that the sewers were being scheduled to be televised. Provide an update on the status of this work, and provide a list of repairs made or to be made and the dates by which the repairs will be accomplished.

4. **NPDES Permit Part I, A – Monitoring Requirements:** The permittee failed to comply with the monitoring requirements contained in the NPDES permit. Specific instances include failure to perform annual monitoring in September 2011.

Provide an explanation for the above referenced violation. Also, submit the data within 30 days of receipt of this report.

Please reply, in writing, to items 1 through 4 above, within 30 days of receipt of this report. If you have any questions or comments, please contact me at (740) 380-5284.

Sincerely,



Abbot Stevenson
Environmental Engineer
Permits and Compliance Section
Division of Surface Water

AS/dh

Enclosure

c: Mike Cooper, Athens County Health Department
c: Rick Verhotz, Stantec Consulting

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0GV00027*AG	OHG00056	March 22, 2012	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Heatherstone Village, formerly Parklane Mobile Home Park Heatherstone Drive Athens, Ohio	3:15 p.m.	
	Exit Time	Permit Expiration Date
	3:30 p.m.	August 1, 2008

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Name, Address, & Title of Responsible Official	Phone Number
Bob Prebe, Manager Heatherstone Village P.O. Box 186 Athens, Ohio 45701	(740) 592-2177

C. AREAS EVALUATED DURING INSPECTION

<u>U</u> Permit	<u>N</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>N</u> Records/Reports	<u>N</u> Laboratory	<u>U</u> Compliance Schedules
<u>U</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>U</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N</u> Sludge Storage/Disposal	<u> </u> Other
<u>U</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. Permit: See letter Item 1
2. Operations and Maintenance/Collection System: See letter Item 3
3. Self Monitoring: See letter Item 4
4. Compliance Schedules: See letter Item 2


 Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

4/24/12
 Date


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

4/24/12
 Date