



Environmental
Protection Agency

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

May 1, 2012

Re: Athens County
Knollwood MHP
Reconnaissance Inspection
NPDES Permit OPV00007*FD
Correspondence (PWW)

Mr. Raymond Croxford
dba Knollwood MHP
7343 Cameron Road
Athens, Ohio 45701

Dear Mr. Croxford:

On March 21, 2012, Jennifer Witte and I conducted a reconnaissance inspection at the Knollwood MHP wastewater treatment plant. The purpose of the inspection was to determine the operational condition of the plant. Access was limited as the fence was locked. No one represented the facility during the inspection.

The plant is in very poor condition and the following items need to be addressed as required by Part III of the NPDES permit:

1. **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.
 - a. The sand filters continue to be neglected. The walls are falling apart and need to be rebuilt.
 - b. The grating over the tanks has been removed. It is my understanding it was stolen. It is necessary for safety purposes to replace the grating.
 - c. The treatment tanks and piping have significant rust. The treatment units are reaching the end of their useful life and plans must begin for significant repair, replacement, or connection to public sewers when/if available.

2. **NPDES Permit Part III, 3 – Schedule of Compliance:** Your NPDES permit contains a schedule of compliance for installation of dechlorination facilities. A PTI was approved 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. **Ohio Administrative Code Chapter 3745-33-03 - NPDES Permit Status:** It is our understanding that Capstone Properties, LLC is interested in assuming the NPDES permit for this facility. In order to do so, complete an Application to Transfer an Ohio NPDES permit and submit it to this office. No fee is necessary. See the form at: <http://www.epa.ohio.gov/LinkClick.aspx?fileticket=MSuQOx28ciw%3d&tabid=3521>

As you are aware, the Ohio Attorney General recently negotiated a Consent Order against your facility containing injunctive relief and civil penalties because of the manner in which you have operated the wastewater treatment plant. You should make every effort to comply with the Consent Order and to return the facility to compliance with the Ohio Water Pollution Control Act, Revised Code Chapter 6111.

Please respond, in writing, within 30 days of receipt of this report, to Items 1 and 2 listed above. If you have any questions, please contact me at your convenience at (740) 380-5284.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

c: Bob Prebe, Capstone Properties, LLC
c: Athens County Health Department

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPV00007*FD	OH0050334	March 31, 2012	R	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Raymond Croxford	3:40 p.m.	October 1, 2001
	Exit Time	Permit Expiration Date
	4:00 p.m.	September 30, 2006

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Name, Address, & Title of Responsible Official	Phone Number
Ray Croxford, Owner dba Knollwood Mobile Home Park 7343 Cameron Road Athens, Ohio 45701	(740) 541-5520

C. AREAS EVALUATED DURING INSPECTION

<u> N </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> N </u> Effluent/Receiving Waters	<u> N </u> Self-Monitoring Program
<u> N </u> Facility Site Review	<u> N </u> Sludge Storage/Disposal	<u> </u> Other
<u> N </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. Operations: See attached letter Item 1.
2. Compliance Schedules: See attached letter Item 2.



Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

4/30/12

 Date



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

5/1/12

 Date