



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 6, 2012

RE: HOLMES COUNTY
WASHINGTON TOWNSHIP
KAUFMAN TRAILER PARK
OHIO EPA PERMIT NO. 3PV00127*AD

Christine and Gary Kaufman
Kaufman Trailer Park
6963 Township Road
Nashville, OH 44661

Notice of Violation

Dear Ms. Kaufman and Mr. Kaufman:

On May 22, 2012, a site inspection was conducted at the above referenced facility located at Township Road 466, Washington Township, Holmes County. During the inspection, I was accompanied by Dean Stoll of Ohio EPA and Kraig Bucklew of the Holmes County General Health District. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit.

The 6,000 gallons per day extended aeration plant (treatment works) consists of a trash trap, extended aeration system with clarifier, dosing chamber, surface sand filtration, chlorine disinfection, dechlorination, and evaporation pond. Sludge management consists of transferring sewage sludge to another treatment works when needed. The treatment works discharges to an unnamed tributary to Lake Fork Mohican River.

Observations

The following observations were made during the inspection:

1. A new splitter box was installed;
2. The sand within the surface sand filters was replaced. The wall of the surface sand filter has been corrected to eliminate the window that previously allowed ponded wastewater to discharge directly to the unnamed tributary to Lake Fork Mohican River;
3. The control box for the dosing chamber was repaired;
4. The aeration tank is currently organically underloaded;
5. The sludge return line to the aeration tank was not functioning;
6. An air leak was present within the clarifier that still must be repaired; and
7. Solids were present within the wier of the clarifier that must be cleaned.

Operator Certification Requirements

Part II.A of the NPDES permit establishes specific operator certification requirements and minimum staffing requirements for the Class I facility.

Ohio EPA records indicate that Dean's Backflow Services is no longer the operator of record for the treatment works. According to your January 25, 2012 letter to Ohio EPA, you state that you are "going to take the next class available to get certified to take care of my own system." Please provide an update regarding this matter.

Failure to have an operator of record for the treatment works constitute violations of Ohio Revised Code, Chapter (ORC) 6111.07 and Part II.A of the NPDES permit.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMR) received by Ohio EPA for the period March 1, 2010 through June 1, 2012 indicates that the following violations have occurred.

EDMRs for the treatment works have not been submitted to Ohio EPA for the period of March 1, 2011 to June 1, 2012. The treatment works must immediately being submitting eDMRs to Ohio EPA in accordance with the treatment works' NPDES permit. In addition, eDMRs submitted to Ohio EPA for the period on December 1, 2012 to February 1, 2012 were greater than thirty days late. **Failure to submit eDMRs to Ohio EPA constitutes violations of ORC 6111.07 and Part I of the NPDES permit.** Please be aware that treatment works is currently defined in U.S. EPA's definition of "significant noncompliance" based upon the eDMR reporting violations.

Corrective Actions

Within fourteen (14) days of receiving this notice of violation, you must submit written correspondence to Ohio EPA detailing how each violation will be resolved and the corrective action(s) that have been or will be implemented to address the above violations occurring at the treatment works. The written report must include the date that each corrective action has been or will be implemented; and

In addition, Ohio EPA is requesting you to schedule a meeting by June 30, 2012 to discuss the treatment works operation and the above violations. Please contact me in order to schedule the meeting that will be held in Ohio EPA's northeast district office.

Failure to resolve the violations will result in Ohio EPA pursuing formal enforcement, whereby violations of ORC Chapter 6111 are punishable by fines up to \$10,000 a day per violation. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail at chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody.
Environmental Specialist II
Division of Surface Water

CM/cs

cc: Kraig Bucklew, Holmes County General Health District

ec: Dean Stoll, Ohio EPA, DSW, NEDO