



Environmental  
Protection Agency

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

March 16, 2012

Highland County Commissioners  
119 Governor Foraker Place, Suite 211  
Hillsboro, OH 45133

**RE: Rolling Acres WWTW/Compliance Evaluation Inspection  
NPDES Permit No. OH0041165/OEPA PERMIT NO. 1PG00100\*FD**

Gentlemen:

On March 7, 2012, I conducted an NPDES Compliance Evaluation Inspection at Rolling Acres Wastewater Treatment Works (WWTW). Mr. Aaron Moore, with Environmental Engineering Services, was present during this inspection and represented Highland County. I also spoke with Steve Canter (EES) over the telephone during and after the inspection. The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES Permit. A copy of the report is provided within.

Please pay special attention to the "items requiring correction" in **bold type**, as there are associated compliance schedules. Thank you and your staff for time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at [joshua.jackson@epa.state.oh.us](mailto:joshua.jackson@epa.state.oh.us).

Respectfully,

Joshua Jackson  
Environmental Specialist II  
Division of Surface Water

JJ/tf

cc: Steve Canter, EES

Enclosures

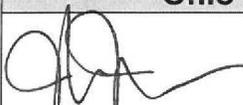
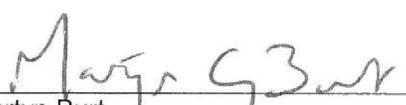


State of Ohio Environmental Protection Agency  
Southwest District Office

### NPDES Compliance Inspection Report Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PG00100*FD	OH0041165	3/7/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Rolling Acres Subdivision WWTW Mad River and Grand Roads New Market Township, Highland County		5/2/2007
	Exit Time	Permit Expiration Date
		5/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Aaron Moore, Class II WW operator (EES)	513-383-6047	
Jim Spargur, Class I WW operator (EES)	513-383-6044	
Steve Canter, Class III WW operator (EES)		
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
No Operator of Record form provided		
Name, Address and Title of Responsible Official	Phone Number	
Highland County Commissioners 119 Governor Foraker Place, Suite 211 Hillsboro, OH 45133	937-393-1911	

Ohio EPA Inspector	Ohio EPA Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 3-16-2012	Date 3/19/12

Permit # : 1PG00100\*FD  
 NPDES # : OH0041165

Average Daily Design Flow:	<b>10,000 Gallons/Day</b>
Plant Serves:	approximately 35 users (homes, mobile homes and apartments)
Average Daily Flow: (Period of Review):	<b>23,500 Gallons/Day (January - December 2011)</b>
Method of flow monitoring:	<b>Weir with electronic level sensor</b>
Type of alarms for plant:	<b>High level alarm for equalization tank and sand filter dosing tank</b>

**Pretreatment**

Type of Pretreatment: **Trash Trap**  
 Does the Trash Trap need pumped: **No**  
 Maintenance of pretreatment components is: **Good**

**Comments/Status:**

Last pumped out on January 25, 2012.

**Secondary Treatment  
(Aeration)**

Color of sludge: **Medium Brown**  
 Quality of Sludge: **Medium**  
 Foam: **None present**  
 Odor: **No objectionable odor present**

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...**Good**

**Comments/Status:**

**Secondary Treatment  
(Settling)**

Clarity: **Clear**  
 Condition of Weir: **Clean**  
 Weir is level: **Yes**  
 Effluent in weir: **Clear**  
 Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Good**

**Comments/Status:**

**Tertiary Treatment**

	Yes	No		Yes	No
Surface sand Filters: <b>Slow</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Subsurface</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UV present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dechlorination present	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overall maintenance of components is: **Good**

**Comments/Status:**

Sand filter needs to be leveled.  
 No tablets were present in the chorinator/dechlorinator because it is not recreation season.

**Sludge Handling/Storage Disposal**

Hauler name: **EES**  
 Disposal Site: **Rocky Fork WWTW**  
 Sludge wasted from: **Sludge holding tank**  
 How often is sludge wasted: **twice/year**  
 Sludge drying beds: **No**                      Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

**Comments/Status:**

**Record Keeping/ Operator of Record**

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... Y
- (d) Has the Operator of Record submitted an ORC Notification form.. N
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7).... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)  

Hard bound
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- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) 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
    - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
    - ii. Laboratory results (unless documented on bench sheets)... N
    - iii. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

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**Plant Discharge**

Discharge point is a: **Stream**  
Name of discharge point: **Unnamed tributary of Dodson Creek**  
Discharge is visible: **Yes**                      Quality of Effluent: **Clear**

Comments/Status:

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Inspection Findings  
(Items for Correction in Bold Type)

**EFFLUENT LIMIT VIOLATIONS**  
(Period of Review: January – December 2011)

7D = Weekly    30D = Monthly    1D = Daily  
Conc. = Concentration (mg/l)    Qty.= Quantity (Kg/Day)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value
May 2011	001	Total Suspended Solids	30D Qty	0.455	1.37774
May 2011	001	Total Suspended Solids	7D Qty	0.682	1.37774
May 2011	001	Nitrogen, Ammonia (NH3)	30D Qty	0.0379	.06731
May 2011	001	Nitrogen, Ammonia (NH3)	7D Qty	0.0568	.06731
May 2011	001	CBOD 5 day	30D Qty	0.379	.9963
May 2011	001	CBOD 5 day	7D Qty	0.568	.9963

\*Ohio EPA did not receive any non-compliance notifications for the violations listed above. Part III, item 12 of the facility's NPDES permit requires an email or letter notification, which will outline the basic causal information surrounding the nature of the violation and the steps that will be taken in order to prevent similar violations in the future. A non-compliance notification report for the violations shown above shall be submitted to this office no later than March 30, 2012.

Quality Assurance & Standard Operating Procedures

The foundation of the NPDES permitting program is the reliability of data "self-reported" by wastewater dischargers under permit. Part III, 3., of the Highland County's NPDES permit requires "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..." Part III, 5., goes on to say, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136... The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."

The federal regulatory benchmark for all water and wastewater sampling/laboratory procedures is 40 CFR 136. This rule lists acceptable sampling and laboratory procedures published in "Standard Methods for the Examination of Water and Wastewater" (Standard Methods) among other resources such as the American Society for Testing and Materials (ASTM).

Standard Methods is a comprehensive reference widely used throughout the industry and is cooperatively published by the American Water Works Association, Water Environment Federation and the American Public Health Association.

Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy". Without a QA program, the county is without defensible data showing compliance with the NPDES permit. Standard Methods goes on to require the inclusion of Standard Operating Procedures (SOP) for each analytical method within the QA manual. The SOP should include the following applicable categories:

- Title • Procedure
- Scope and Application • Calculations
- Summary • Quality Control (calibration)
- Sample Handling and Preservation • Maintenance
- Interferences • Corrective Action
- Apparatus and Materials • Reference (Parent Method)
- Reagents

Mr. Moore did not have any lab equipment at the site nor were any SOPs available. **It is expected that the Highland County develop complete SOPs for all analytical procedures performed at the Rolling Acres WWTW. (including a SOP for sampling protocol) by no later than June 1, 2012.**

**During future inspections, it is expected that these SOPs will be available for review by Ohio EPA compliance staff as well as all components of the SOP (chain-of-custody forms, bench sheets, laboratory equipment manuals, laboratory equipment logbooks, etc.).**

#### Operator of Record Notification Form

According to Ohio Administrative Code 3745-7-02, the NPDES permittee shall designate one or more operator of record to oversee the technical operation of the treatment works and sewerage (collection) system in accordance with paragraph (A)(2) of rule 3745-7-02 of the Ohio Administrative Code. The permittee is required to submit an Operator of Record (ORC) Notification form when this selection is made.

Ohio EPA does not have any documentation showing that an ORC Notification form has been submitted for the Rolling Acres WWTW. **Please submit a completed ORC form to the Ohio EPA Southwest District Office no later than March 30, 2012. A blank ORC form has been attached for your convenience.**

### NPDES Permit Application

The National Pollutant Discharge Elimination System (NPDES) permit, which authorizes the discharge from the WWTW serving Rolling Acres, expires on May 31, 2012. Page 1 of the NPDES permit states, "This permit and the authorization to discharge shall expire at midnight on the expiration date shown above (6-30-2012). In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration." **To date, this office has not received NPDES permit renewal applications.**

**During a telephone conversation after the inspection, Steve Canter (EES) stated that he would submit the NPDES application immediately.**

**Highland County Commissioners shall submit completed NPDES permit renewal application forms (enclosed) to the Ohio EPA Southwest District Office no later than March 30, 2012.**

### Effluent Flow Monitoring

As noted earlier in the report, the reported average daily flows are much higher than the design flow the WWTW. The discharge monitoring report showed around 20 days where the reported daily flow was over 100,000 gallons/day. That being said, there were no effluent violations of pollutant *concentrations* during that same time frame and the WWTW did not have the appearance of a WWTW that is routinely hydraulically overloaded (thin mixed liquor, high quantity of solids on the sand filters, etc.).

Mr. Canter believes that some of the flow values in the discharge monitoring report were entered with the decimal in the wrong position. **He will review this past year's data and re-submit modified discharge monitoring reports by no later than March 30, 2012.** Ohio EPA *strongly encourages* that all reported values are reviewed for consistency in order to avoid careless errors.

During the inspection it was noted that the effluent flow meter was not calibrated in the last year and EES staff were unaware when the last calibration was performed. **Highland County should contract to have the effluent monitoring calibrated by a third party by no later than April 6, 2011 (and annually thereafter) or utilize the elapsed time meters on the sand filter dosing pumps for flow monitoring from this day forward.** For small WWTWs, such as Rolling Acres, Ohio EPA does not object to this method of flow monitoring. **Provide written notification of the completed calibration or the switch in the flow monitoring method to the Ohio EPA Southwest District Office within 7 days of completion.**

Permit # : 1PG00100\*FD  
NPDES # : OH0041165

Accurate discharge flow monitoring is one of the foundational requirements of the NPDES permitting program; pollutant loading-based limitations are discharge flow-driven, as are waste load allocations to meet Ohio water quality standards. Therefore, it is paramount that the county report accurate and defensible data to Ohio EPA.



**Environmental Protection Agency**  
**Division of Drinking and Ground Waters**  
**Operator Certification Unit**

**Operator of Record (ORC) Notification Form**

Ohio Environmental Protection Agency  
 Division of Drinking and Ground Waters  
 Operator Certification Unit  
 50 West Town St, Suite 700  
 P.O. Box 1049  
 Columbus, OH 43216-1049

Phone: (614) 644-2752  
 1- 866 - 411-OPCT (6728)  
 Fax: (614) 644-2909  
 email: opcert@epa.state.oh.us  
 website: http://www.epa.ohio.gov/ddagw/opcert.aspx

**I. SYSTEM INFORMATION**

Name of System: \_\_\_\_\_ Phone Number: \_\_\_\_\_

PWS ID/NPDES Permit #: \_\_\_\_\_ STU #: \_\_\_\_\_ Classification: \_\_\_\_\_

\_\_\_\_\_  
 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

**II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)**

Public Water System (PWS)	Distribution System	Treatment Works	Collection System
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**III. OPERATOR OF RECORD INFORMATION**

Add Additional (A), Existing (E), New (N) or Remove (R)	Effective Date	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. I have a valid certification of a class equal to or greater than the classification of the above referenced facility. (Signature of certified operator)*

\* A signature by an operator of record who is being removed is not required.  
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: \_\_\_\_\_ hours/week \_\_\_\_\_ days/week

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	