



**Environmental
Protection Agency**

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

Re: Notice of Violation
Henry County
Pathstone
NPDES Permit

August 29, 2012

Ms. Cassie Rickenberg
Pathstone
2-453 County Road V
Liberty Center, Ohio 43532

Dear Ms. Rickenberg:

On August 17, 2012, an inspection and compliance meeting was conducted at the Pathstone Wastewater Treatment Plant (WWTP) located on County Road V, Washington Township, Henry County. Attendees from Pathstone included yourself and your consulting engineer, Mr. David Geringer, via the phone. You provided operations and maintenance information regarding the treatment system. This plant currently has a National Pollutant Discharge Elimination System (NPDES) permit (Number 2PS00011). No samples were taken to verify compliance with permit limits.

Inspection Observations

During my inspection the following observations were made:

1. The wastewater in the aeration tanks was grey.
2. The aeration units, skimmers and sludge return lines were not operating.
3. The sand filters were clear of vegetation.
4. The sand filters were not raked level and the outlets to the sand filter did not appear to be blocked.
5. Effluent from the sand filters was not observed; however, the influent into the sand filters appeared clear and odorless.
6. The log book did not appear to have entries later than 6/11/2012. The operator of record log should be kept on site at the facility and available for review during inspections.

You are in violation of Part I, C, Schedule of Compliance, of the NPDES permit, which required compliance with the final fecal coliform limits within 12 months of the effective date of the permit. Fecal coliform limit violations result from the lack of disinfection treatment at your facility.

A pump runtime meter has been installed at the WWTP and should be maintained and monitored to document the reduction of inflow and infiltration (I & I) into the wastewater treatment plant during rain events. The volume of flow discharging to the stream is used to calculate the loading limits, which are specified in your NPDES permit. After reviewing your eDMR reports, it appears that flow monitoring data has been reported incorrectly and you will need to revise the recent eDMR.

Compliance Meeting Summary

Prior to my inspection of the WWTP, I discussed with you our findings regarding the water flow meter data you submitted to our office. The data that you provided to our office was intended to show that the flow used at the facility was less than the state standards listed for an office worker (20 gallons per day) and for a migrant worker (50 gallons per day) Ohio Administrative Code (OAC) 3745-42-7; *Design flow requirements for treatment works sized for one hundred thousand gallons per day or less*. However, there was not enough data available to document actual water used on site for an entire year. In addition, the flow meter at the water treatment facility measures the water that is pumped from the well to the storage tank. Therefore, the flow values do not directly correspond to daily usage.

As a result, we will default back to the state standard design flows for office workers and migrant workers when sizing a replacement on-site wastewater treatment system. However, the maximum daily flow calculated in my previous letter for this site will be reduced due to a reduction in the number of employees and migrant workers anticipated to be served on this site. The data you provided did document that for the last two years you had not exceeded 17 migrant workers on-site per day. The system will be sized for 19 migrant workers at 50 gpd per person, which would generate 950 gallons per day. The front building, which is an office building, may reach 20 office workers at 20 gpd per person, which would generate 400 gpd.

For sanitary flow, using the design flow numbers discussed above, we would consider recommending approval of detail plans that indicate the following options (all options are for on-lot systems that do not discharge off site):

Option 1

For the office buildings (1-2 buildings at front of the property – 400 gpd):

A settling tank (1,000 gallons) – leaching tile field (400 lineal feet of leaching tile trench) sewage treatment system.

For the migrant worker housing (2 buildings at the back of the property – 950 gpd):

A settling tank (2,500 gallons) or two (1,000 gallon) tanks in series – leaching tile field (950 lineal feet of leaching tile trench, designed so that no more than one gpd discharges to one lineal foot of leaching tile field per day).

Option 2

For the combined wastewater flow of both the office buildings and the migrant worker housing to be treated in one system (1,350 gpd):

A settling tank (3,500 gallons) – aerated equalization tank (3,000 gallons) – leaching tile field (900 lineal feet of leaching trench, designed so that no more than one gpd discharges to one lineal foot of leaching tile field per day).

Option 3

For the combined wastewater flow of both the office buildings and the migrant worker housing to be treated in one system (1,350 gpd):

A settling tank (3,500 gallons) – sand filter or peat bio filter for pretreatment – leaching tile field (1,400 lineal feet of leaching tile field).

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Leaching Tile Field Requirements

The leaching trench bottoms shall be placed at least four feet above the maximum groundwater elevation. Trenches should be as high as possible in the soil to maximize the usable soil for treatment. The system will include construction of multiple cells to provide periodic resting, standby capacity, and space for future repairs or replacement. The maximum length of any gravity leaching lateral should not exceed one hundred feet. The depth to groundwater elevation must be indicated on the plans as verified by your engineer.

Site Layout and Setback Requirements

The tile field must be located in undisturbed soil away from paved areas, isolated from all vehicular traffic, with consideration of any future building expansions. A tile field replacement area should also be available and indicated on the detail plans. Soil absorption area should not be located within 20 feet of any occupied building.

Please be advised that an onsite settling tank/leaching tile field system is considered to be a temporary system that will be required to be abandoned when public sewers become available.

Enclosed is our completed inspection report. If you have any questions, please call me at (419) 373-3067.

Yours truly,


Dana Martin-Hayden
Division of Surface Water

/jlm

Enclosure

pc: Dave L. Geringer
Eric Kurfis, CWS

ec: Tracking

OHIO ENVIRONMENTAL PROTECTION AGENCY
OPERATION AND MAINTENANCE INSPECTION
WWTP'S LESS THAN 25,000 GPD

NPDES Permit No. 2PS00016

Facility Name Rural Opportunities (Pathstone) Expiration Date January 31, 2013

Facility Address 2-453 CR Date 8/17/2012 Time 11:00 am / pm

City Liberty Center County Henry Township _____

Name and Address of Owner Henry County, 2-453 County Road V, Liberty Center, Ohio 43532

Person Contacted Kirk Chambers Owner Phone 419-908-5180 work

Flow: Design 60,000 GPD Present 30 office workers only GPD (metered - estimated)

Trib. Pop. 12 office workers and summer residents up to approx. 20(actual - estimated)

Weather at time of inspection: Temp 70's Sunny

OEPA Personnel Dana Martin-Hayden District NWDO

1. Plant Effluent - Mark Severity No. Not Observed to stream

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear		None		Colorless
1	Mild						Slight Brown
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

2. Effect of effluent on Receiving Stream Name: No effluent to stream observed

No.	Severity Description	No.	Turbidity	No.	Odor	No.	Color
0	None		Clear		None		Colorless
1	Mild						
2	Moderate		Light Solids		Musty		Grey
3	Serious						
4	Extreme		Heavy Solids		Septic		Black

3. a. Plant has excellent good X fair _____ poor operation
 b. Plant has excellent good X fair _____ poor maintenance
 c. Sand filters have excellent X good _____ fair _____ poor maintenance

d. Not operating at expected efficiency due to:

- (1) _____ hydraulic overload
 (2) _____ organic/ solids overload
 (3) _____ personnel inefficiency
 (4) _____ equipment failure
 (5) _____ wastes
 (6) not enough Sewage for size of plant

Disinfection: (Required May 1 thru Oct.31.)	
IN	OUT
_____	_____ Chlorination Tablets
_____	_____ Dechlorination Tablets
_____	_____ U.V.

Yes No

4. X Compliance with NPDES Permit

Periodic Violations Y N Parameters: _____

Chronic Violations X _____ Fecal no treatment, TSS, DO, Ammonia

5. X Adequate plant safety

6. X Operation and Maintenance Service Name Kirk Chambers

Frequency of Visits 1/Week

Facility Name: Rural Opportunities (Pathstone)

Process	# Units	Unit	If Needed - Description and Comments
Preliminary		Trash Trap	Pumping Frequency:
		Grease Trap	Pumping Frequency:
		Bar Screen	
	1	Comminutor	Black sludge collecting in the comminutor tank
		Flow Equalization	
Aeration Equipment	2	Plant Timer __Y__ N	Cycle Time: blowers were not on.
		Motor/ Blower Unit	
Secondary Treatment	10	Aeration Tank	Color: dark grey color Adequate Aeration: Y __ N_X__
Final Settling	2	Clarifier	5000 gallon, dark black color, tank clearer at top of tank
	4	Sludge Return	In _____ Out_X
	2	Surface Skimmer	In _____ Out_X
		Fixed Media Clarifier	
Tertiary Treatment	2	Surface Sand Filter	
		Polishing Pond	
		Other	
Disinfection		Chlorine Tube Feeder	None Present
		Dechlorination Tube Feeder	None Present
		Ultraviolet (UV)	
Flow Metering		Elapsed Pump Time	
		Recorder (continuous total)	
Pumps		Raw Wastewater (type)	
	2	Sand Filter Effluent Dosing	Dosing box has been repaired and is now functioning very well.
Sludge Handling		Aerated Storage Tank	
		Sludge Drying Bed	
Sludge Disposal		Municipal POTW	
		Landfill	
		Land Application	
Advanced Treatment		Post Aeration	
		Spray Irrigation	
		Other	They are hoping to replace this plant with a septic system leach tile field, efforts to measure l and ! flow.