



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

October 11, 2012

Mr. James R. Hoekstra  
Managing Member  
Marne Manor LLC  
P.O. Box 4102  
Newark, Ohio 43058-4102

**Re: Marne Manor LLC  
NPDES Permit 4PV00119/ OH0136123  
Compliance Evaluation Inspection  
Notice of Violation  
Licking County**

Dear Mr. Hoekstra:

On October 3, 2012, a compliance evaluation inspection was conducted at the Marne Manor MHP WWTP. Present for the inspection were Tammi Gall, the contract operator for Marne Manor WWTP and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. The findings of the inspection are listed below and in the enclosed Notice of Violation.

- *The WWTP is not secure (Figure 1). Tank gratings can be easily removed and rusted gratings pose a safety concern. The influent splitter box is open to the air allowing unrestricted contact. Sand filters are accessible by anyone and undisinfected WWTP effluent may be contacted by curious individuals either in the filter media or uncovered splitter boxes. The owner shall install appropriate infrastructure to limit access to only authorized persons. This may include such things as locking bars over the tank gratings, splitter box covers and fencing for the sand filters or just a security fence around the entire WWTP. These security features shall be installed no later than December 31, 2012, with photographic proof of installation sent to Paul Vandermeer via e-mail.*
- *Trash trap is pumped out annually in November. The operator will forward a copy of the invoice to Paul Vandermeer via e-mail within 30 days of the pumping of the trap.*

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- *Maintenance is satisfactory with the exception of the badly rusted gratings (Figure 2). The owner shall replace these gratings with new or refurbished ones by the end of December 2012.*
- *The owner shall install signage identifying the outfall to Bowling Green Run in accordance with the requirements in Part II.N of the NPDES permit. This should have been accomplished by March 1, 2011 but has yet to be completed. Signage shall be installed by no later than December 31, 2012 and documented to Paul Vandermeer via e-mail by that time.*

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at [paul.vandermeer@epa.ohio.gov](mailto:paul.vandermeer@epa.ohio.gov).

Sincerely,

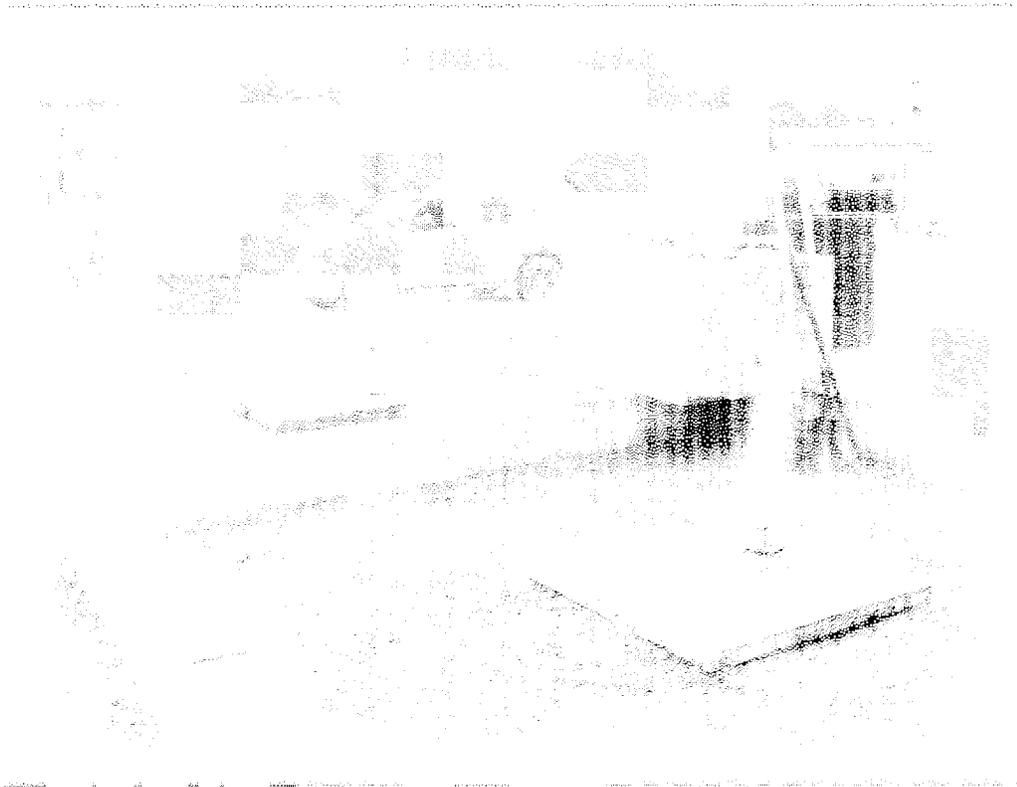


Paul L. Vandermeer  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

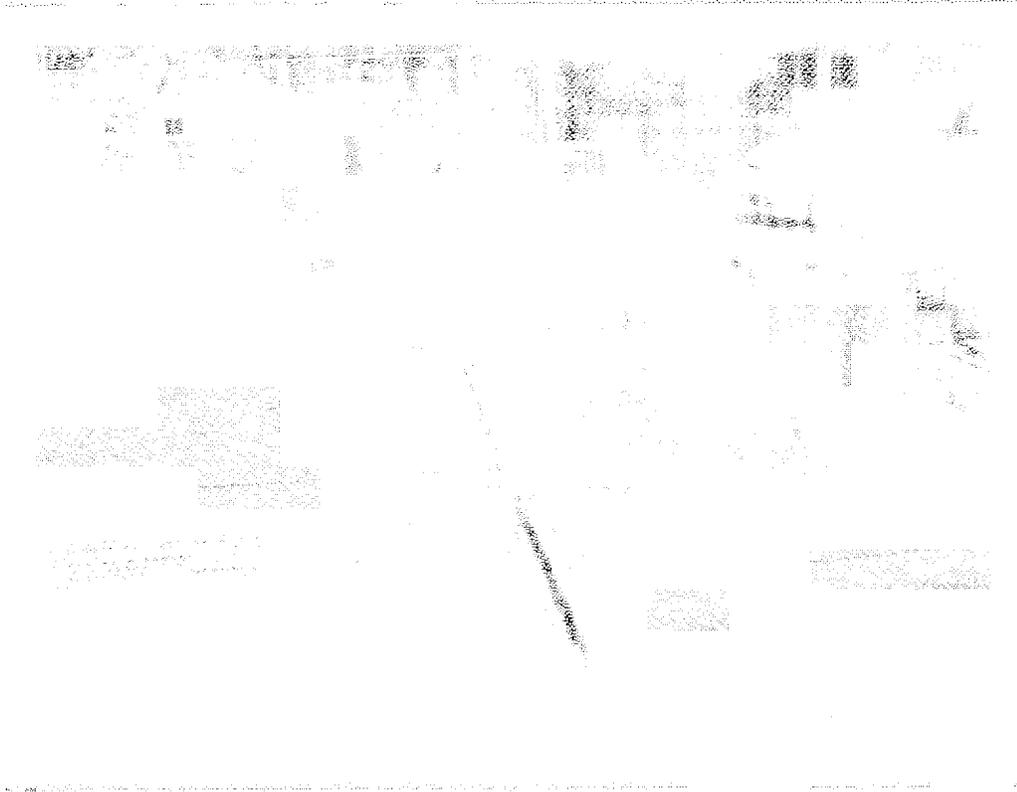
c: Ms. Tammi Gall, Operator

ec: Paul L. Vandermeer

PLV/nsm Marne Manor



**Figure 1.** WWTP is unsecured. Operator has noted that children have been seen playing in the sand filters. The sand filter splitter box (yellow arrow) and open filter beds allow for unrestricted access to undisinfected effluent. All of these circumstances pose a health or physical safety threat. The WWTP must be properly secured to prevent such unauthorized access.



**Figure 2.** The rusted covers on some of the tanks are beginning to be a safety hazard and shall be replaced with structurally sound covers. Also note open influent splitter box (yellow arrow) which also presents a health and safety hazard.

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PV00119	OH0136123	CEI	S	1
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
10/3/2012	12:45 pm	1:15 pm	Yes	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Marne Manor MHP 12483 Marne Road, NE Newark, OH	11/1/2010
	Permit Expiration Date
	10/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Tammi Gall, Contract Operator	(740) 403-4519
Name and Title of Responsible Official	Phone Number
James R. Hoekstra, Managing member	(740) 366-6375

SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	NPDES Compliance	3 violations due to extensive power outage.
M	Operations & Maintenance	Rusted, unsafe gratings
U	Facility Site Review	Plant is not secure, no fencing or locking grates
N	Collection System	
S	Flow Measurement	Potable water meter.
U	Receiving Waters	Discharge pipe signage not installed as required.
S	Laboratory	Coshocton Environmental Testing is contract lab

Comments:

Signatures

	10/9/12		10/9/12
Paul L. Vandermeer, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Mike Gallaway, Reviewer Section Manager Division of Surface Water Central District Office	Date

## Compliance Data for Marne Manor LLC between 8/1/2011 to 10/1/2012

### Summary

Permit Effluent Limit Violations: 3  
 Permit Effluent Code Violations: 0  
 Permit Effluent Frequency Violations: 0  
 Compliance Schedule Violations: 0

Limit Violations						
Report Period	Facility ID	Parameter	Unit	Limit	Reported Value	Violation Date
August 2012	001	COD 5 day	30D Conc	10	15.	8/1/2012
August 2012	001	CBOD 5 day	7D Conc	15	30.	8/1/2012
August 2012	001	E. coli	7D Conc	284	288.	8/1/2012

### Flow Data for Marne Manor LLC between 8/1/2011 and 10/1/2012

	Date	Flows (GPD)
Ten Highest Flows	8/1/2012	2397
	6/1/2012	2075
	1/1/2012	1987
	7/1/2012	1850
	4/1/2012	1767
	5/1/2012	1624
	12/1/2011	1569
	11/1/2011	1563
	2/1/2012	1528
	10/1/2011	1468
<b>Average Flow Rate</b>		1676

Method of flow monitoring:	Potable water usage metering
Type of alarms for plant:	Visual, noted by resident who calls operator.

**SECTION D: PRELIMINARY TREATMENT**

Type of Preliminary Treatment? <i>Trash Trap</i>		
	Yes	No
Does the unit require pumping or cleaning?*	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Maintenance of preliminary treatment is satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status: *\*See body of cover letter.*

**SECTION E: AERATION**

Color of MI S.S.?	Brown			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 operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Foam present?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overall maintenance satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Comments/Status:

**SECTION F: CLARIFIERS**

Clarity of water topping weir	Clear	
	Yes	No
Weir is clean?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Weir is in good condition (i.e., level, free of corrosion, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is effluent present in weir channel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the sludge blanket visible?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Do the clarifier walls need scraping?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is sludge settling properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overall maintenance of the clarifier is satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments/Status: *Sludge blanket not visible due to bad lighting. Effluent barely overflowing weir.*

**SECTION G: TERTIARY TREATMENT**

	Yes	No		Yes	No
Surface sand filters:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface/Upflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input checked="" 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 satisfactory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Frequency of cleaning: *As needed.*

Comments/Status:

**SECTION H: SLUDGE HANDING / STORAGE DISPOSAL**

Sludge is periodically wasted from what component?	<i>Sludge storage tank</i>		
Sludge disposal contractor?	<i>All Star Septic</i>		
Sludge disposal location?	<i>City of Newark</i>		
	Yes	No	
Does the WWTP have sludge drying beds?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Does the WWTP have a sludge holding tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is the maintenance on the sludge handling unit adequate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Comments/Status:

**SECTION I: RECORD KEEPING / OPERATOR OF RECORD**

	Yes	No
Operator of Record holds unexpired license of class required by Permit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Has the Operator of Record submitted an ORC Notification form?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Copy of certificate of Operator of Record displayed on-site?*	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If a Staffing Reduction plan has been approved, are the stipulations of the plan being met?		
Operator of Record log book provided?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Minimum operator staffing requirements fulfilled (OAC 3745-7)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Log book kept onsite (in an area protected from weather)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Log book contains the following:		
Identification of treatment works	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Laboratory results (unless documented on bench sheets)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Identification of person making entries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Logbook Format	Computer log	<b>Bound book</b>

Comments/Status: *The operator of record shall store the logbook on site in a protected and secure location.*

**SECTION J: PLANT DISCHARGE**

Discharge point is:	<i>Bowling Green Run</i>
Discharge is visible:	<i>No</i>
Name of discharge point:	<i>001</i>
Marker present:	<i>No</i>
Quality of effluent:	<i>Clear</i>
Contract laboratory:	<i>Coshocton Environmental Testing, all but pH, D.O., temp.</i>

Comments/Status: