



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

November 8, 2012

**Re:** Guernsey County  
Coventry Estates I  
Compliance Inspection  
OPG00010; OH0050393  
Correspondence (PWW)

Guernsey County Board of Commissioners  
627 Wheeling Avenue  
Suite 300  
Cambridge, Ohio 43725-2251

Dear Board of Commissioners:

On October 31, 2012, I conducted a Compliance Evaluation Inspection (CEI) of the Coventry Estates I wastewater treatment plant. The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES Permit Number OPG00010\*HD. Myself and Operator Dennis Daughtery were present during the inspection.

As a result of the inspection, I have the following comments:

1. A review of the facility's discharge monitoring reports (DMRs) from January 2010 to September 2012 shows 2 violations for ammonia nitrogen (NH<sub>3</sub>). The operator indicated in a previous response that the NH<sub>3</sub> violations were due to the blower going out of service from July 6 through the July 8.
2. The influent wastewater to the plant appeared diluted due to recent rains and inflow/infiltration (I/I) in the collection system. The aeration tank appeared well aerated and was a good brown color. However, solids were being lost out of the clarifier to the sand filters due to hydraulic overloading of the plant from the I/I. The sand filter in use at the time was clean and draining well. The two sand filters not in use were clogged with a thin layer of solids.
3. **Part II, Item K of NPDES Permit OPG00010\*HD:** "The permittee shall maintain in good working order and operate as efficiently as possible the 'treatment works' and 'sewerage system' as defined in ORC 6111.01 to achieve compliance with the terms and conditions of this permit..." The previous NPDES permit contained a compliance schedule to develop a plan to address I/I. A review of the data from January 2010 through September 2012 showed that the daily flow exceeded the average daily design flow of plant 93 times with flows exceeding 80,000 gpd on

two occasions. I/I continues to be an issue in the collection system resulting in hydraulic overloading to the plant. Please continue to follow the plan to address I/I and submit an annual report by January 15 each year detailing work completed in the collection system.

4. **Part III, Item A(3) of NPDES Permit OPG00010\*HD:** "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." The effluent flow meter was last calibrated October 11, 2011. The effluent flow meter should be calibrated on an annual basis. Please have the meter calibrated.
5. **Part III, Item P of NPDES Permit OPG00010\*HD:** "Not later than 4 months from the effective date of this permit, the permittee shall post a permanent marker on the stream bank at each outfall..." During the inspection it was noted that the sign had not yet been posted. Mr. Daughtery indicated the signs had been ordered. Please inform this office once the sign has been posted.
6. At one time, there was discussion on connecting the Coventry Estates I & II WWTPs to the city of Cambridge. Please provide an update on these plans.
7. During the inspection, I discussed with Mr. Daughtery the reporting of *E.coli* results. When the lab results are reported as "<50 #/100ml", it should be reported as "AA (50)" in the DMR instead of just reporting "50".
8. All equipment was in operation at the time of the inspection and chlorination and dechlorination tablets were still being used. The mechanical components of the facility appeared to be in good working order, however, the steel tanks, which are approximately 40 years old, show signs of deterioration. If the board has not already done so, you should begin to plan for the replacement of these tanks.
9. The effluent was observed at the final outfall and did not have any observable impacts on the receiving stream.

Please address and provide a response to items #4, 5 and 6 within thirty (30) days upon receipt of this letter.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the

environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

Attached is a copy of the inspection report. If you have any questions about my inspection, please feel free to contact me at (740) 380-5418 or by email at [tim.fulks@epa.state.oh.us](mailto:tim.fulks@epa.state.oh.us).

Sincerely,



Timothy A. Fulks  
District Representative  
Division of Surface Water

TF/dh

Enclosure

c: Dennis Daughtery, Plant Operator



State of Ohio Environmental Protection Agency  
Southeast District Office

Semi-Public NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
OPG00010*HD	OH0050393	October 31, 2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Coventry Estates I WWTP Hillcrest Lane Cambridge, Ohio 43725	8:45 p.m.	July 1, 2010
	Exit Time	Permit Expiration Date
	10:00 p.m.	June 30, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Dennis Daugherty, Operator	(740) 260-4958	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Dennis Daugherty, Operator	(740) 260-4958	
Name, Address, and Title of Responsible Official	Phone Number	
Guernsey County Board of Commissioners 627 Wheeling Avenue, Suite 300 Cambridge, Ohio 43725-2251	(740) 432-9200	

Section D: Summary of Findings (attach additional sheets if necessary)	
1. I/I in the collection system needs to be addressed 2. Effluent flow meter needs to be calibrated 3. No sign was present at the outfall  See attached letter for further details on this inspection	
Inspector	Reviewer
 <b>Timothy A. Fulks</b> Division of Surface Water Southeast District Office	 <b>Jennifer M. Witte</b> Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office
11/8/12 Date	11/9/12 Date

Average Daily Design Flow:	<b>25,000 Gallons/Day</b>
Plant Serves:	<b>41 homes, 13 apartments</b>
Average Daily Flow:	<b>13,400 Gallons/Day</b>
(Period of Review):	<b>(Jan 2010 through September 2012)</b>
Method of flow monitoring:	Weir and ultrasonic level sensor
Type of alarms for plant:	High level alarms for sand filter dosing pumps

### Pretreatment

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

Comments/Status:

### Secondary Treatment (Aeration)

Color of sludge: **Medium Brown**  
 Quality of sludge: **Medium**  
 Foam: **Light (white)**  
 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is: **Excellent**

Comments/Status:

### Secondary Treatment (Settling)

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

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

**Comments/Status:**

Solids were being lost from the clarifier due to I/I in the collection system

### Tertiary Treatment

	Yes	No		Yes	No
Surface sand filters: <b>Rapid</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input 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 settling components is: **Fair**

**Comments/Status:**

Two of the three sand filters were clogged with solids due to hydraulic overloading to the clarifier from I/I

### Sludge Handling/Storage Disposal

Hauler name: Zemba Brothers  
 Disposal site: Zanesville WWTP  
 Sludge wasted from: Clarifier  
 How often is sludge wasted: Approximately 1/month  
 Sludge drying beds: **No**      Sludge holding tank: **No**

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

**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 ..... N
- (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)  

**Spiral bound notebook**
- (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
  - III. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.) ..... Y
  - IV. Laboratory results (unless documented on bench sheets) ..... Y
  - V. 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:

### Plant Discharge

Discharge point is a:                    **Ditch**  
Name of discharge point:            **Outfall 001**  
Discharge is visible:                **Yes**  
Quality of Effluent:                  **Clear**

Comments/Status:

