



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

February 22, 2013

Re: Athens County
Heatherstone Village
Compliance Evaluation Inspection
Ohio EPA Permit OGV00027*AD
NPDES Permit OHG00056
Correspondence (PWW)

Mr. Robert Prebe, Manager
Heatherstone Village, Ltd.
8644 United Lane
Athens, Ohio 45701

Dear Mr. Prebe:

On January 30, 2013, I conducted a compliance evaluation inspection at the Heatherstone Village mobile home park (formerly Parklane MHP) wastewater treatment plant. Jeff Niese represented the facility during the inspection. The purpose of the inspection was to determine the facility's status of compliance with the terms and conditions set forth in its National Pollutant Discharge Elimination System (NPDES) Permit, OGV00027*AD. A copy of the inspection form is enclosed.

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

1. **Ohio Administrative Code Chapter 3745-33-03 - NPDES Permit Status:** Any permittee who wishes to continue to discharge after the expiration date of his Ohio NPDES permit must file for reissuance of the permit at least one hundred eighty days prior to its expiration.

This facility has an expired general permit for "Small Sanitary Dischargers That Cannot Meet BADCT Standards", because at the time of issuance the wastewater treatment plant did not have dechlorination facilities. The general permit included a compliance schedule with a deadline to install dechlorination facilities by May 1, 2012. Dechlorination was installed in October 2012, per Mr. Niese. I did verify that the dechlorination unit was installed and present on this inspection. Once dechlorination was installed, you were required to apply for General Permit for Small Sanitary Dischargers, OHS000003, by submitting a Notice of Intent (NOI), no later than June 1, 2012. Based on your e-mail from February 1, 2013, you submitted the NOI on February 1, 2013. Once you are covered under the new general permit, coverage under the expired general permit will be terminated.

2. **NPDES Permit Part III, Item 3 – Facility Operation and Quality Control:** 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. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.

The sewer system suffers from excessive inflow and infiltration (I/I). On August 10, 2011, you informed Ohio EPA that leaking manholes were discovered, which would be replaced and that the sewers were being scheduled to be televised. Provide an update on the status of this work, and provide a list of repairs made or to be made and the dates by which the repairs will be accomplished.

The trash trap is located outside the fenced wastewater treatment plant. During the inspection, the outlet lid to the trash trap was missing and poses a danger to children/adults falling into the tank. The operator obtained a large piece of plywood and placed over the opening. Several cement blocks were placed on the plywood to secure it. This lid must be replaced with a tight fitting lid that will prevent entry into the tank immediately.

3. **NPDES Permit Part I, A – Monitoring Requirements:** The permittee failed to comply with the monitoring requirements contained in the NPDES permit. Electronic Discharge Monitoring Report (eDMR) data had not been submitted prior to August 2012. Provide an explanation for the above referenced violations. You are advised that you must submit all monitoring data from the previous month by the 20th of the following month.

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Please reply, in writing, to items 1 through 3 above, within 30 days of the date of this letter. If you have any questions or comments, please contact me at (740) 380-5416 or nick.hammer@epa.ohio.gov.

Sincerely,



Nicholas G. Hammer
Environmental Specialist
Division of Surface Water

NH/dh

Enclosure

c: Jeff Niese, Operator
c: Athens County Health Department

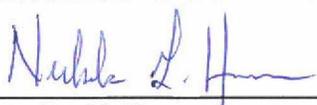
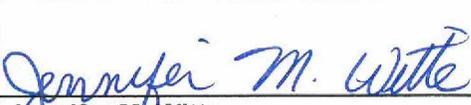


State of Ohio Environmental Protection Agency
Southeast District Office

Semi-Public NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
0GV00027*AG	OHG00056	January 30, 2013	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Heatherstone Village Ltd. Heatherstone Drive Athens, Ohio 45701	11:00 a.m.	
	Exit Time	Permit Expiration Date
	11:45 a.m.	August 1, 2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bob Prebe, Property Manager & Jeff Niese, Operator	(740) 592-2177	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Jeff Niese, Operator of Record	(740) 592-2177	
Name, Address, and Title of Responsible Official	Phone Number	
Bob Prebe, Property Manager & David Funk 8644 United Lane Athens, Ohio 45701	(740) 591-4738 (Mr. Funk)	

Section D: Summary of Findings (attach additional sheets if necessary)			
See attached letter			
Inspector		Reviewer	
	2/22/13		2/25/13
Nicholas G. Hammer Division of Surface Water Southeast District Office	Date	Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	Date

Average Daily Design Flow:	3450 Gallons/Day
Plant Serves:	Currently 9 Residents
Average Daily Flow:	Gallons/Day
(Period of Review):	(January 1, 2008 through January 1, 2013)
Method of flow monitoring:	Water Meter
Type of alarms for plant:	None

Pretreatment

Type of Pretreatment: **Trash Trap**
 Does the Trash Trap need pumped: **Yes**
 Maintenance of pretreatment components is: **Poor**

Comments/Status:

At the time of the inspection, the lid on the outlet of the trash trap was missing. Since this tank is located outside of the fenced in plant, this opening poses a danger to someone falling into the tank. Operator temporarily placed plywood and cement blocks on the plywood to cover opening. Lid must be replaced with a tight fitting lid that will prevent entry into the tank.

Secondary Treatment (Aeration)

Color of sludge: **Dark 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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input type="checkbox"/>	Beds raked	<input type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input 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: **Good**

Comments/Status:

No sand filters on system. Dechlorination unit was installed in October 2012.

Sludge Handling/Storage Disposal

Hauler name: ProCare
Disposal site: Lancaster WWTP
Sludge wasted from: Clarifier
How often is sludge wasted: As needed
Sludge drying beds: **No** Sludge holding tank: **No**

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

Comments/Status:

Record Keeping/Operator of Record

- | | | |
|-----|---|-----|
| (a) | Wastewater Treatment Works classification (OAC 3745-7) | A |
| (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 | Y |
| (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 Book | |
| (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) | N |
| | 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 | N |

Comments/Status:

ORC form is displayed at Capstone Village Office located at 8644 United Lane, Athens, OH 45701.

Plant Discharge

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

Comments/Status:

No Odor observed, Effluent being discharged was clear.