



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

July 15, 2013

RE: HOLMES COUNTY
WASHINGTON TOWNSHIP
KAUFMAN TRAILER PARK
OHIO EPA PERMIT NO. 3PV00127*AD
NOTICE OF VIOLATION

Christine and Gary Kaufman
Kaufman Trailer Park
6963 Township Road 466
Nashville, OH 44661

Dear Ms. Kaufman and Mr. Kaufman:

On June 4, 2013, a site inspection was conducted at the above referenced facility located at Township Road 466, Washington Township, Holmes County. During the inspection, I was accompanied by Kraig Bucklew of the Holmes County General Health District. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit.

The 6,000 gallons per day extended aeration plant (treatment works) consists of a trash trap, extended aeration system with clarifier, dosing chamber, surface sand filtration, chlorine disinfection, dechlorination, and evaporation pond. Sludge management consists of transferring sewage sludge to another treatment works when needed. The treatment works discharges to an unnamed tributary to Lake Fork Mohican River.

Observations

The following observations were made during the inspection:

1. Dosing pump No. 2 was not functioning and requires maintenance;
2. Blower No. 2 was not functioning and requires maintenance;
3. The content of the aeration tank had a chocolate brown color, indicative of a healthy bacterial population.
4. The clarifier had some sludge on the surface, but was clear and did not have any sludge deposits on the weirs. No grates were present over the clarifier, which creates a safety hazard. The grates over the clarifier should be reinstalled;
5. No sludge was observed on the surface sand filters; however, sludge was observed on the ground immediately adjacent to the surface sand filter. Sludge that is removed from the surface sand filter must be properly managed. The sludge located on the ground must be removed for proper disposal (i.e. landfill, etc.);
6. The chlorination system was not stocked with appropriate chemicals at the time of the inspection. The dechlorination system was appropriately stocked with chemicals; and

7. The following records were not available at the treatment works: operator of record's maintenance. The failure to have appropriate records at the treatment works constitutes violations of Ohio Administrative Code Chapter 3745-7-09.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMR) received by Ohio EPA for the period May 1, 2012 through June 1, 2013 indicates that the following violations have occurred:

I. Reporting Violations

EDMRs for the treatment works have not been submitted to Ohio EPA for the following reporting periods: May 2012, June 2012, July 2012, August 2012, November 2012, December 2012, January 2013, March 2013, April 2013, May 2013, and June 2013. The treatment works must immediately begin submitting eDMRs to Ohio EPA in accordance with the treatment works' NPDES permit. **The Failure to submit eDMRs to Ohio EPA constitutes violations of ORC 6111.07 and Part I of the NPDES permit.** Please be aware that treatment works is currently defined in U.S. EPA's definition of "significant noncompliance" based upon the eDMR reporting violations.

II. Frequency Violations

Four violations for Color, Severity (Reporting Code: 00083), thirty-seven violations for Flow Rate (reporting Code: 00056), four violations for Odor, Severity (Reporting Code: 01330), four violations for Turbidity, Severity (Reporting Code: 01350), and four violations for Water Temperature (reporting Code: 00010) have occurred for Station 001. These parameters must be monitored in accordance with the frequencies specified within the NPDES permit and reported to Ohio EPA utilizing eDMR.

Corrective Actions

Within fourteen (14) days of receiving this notice of violation, you must submit written correspondence to Ohio EPA detailing how each violation will be resolved and the corrective action(s) that have been or will be implemented to address the above violations occurring at the treatment works. The written report must include the date that each corrective action has been or will be implemented.

Failure to resolve the violations will result in Ohio EPA pursuing formal enforcement, whereby violations of ORC Chapter 6111 are punishable by fines up to \$10,000 a day per violation.

Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via email at chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM:ddw

cc: Kraig Bucklew, Holmes County General Health District