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

August 8, 2013

**Re:** Hocking County
Valley View Estates MHP
Compliance Evaluation Inspection
NPDES Permit 0GV00037*AG
Correspondence (PWW)

Mr. Mark Anthony
Marlin Trace Investments, Ltd.
15111 State Route 664 North
Logan, Ohio 43138

Dear Mr. Anthony:

On July 11, 2013, I conducted a compliance evaluation inspection of the Valley View Estates MHP northern wastewater treatment plant (WWTP). The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of NPDES permit number 0GV00037*AG. I have the following comments as a result of the inspections and a review of the file:

1. The dosing tank for the sand filters appeared to be discharging partially treated sewage out of a hole on the side of the tank bypassing the sand filters and discharging to the creek. The tank needs to be repaired and the pump needs to be replaced immediately to eliminate the bypass.

2. Part V, Items R and S of the NPDES permit, requires the permittee to notify the Southeast District Office by phone or e-mail of any incidence of noncompliance within 24 hours of discovery. The bypass was never reported to this office. Go to the following web address to complete a noncompliance report and submit it to this office: http://epa.ohio.gov/portals/35/permits/24hour_reporting_Form4498_bypasses.doc

3. The sand filter that is currently off line needs to be repaired and placed on line by September 1, 2013 so the other filter can be rehabilitated.

4. The sand filter that is not being repaired appeared to be plugged and contained several minnows and tad poles. This filter will need to be rehabilitated as soon as the other filter is placed on line.

5. The plant does not appear to have the capability to disinfect the effluent prior to discharge. NPDES permit number 0GV00037*AG has a compliance schedule for the plant to meet certain effluent limits outlined in the permit. The first milestone

in the schedule is to submit detailed plans of the needed plant improvements to this office no later than six (6) months after receiving coverage under the permit. It has been thirty-one (31) months and we still have not received detailed plans to date. Submit the detailed plans along with the permit applications by September 1, 2013.

6. Part IV, Item I of the NPDES permit required you to place a permanent sign on the bank of the receiving stream at the outfall within four (4) months of the effective date of the permit. Please post the sign with all of the information required in Item I.

7. As a part of the inspection, I reviewed your discharge monitoring reports and found minimal data has been submitted to date for the facility. NPDES permit 0GV00037*AG requires daily monitoring for Flow Rate, Color, Odor, and Turbidity and all of the data needs to be reported once a year. The only data that has been submitted for these parameters is for September 2011.

   CBOD 5 day, DO, Fecal Coliform, TSS, and Chlorine Residual need to be sampled and reported in September. The only data that has been submitted for these parameters was taken on September 23, 2011.

   Nitrogen Ammonia is supposed to be sampled and reported two times a year, once in the winter (November - April) and once in the summer (May - Sept.). The only data that has been submitted for Nitrogen Ammonia was taken in March September and December of 2011.

   The missing data needs to be submitted to our Central Office by September 1, 2013.

   Please respond in writing within ten (10) days upon receipt of this letter and provide all of the requested information. If you have any questions feel free to call me at (740) 380-5268.

Sincerely,

Jack Knapp
District Representative
Division of Surface Water

JK/dh

Enclosure

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** |
| 0GV00037*AG | OHGV00082 | 7/11/13 | C | S | 1 |

| Section B: Facility Data | | |
|---|---|---|
| **Name and Location of Facility Inspected** | **Entry Time** | **Permit Effective Date** |
| Valley View Estates MHP<br>9560 State Route 664 N.<br>Logan, Ohio | 1:10 p.m. | December 1, 2010 |
| | **Exit Time** | **Permit Expiration Date** |
| | 1:40 p.m. | December 31, 2014 |
| **Name(s) and Title(s) of On-Site Representatives** | **Phone Number(s)** | |
| none | | |
| **Name(s), Address and Title(s) of Operator of Record** | **Phone Number(s)** | |
| none | | |
| **Name, Address, and Title of Responsible Official** | **Phone Number** | |
| Marlin Trace Investments, Ltd.<br>Mark Anthony, Owner<br>15111 State Route 664 N.<br>Logan, Ohio 43138 | (740) 974-6265 | |

**Section D: Summary of Findings** (attach additional sheets if necessary)

Please see attached letter.

| Inspector | Reviewer |
|---|---|
| 8/2/13 | 8/7/13 |
| **Jack Knapp** Date<br>Division of Surface Water<br>Southeast District Office | **Jennifer M. Witte** Date<br>Compliance & Enforcement Supervisor<br>Division of Surface Water<br>Southeast District Office |

| | |
|---|---|
| Average Daily Design Flow: | **10,000 Gallons/Day** |
| Plant Serves: | **north side of MHP** |
| Average Daily Flow: | **Has not reported flow since 9/30/11 Gallons/Day** |
| (Period of Review): | **(N/A)** |
| Method of flow monitoring: | N/A |
| Type of alarms for plant: | None |

## Pretreatment

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

**Comments/Status:**

## Secondary Treatment (Aeration)

Color of sludge: **Light Brown**
Quality of sludge: **Thin**
Foam: **None Present**
Odor: **Slight**

| | Yes | No | | Yes | No |
|---|---|---|---|---|---|
| Aeration is taking place | ☒ | ☐ | Plant is septic | ☐ | ☒ |
| Blowers are operating | ☒ | ☐ | Blowers are on a timer | ☐ | ☒ |
| Skimmers are operating | ☒ | ☐ | Plant is flooded | ☐ | ☒ |
| Diffusers are operating | ☒ | ☐ | Grating is present | ☒ | ☐ |
| Sludge return is operating | ☒ | ☐ | | | |

Maintenance of aerating equipment is: **Excellent**

**Comments/Status:**

## Secondary Treatment (Settling)

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

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

**Comments/Status:**

## Tertiary Treatment

| | Yes | No | | Yes | No |
|---|---|---|---|---|---|
| Surface sand filters: **Slow** | ☒ | ☐ | | ☐ | ☐ |
| Distribution box operating | ☐ | ☒ | Beds alternated | ☐ | ☒ |
| Are filters ponding/flooding | ☒ | ☐ | Beds raked | ☐ | ☒ |
| Sand filters overgrown | ☐ | ☒ | Chlorination present | ☐ | ☒ |
| UV present | ☐ | ☒ | Dechlorination present | ☐ | ☒ |

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

**Comments/Status:**

The sand and gravel was removed from one filter, and other sand filter had minnows and tad poles living in it. The dosing tank is still allowing sewage to bypass the sand filters through a hole in the side of the tank. The plant does not appear to have the ability to disinfect even if the sand filters were online.

## Sludge Handling/Storage Disposal

Hauler name: unknown
Disposal site: unknown
Sludge wasted from: aeration tank/clarifier
How often is sludge wasted: unknown
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) | A |
| (b) | Operator of Record holds unexpired license of class required by Permit | N |
| (c) | Copy of certificate of Operator of Record displayed on-site | N/A |
| (d) | Has the Operator of Record submitted an ORC Notification form | N |
| (e) | Minimum operator staffing requirements fulfilled (OAC 3745-7) | N |
| (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 | N |
| (h) | Format of log book (e.g. computer log, hard bound book) | |
| (i) | Log book kept onsite (in an area protected from weather) | N |
| (j) | Log book contains the following: | |
| | I. Identification of treatment works | N/A |
| | II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 | N/A |
| | III. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.) | N/A |
| | IV. Laboratory results (unless documented on bench sheets) | N/A |
| | V. Identification of person making entries | N/A |
| (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:**

James Bennett was the operator of record, but is no longer and to my knowledge the plant does not have an operator of record. We have never received any notifications for the plant.

## Plant Discharge

| | |
|---|---|
| Discharge point is a: | **Stream** |
| Name of discharge point: | **Harper Run** |
| Discharge is visible: | **Yes** |
| Quality of Effluent: | **Other** |

**Comments/Status:**

The discharge point is currently at the sand filter dosing tank. The sewage flows to the ground and meanders to Harper Run.