Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 30, 2011

Re: Jefferson County
Lake Lodge MHP
Compliance Evaluation Inspection
Ohio EPA Permit 0PV00012*DD
NPDES Permit OH0114901
Correspondence (PWW)

Mr. Nick Frankovich, General Manager
Property Services
P.O. Box 2005
Weirton, WV 26062

Dear Mr. Frankovich:

On November 9, 2011, I conducted a compliance evaluation inspection at the Lake Lodge MHP wastewater treatment plant. Operator Walt Kubat and yourself were both present during the inspection.

We have received self-monitoring reports covering the months of April 2011 through September 2011 for the referenced facility. Our review indicated the following violations of the conditions of your NPDES permit.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Qty	0.68	1.77895	4/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	3.7	4/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.09	.65821	4/1/2011
001	80082	CBOD 5 day	30D Qty	0.57	1.47653	4/1/2011
001	00530	Total Suspended Solids	1D Qty	1.0	1.77895	4/14/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.7	4/14/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.13	.65821	4/14/2011
001	80082	CBOD 5 day	1D Qty	0.85	1.47653	4/14/2011
001	00530	Total Suspended Solids	30D Conc	12	13.	5/1/2011
001	00530	Total Suspended Solids	30D Qty	0.68	1.67297	5/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	3.1	5/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Qty	0.09	.39894	5/1/2011
001	00530	Total Suspended Solids	1D Qty	1.0	1.67297	5/19/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	3.1	5/19/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Qty	0.13	.39894	5/19/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	4.	6/17/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	2.7	6/24/2011

Southeast District Office
2195 Front Street
Logan, OH 43138-8637

740 | 385 8501
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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	1.	6/30/2011
001	00530	Total Suspended Solids	30D Conc	12	18.	7/1/2011
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.5	2.9	7/1/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	1.1	7/8/2011
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	2.3	2.9	7/13/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	1.3	7/15/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	1.1	7/22/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	1.8	7/29/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	3.1	8/5/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	3.3	8/12/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	1.6	8/19/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	5.9	8/26/2011
001	00530	Total Suspended Solids	30D Conc	12	15.	9/1/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	3.	9/2/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	9/9/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	3.3	9/16/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	5.	9/23/2011
001	00300	Dissolved Oxygen	1D Conc	6.0	4.7	9/30/2011

During the inspection, we discussed that considerable inflow and infiltration was noted by the operator. Reported data suggests high flows in mid to late winter through spring. The facility has a condensed collection system where smoke testing may quickly identify where sewer lines are cracked/damaged and/or similar inflow sources. We discussed that this work should be pursued to help place the facility back in compliance.

I recommend that you perform smoke testing to identify the inflow points in the system. The testing shall document areas of inflow that can easily be adjusted to minimize flow. The smoke test shall be performed by July 2012 with those inflow sources corrected for by August 2012. Please acknowledge in follow up letter whether this action and timeframe is an acceptable compliance plan.

As was also discussed, an adjustable RAS flow may help develop better settling solids. A modification often made to similar plants is to install geyser air lift pumps. See http://airliftpump.com/index.htm

The vast majority of violations are with effluent Dissolved Oxygen (D.O.) concentrations. I have two thoughts on corrections for these violations. I believe the D.O. is metered once Walt returns to the County plant. The elapsed time may show a depletion of D.O. that would not be representative of the effluent. Using a portable D.O. meter may resolve the D.O. compliance issues. The second thought is post-aeration could be provided prior to discharge.

A copy of the inspection report is enclosed. The assistance and cooperation received during the inspection was appreciated. **Please acknowledge in follow up letter whether the above actions and timeframes are an acceptable compliance plan.** If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,

Aaron Pennington
District Representative
Division of Surface Water

AMP/dh

Enclosure

c: Walt Kubat, Wastewater Solutions of Ohio, LLC

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0PV00012*DD	OH0114901	November 9, 2011	C	S	1

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Lake Lodge MHP Approx. 1 mile southeast of Richmond Ohio off S.R. 43	10:30 a.m.	June 1, 2008
	Exit Time	**Permit Expiration Date**
	11:00 a.m.	May 31, 2013

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Walt Kubat, Operator, Wastewater Solutions of Ohio, LLC Nick Frankovich, General Manager, Property Services	(740) 275-1570
Name, Address, & Title of Responsible Official	**Phone Number**
Nick Frankovich, General Manager Property Services P.O. Box 2005 Weirton, WV 26062	

C. AREAS EVALUATED DURING INSPECTION

M	Permit	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	S	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
M	Facility Site Review	N/A	Sludge Storage/Disposal		Other
M	Collection System				

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached cover letter.

Aaron M. Pennington, Inspector, Ohio EPA, Southeast District Office — Date: 11-29-11

Jennifer M. Witte

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date: 11/30/11