*Ashton Estates & Townhouse Master Owner's Association*
*1004 Ashton Drive, Morgantown, WV 26508*

April 16, 2015

West Virginia Department of Environmental Protection
Division of Water & Waste Management
60157th Street, SE
Charleston, West Virginia 25304
Attn: Mr. Patel-Permitting

RE: Ashton Subdivision Sewage Treatment Plant WV0105813
Order No. 8012, issued 1/28/2013
NOV No. W-NW-CJJ-021015-003

Dear Mr. Patel,

The Ashton Estates & Townhouse Master Owner's Association is submitting our Plan of Corrective Action as per Order 8012 and in response to NOV W-NW-CJJ-021015-003. A copy of the letter will be sent to Mr. Bradley C. Swiger in the Fairmont Office.

The permit that was sent to the Association in January of 2013 was filed with other sewage plant paperwork, the Order no. 8012 was not noted by the Board members.

The NOV letter dated March 19, 2015 was picked up when delivered and left with other mail, it was not until recently that the serious nature of the letter was noted. The Association began seeking consultants to explain the problems and find solutions.

**Plan of Corrective Action**

**Excessive violations of the discharge limits** have been caused by several factors, the major problem at this plant is the amount of debris coming into the system. This "debris" consists of paper products other than toilet paper and rags that do not bio-degrade quickly or at all. The association has sent out several notices to residents about the flushing of inappropriate items into the sanitary system without any substantial affect. The debris has been causing the Surge Tank pumps to clog and trip the breakers rending the surge tank useless, allowing system surges to pass into the three aeration tanks pushing solids into the clarifiers and out into the disinfection chamber. High flow into the tablet chlorinator causes the tablets to swell and they do not drop down to provide adequate disinfection. System surges disrupt the balance of the

biological action needed to properly treat the flow. The debris in the surge tank causes a blanket of septic sludge to form in the bottom of the tank and in the aeration tanks which has a negative effect on the biological treatment process. The septic sludge releases Hydrogen sulfide gas that causes rapid deterioration of the grating, grating support beams and the tank. The debris which flows into the aeration tanks clog the sludge returns causing more solids to be pushed out of the clarifier and into the disinfection tank. Solids that should have been sent back to the aeration tank or sludge holding tank end up in the disinfection chamber. These stray solids cannot get disinfected properly causing high fecal coliform and total suspended solid readings.

**Resolution 1:**
The Association will by December 1, 2015 install a basket system on the Surge Chamber to remove debris from the system. Once the basket system is installed and the septic sludge in the surge tank is removed the surge tank pumps will be put back into operation.

The surge tank, once made operational will send a regulated flow to each of the aeration/clarifier units as needed for best performance. Solids will be processed properly and stay within the clarifier to be returned to the aeration chamber or wasted. A steady flow to the tablet chlorinator will allow tablets up in the tube to properly drop and provide constant disinfection. Each aeration/clarifier unit will have the debris and bad sludge removed. Excess solids that have ended up in the chlorine contact chamber shall be removed.

**Resolution 2:**
The plant effluent flow meter readings indicate that the plant is receiving I & I flows during rain events which increase the system surges and related problems. The surge tank, when operational, will hold system surges and small rain events. A large or constant rain event could still cause I & I to over whelm the surge tank. The duration of the surge due to I & I will be greatly reduced with the Surge Tank operational.
The Association will conduct system wide smoke testing to look for I & I entering the system by October 1, 2016.

**Resolution 3:** An outlet sign has been ordered and it will be installed by June 4, 2015 in the correct location outside the fence near the discharge facing the river.

**Resolution 4:** The Association will have the ditch behind the sewage system site re-graded with a minimum slope of 2%, this ditch has had the hillside above move into the ditch blocking flow and pooling water. A ditch and a 15"culvert will be placed at the bottom of the road into the Plant site to divert run off away from the site. The culvert will allow access into the site at the gate. Adequate erosion control will be used at both ditch outlets. This work will be done by December 1, 2015.

Respectfully submitted by the Ashton Estates and Townhouse Owner's Master Association

Stacie Redelman, President Ashton Estates and
Townhouse Owner's Master Association President