



State of Ohio Environmental Protection Agency

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1PV0012720110907

HIGHLAND PLEASANT ACRES MHP

JACKSON, JOSHUA ; 2011/09/07

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Pleasant Acres Corresp.



Environmental
Protection Agency

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

September 7, 2011

Pleasant Acres Mobile Home Park
Attn: Mr. Vernon Garrison
7191 Swisshelm Lane
Hillsboro, OH 45133

**RE: Pleasant Acres MHP WWTW/Compliance Evaluation Inspection
NPDES Permit No. OH0137596/OEPA PERMIT NO. 1PV00127*AD
Notice of Violation**

Dear Mr. Garrison:

On September 1, 2011, I conducted a NPDES Compliance Evaluation Inspection at the Pleasant Acres Mobile Home Park (MHP) wastewater treatment works (WWTW). You were present during this inspection and I followed up, via telephone, with Mr. Ted Rhoads (Operator of Record). The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES Permit. A copy of the report is provided within.

As noted in the attached inspection report, the wastewater treatment works was in good condition and the discharge was free of noticeable solids and objectionable odors. Please pay attention to the item requiring correction in the inspection report as there are associated compliance schedules.

Thank you and Mr. Rhoads for the time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

Cc: Ted Rhoads (with attachments)

Enclosures

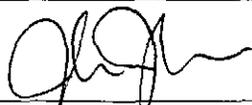
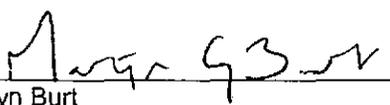


State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00127*AD	OH0137596	9/1/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Pleasant Acres MHP 7146 Eldoranda Circle Highland County	9:30 a.m.	10/1/2006
	Exit Time	Permit Expiration Date
	10:30 a.m.	9/30/2011
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Ted Rhoads, Operator of Record	937-365-1246	
Name, Address and Title of Responsible Official	Phone Number	
Vernon Garrison, Owner 7191 Swisshelm Lane Hillsboro, OH 45133	937-393-2901	

Ohio EPA Inspector	Ohio EPA Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
9-7-11 Date	9/7/11 Date

Permit # : 1PV00127*AD
 NPDES # : OH0137596

Average Daily Design Flow:	11,100 Gallons/Day
Plant Serves:	37 Mobile Homes
Average Daily Flow: (Period of Review):	4,000 Gallons/Day (July 2010 - June 2011)
Method of flow monitoring:	Elapsed time meters on sand filter dosing pumps
Type of alarms for plant:	high water in equalization tank and sand filter dosing wet well.

Pretreatment

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

Comments/Status:

Contents are hauled away every three months by Marshall Septic. The trash trap was last pumped out in July of 2011.

**Secondary Treatment
(Aeration)**

Color of sludge: **Medium 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 checked="" type="checkbox"/>	<input 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: **Excessive Algae/Solids Build Up**
 Weir is level: **Yes**
 Effluent in weir: **Clear**
 Clarifier walls need scraped: **No**

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

Comments/Status:

The effluent weir should be cleaned out without delay.

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Excellent**

Comments/Status:

Sludge Handling/Storage Disposal

Hauler name: **Marshall Septic**
 Disposal Site: **Unknown**
 Sludge wasted from: **sludge holding**
 How often is sludge wasted: **No sludge has been pumped yet.**
 Sludge drying beds: **Yes** Sludge holding tank: **Yes**

Overall maintenance of components is: **Good**

Comments/Status:

Record Keeping/ Operator of Record

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... I
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (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..... 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/E
- (j) Log book contains the following:
 - I. Identification of treatment works..... N/E
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N/E
 - i. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... N/E
 - ii. Laboratory results (unless documented on bench sheets)... N/E
 - iii. Identification of person making entries..... N/E
- (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..... Y

Comments/Status:

Plant Discharge

Discharge point is a: **Ditch**
Name of discharge point: **Unnamed tributary of Rocky Fork Creek**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Inspection Findings

EFFLUENT LIMIT VIOLATIONS (Period of Review: July 2010 – June 2011)

7D = Weekly 30D = Monthly 1D = Daily Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

Reporting Period	Parameter	Limit Type	Limit	Reported Value
July 2010	Total Suspended Solids	30D Conc	12	13.
November 2010	Dissolved Oxygen	1D Conc	6.0	3.
November 2010	Dissolved Oxygen	1D Conc	6.0	3.

Non-Compliance Notification

Part III, Item 12.(A) of the NPDES permit for the Pleasant Acres Mobile Home Park (MHP) wastewater treatment works (WWTW) requires non-compliance notification for "any violation of a maximum daily discharge limitation for any of the pollutants listed by the Director in the permit." Ohio EPA has developed a non-compliance notification form for your use (see attached). Please use this form for any future violations.

The form can also be found at the following website:

<http://epa.ohio.gov/dsw/permits/permits.aspx#noncompliance>

Flow Monitoring

Pleasant Acres MHP WWTW is equipped with elapsed time meters on the sand filter dosing pumps to measure discharge flow. The NPDES permit for the WWTW requires reporting of **daily flow rates**. However, the discharge monitoring reports for the past year show that a discharge flow of 4,000 gpd is reported daily. It is highly unlikely that the WWTW discharged exactly 4,000 gpd every day for the past year.

Accurate discharge flow monitoring is one of the foundational requirements of the NPDES permitting program; pollutant loading-based limitations are discharge-flow-driven, as are waste load allocations to meet Ohio water quality standards. Therefore, it is paramount that Pleasant Acres MHP report accurate and defensible data to Ohio EPA. Elapsed time meter readings shall be taken every day and accurate discharge flow rates shall be reported on the discharge monitoring reports.

Record Keeping

At the time of the inspection, there was no operator of record logbook available at the WWTW. Ohio Administrative Code 3745-7-09 requires the following:

(A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment work, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.

1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.

(2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.

(3) At a minimum, the following information shall be recorded:

(a) Identification of the public water system, sewerage system, or treatment works;

(b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter;

(c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced;

(d) Results of tests performed and samples taken, unless documented on a laboratory sheet;

(e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and

(f) Identification of the persons making entries.

(4) The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.

Pleasant Acres Mobile Home Park shall provide a log book on-site no later than September 30, 2011. This log book must meet all the requirements shown above and must be available upon request (typically during an inspection by Ohio EPA). A good number of small facility operators are placing mailboxes within the fenced area of the WWTW to store the log book (since a mailbox is weather proof).

A letter certifying that this requirement has been met shall be submitted to the Ohio EPA Southwest District Office no later than 5 days after completion.

Quality Assurance & Standard Operating Procedures

The foundation of the NPDES permitting program is the reliability of data "self-reported" by wastewater dischargers under permit. Part III, 3., of the Pleasant Acres MHP NPDES permit requires "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...*" Part III, 5., goes on to say, "Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136... The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements."

The federal regulatory benchmark for all water and wastewater sampling/laboratory procedures is 40 CFR 136. This rule lists acceptable sampling and laboratory procedures published in "Standard Methods for the Examination of Water and Wastewater" (Standard Methods) among other resources such as the American Society for Testing and Materials (ASTM). Standard Methods is a comprehensive reference widely used throughout the industry and is cooperatively published by the American Water Works Association, Water Environment Federation and the American Public Health Association.

Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy". *Without a QA program, the City is without defensible data showing compliance with the NPDES permit.* Standard Methods goes on to require the inclusion of Standard Operating Procedures (SOP) for each analytical method within the QA manual. The SOP should include the following applicable categories:

- Title
- Scope and Application
- Summary
- Sample Handling and Preservation
- Interferences
- Apparatus and Materials
- Reagents
- Procedure
- Calculations
- Quality Control (calibration)
- Maintenance
- Corrective Action
- Reference (Parent Method)

Permit # : 1PV00127*AD
NPDES # : OH0137596

It is Ohio EPAs understanding that the operator of record for Pleasant Acres MHP WWTW performs the testing for dissolved oxygen, pH and temperature. The remainder of the testing is performed by a contract laboratory. **It is expected that the Pleasant Acres MHP develop SOPs for the following analytical procedures (at a minimum) by no later than December 31, 2011: pH, temperature and dissolved oxygen. Each of the SOPs should comply with the analytical methods outlined in Standard Methods. I have attached an example SOP developed by Ohio EPAs laboratory and I have also attached standard methods for all three procedures.**

A letter certifying that this requirement has been met shall be submitted to the Ohio EPA Southwest District Office no later than 5 days after completion.

Changes with the NPDES Permit Renewal

When the NPDES permit is renewed for Pleasant Acres MHP, the following requirements will be added:

- Outfall Signage Required

Not later than 4 months from the effective date of the permit, the permittee shall post a permanent marker on the stream bank at each outfall that is regulated under the NPDES permit where a marker does not currently exist. The marker shall consist at a minimum of the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height. The marker shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed and vegetation shall be periodically removed to keep the sign visible. When an existing marker is replaced or reset, the new marker shall comply with the requirements of this section.

- Operator of Record Staffing Requirements

Ohio Administrative Code 3745-7 requires that the "operator of record shall, at a minimum, be physically present at the treatment works and fulfill the time requirements in the following table and perform technical operation as assigned by the permittee of the treatment works."

For Pleasant Acres MHP WWTW, the staffing requirement for the operator of record is two days per week for a total of 1 hour. The operator of record will need to document time at the WWTW in the operator of record logbook.



Division of Surface Water
Non-compliance Notification for
Exceedance of a Daily Maximum Discharge Limit

Use this form to report non-compliance that is the result of any violation of a **daily maximum discharge limit** for any of the pollutants listed by the Director in your NPDES permit (see Part III, Section 12 of your NPDES permit for details). The form should be completed and e-mailed to the appropriate Ohio EPA inspector, or Ohio EPA office using one of the following addresses:

Southeast District Office: sedo24hournpdes@epa.state.oh.us
Southwest District Office: swdo24hournpdes@epa.state.oh.us
Northwest District Office: nwdo24hournpdes@epa.state.oh.us
Northeast District Office: nedo24hournpdes@epa.state.oh.us
Central District Office: cdo24hournpdes@epa.state.oh.us
Central Office: co24hournpdes@epa.state.oh.us

Permittee Information	
Name of permittee:	
NPDES Permit number:	
Contact name for permittee:	
Contact telephone number:	
Exceeded limit	
Parameter name:	
Provide type of limit exceeded, e.g. concentration, loading, etc.	
Extent of exceedance	
Provide permit limit, e.g. 10 ug/l	
Measured exceedance (include units):	
Cause of exceedance	
Provide an explanation for the cause of the permit limit exceedance:	
Period of exceedance	
Exact time period of exceedance (include times and dates):	
If uncorrected, expected duration	
If the exceedance is not yet corrected, provide the expected time period during which it is anticipated to continue:	
Steps to address exceedance	
Describe all the steps taken to reduce, eliminate, or prevent future occurrence of the exceedance(s):	