



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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50 W. Town St., Suite 700  
Columbus, Ohio 43215

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**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049



\*1PV0012720090427\*

HIGHLAND PLEASANT ACRES MHP

JACKSON, JOSHUA 2009/04/27

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

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State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

April 27, 2009

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

**Notice of Violation**

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

Dear Mr. Garrison:

On April 16, 2009, I conducted an NPDES Compliance Evaluation Inspection at the Pleasant Acres Mobile Home Park wastewater treatment works (WWTW). You were present during the inspection and I followed up with Mr. Ted Rhoads (Operator of Record) after the inspection (by telephone). The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES permit for Pleasant Acres WWTW.

**Please pay special attention to the "items requiring correction" (bold type) located throughout the inspection report, for there are associated compliance schedules.**

Thank you 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](mailto:joshua.jackson@epa.state.oh.us).

Respectfully,

Joshua Jackson  
Environmental Specialist II  
Division of Surface Water

Enclosures



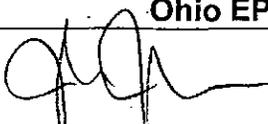
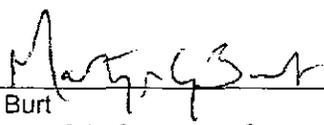


State of Ohio Environmental Protection Agency  
Southwest District Office

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	4/16/2009	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Pleasant Acres WWTW 7146 Eldoranda Circle Highland County	9:30 a.m.	10/1/2006
	Exit Time	Permit Expiration Date
	11:00 a.m.	9/30/2011
Name(s), Address and Title(s) of Operator of Record		Phone Number(s)
Ted Rhoads, Contract Operator		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	
	4-27-09		4/27/09
Joshua Jackson Division of Surface Water Southwest District Office	Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	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 (January 2008 - February 2009)
Method of flow monitoring:	Water Meter
Type of alarms for plant:	dosing pump alarms

**Pretreatment**

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

**Comments/Status:**

**Secondary Treatment  
(Aeration)**

Color of sludge: **Light 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: **Clean**  
 Weir is level: **Yes**  
 Effluent in weir: **Clear**

Permit # : 1PV00127\*AD  
NPDES #: OH0137596

Clarifier walls need scraped: **Yes**

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

**Comments/Status:**

**Tertiary Treatment**

	Yes	No		Yes	No
Surface sand Filters: <b>Slow</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Subsurface</b>	<input type="checkbox"/>	<input type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input type="checkbox"/>	<input checked="" 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: **Fair**

**Comments/Status:**

One sand filter is not settling

**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

As documented in a Notice of Violation (dated January 23, 2009), construction for the wastewater treatment works upgrade is not yet completed. This is a violation of Part 1, C. (b. and c.), of the NPDES permit compliance schedule for the Pleasant Hill MHP WWTW. This section of the compliance schedule states the following:

*Complete construction (of the WWTW) as soon as possible but not later than August 1, 2008. Attain operational level of the treatment works and meet final effluent limits as soon as possible but not later than October 1, 2008.*

The only work left to be completed (from my observations and according to Mr. Garrison), is the perimeter fence, site grading and a problem they have with one of the sand filters (not draining). The site was relatively wet and Mr. Garrison stated that he would have the contractors resume construction as soon as the site dried out. **Construction shall be completed by no later than June 15, 2009.**

**EFFLUENT LIMIT VIOLATIONS  
 (Period of Review: January 2008 – February 2009)**

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

Reporting Period	Parameter	Limit Type	Limit	Reported Value
January 2008	Total Suspended Solids	30D Conc	30	38.
January 2008	CBOD 5 day	30D Conc	25	140.
January 2008	CBOD 5 day	30D Qty	1.06	2.1196
January 2008	CBOD 5 day	7D Conc	40	140.
January 2008	CBOD 5 day	7D Qty	1.69	2.1196
February 2008	Total Suspended Solids	30D Conc	30	32.
February 2008	CBOD 5 day	30D Conc	25	100.
February 2008	CBOD 5 day	30D Qty	1.06	1.514
February 2008	CBOD 5 day	7D Conc	40	100.
March 2008	Total Suspended Solids	30D Conc	30	68.
March 2008	Total Suspended Solids	7D Conc	45	68.
April 2008	Total Suspended Solids	30D Conc	30	58.
April 2008	CBOD 5 day	30D Conc	25	290.
April 2008	CBOD 5 day	30D Qty	1.06	4.3906
April 2008	pH	1D Conc	6.5	6.
April 2008	Total Suspended Solids	7D Conc	45	58.
April 2008	CBOD 5 day	7D Conc	40	290.
April 2008	CBOD 5 day	7D Qty	1.69	4.3906
April 2008	pH	1D Conc	6.5	6.

May 2008	Total Suspended Solids	30D Conc	30	70.
May 2008	Fecal Coliform	30D Conc	1000	10000.
May 2008	CBOD 5 day	30D Conc	25	230.
May 2008	CBOD 5 day	30D Qty	1.06	3.4822
May 2008	pH	1D Conc	6.5	6.
May 2008	Total Suspended Solids	7D Conc	45	70.
May 2008	Fecal Coliform	7D Conc	2000	10000.
May 2008	CBOD 5 day	7D Conc	40	230.
May 2008	CBOD 5 day	7D Qty	1.69	3.4822
June 2008	Total Suspended Solids	30D Conc	30	70.
June 2008	Fecal Coliform	30D Conc	1000	10000.
June 2008	CBOD 5 day	30D Conc	25	420.
June 2008	pH	1D Conc	6.5	6.
June 2008	Total Suspended Solids	7D Conc	45	70.
June 2008	Fecal Coliform	7D Conc	2000	10000.
June 2008	CBOD 5 day	7D Conc	40	420.
June 2008	pH	1D Conc	6.5	6.
July 2008	Total Suspended Solids	30D Conc	30	200.
July 2008	Total Suspended Solids	30D Qty	1.27	3.028
July 2008	Fecal Coliform	30D Conc	1000	10000.
July 2008	CBOD 5 day	30D Conc	25	140.
July 2008	CBOD 5 day	30D Qty	1.06	2.1196
July 2008	Total Suspended Solids	7D Conc	45	200.
July 2008	Total Suspended Solids	7D Qty	1.9	3.028
July 2008	Fecal Coliform	7D Conc	2000	10000.
July 2008	CBOD 5 day	7D Conc	40	140.
July 2008	CBOD 5 day	7D Qty	1.69	2.1196
August 2008	Total Suspended Solids	30D Conc	30	56.
August 2008	Fecal Coliform	30D Conc	1000	10000.
August 2008	CBOD 5 day	30D Conc	25	32.
August 2008	Total Suspended Solids	7D Conc	45	56.
August 2008	Fecal Coliform	7D Conc	2000	10000.
September 2008	Fecal Coliform	30D Conc	1000	10000.
September 2008	Fecal Coliform	7D Conc	2000	10000.
October 2008	Total Suspended Solids	30D Conc	12	122.
October 2008	Total Suspended Solids	30D Qty	0.505	1.84708
October 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.0	2.3
October 2008	Fecal Coliform	30D Conc	1000	10000.
October 2008	CBOD 5 day	30D Conc	10	50.
October 2008	CBOD 5 day	30D Qty	0.421	.757
October 2008	Total Suspended Solids	7D Conc	18	122.
October 2008	Total Suspended Solids	7D Qty	0.757	1.84708
October 2008	Nitrogen, Ammonia (NH3)	7D Conc	1.5	2.3
October 2008	Fecal Coliform	7D Conc	2000	10000.
October 2008	CBOD 5 day	7D Conc	15	50.
October 2008	CBOD 5 day	7D Qty	0.631	.757
November 2008	Total Suspended Solids	30D Conc	12	274.
November 2008	Total Suspended Solids	30D Qty	0.505	4.14836
November 2008	CBOD 5 day	30D Conc	10	35.
November 2008	CBOD 5 day	30D Qty	0.421	.5299

November 2008	Total Suspended Solids	7D Conc	18	274.
November 2008	Total Suspended Solids	7D Qty	0.757	4.14836
November 2008	CBOD 5 day	7D Conc	15	35.
December 2008	Nitrogen, Ammonia (NH3)	30D Conc	3.0	23.7
December 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.127	.35882
December 2008	CBOD 5 day	30D Conc	10	11.
December 2008	Nitrogen, Ammonia (NH3)	7D Conc	4.5	23.7
December 2008	Nitrogen, Ammonia (NH3)	7D Qty	0.19	.35882
January 2009	Nitrogen, Ammonia (NH3)	30D Conc	3.0	38.4
January 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.127	.58138
January 2009	CBOD 5 day	30D Conc	10	21.
January 2009	Nitrogen, Ammonia (NH3)	7D Conc	4.5	38.4
January 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.19	.58138
January 2009	CBOD 5 day	7D Conc	15	21.
February 2009	Nitrogen, Ammonia (NH3)	30D Conc	3.0	41.5
February 2009	Nitrogen, Ammonia (NH3)	30D Qty	0.127	.62831
February 2009	CBOD 5 day	30D Conc	10	14.
February 2009	Nitrogen, Ammonia (NH3)	7D Conc	4.5	41.5
February 2009	Nitrogen, Ammonia (NH3)	7D Qty	0.19	.62831

The mixed liquor was light brown in color (very thin). It is obvious, from the number of nitrogen-ammonia violations shown above, the treatment plant is not functioning properly even though all components appear to be in working order (with exception to one of the sand filters). **In order to accelerate the establishment of biological treatment colonies, a load of mixed liquor seed must be brought in from a publicly owned treatment works as soon as possible, but no later than May 15, 2009. The City of Hillsboro is the closest facility.**

Currently, daily discharge flows are taken from the water meter for the mobile home park. This is an acceptable method (the meter must be read daily). Please be advised that a water meter will not measure extraneous water infiltrating in the sewage collection system during rain events. Pleasant Acres should investigate purchasing an elapsed time meter for the sand filter dosing pumps. This method would be more representative of discharge flow rates.

#### Operator of Record

**The Operator of Record for this facility must submit an "Operator of Record Notification Form" (attached) no later than May 15, 2009.**

#### Record Keeping

There was no "Operator of Record" log book located on-site. 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 May 15, 2009. This log book must meet all the requirements shown above and must be available upon request (typically during an inspection by Ohio EPA).**



### Operator of Record (ORC) Notification Form

Ohio Environmental Protection Agency  
 Division of Drinking and Ground Waters  
 Operator Certification Unit  
 50 West Town St, Suite 700  
 P.O. Box 1049  
 Columbus, OH 43216-1049

Phone: (614) 644-2752  
 1- 866 - 411-OPCT (6728)  
 Fax: (614) 644-2909  
 email: opcert@epa.state.oh.us  
 website: www.epa.state.oh.us/ddagw/opcert.html

#### I. SYSTEM INFORMATION

Name of System: \_\_\_\_\_ Phone Number: \_\_\_\_\_  
 PWS ID/NPDES Permit #: \_\_\_\_\_ STU # \_\_\_\_\_ Classification: \_\_\_\_\_  
 \_\_\_\_\_  
 Name of Facility Owner or Permittee, Title (Print) Facility Owner or Permittee (Signature)

#### II. SYSTEM TYPE (Check only one of the following. Use additional sheets if necessary.)

Public Water System (PWS)	Distribution System	Treatment Works	Collection System

#### III. OPERATOR OF RECORD INFORMATION

Add Additional(A), New (N) or Remove(R)	Name of Operator of Record	Certification Number & Expiration Date	I verify that I am the onsite certified operator responsible for the technical operation of the above referenced facility. (Signature of certified operator)*

\* A signature by an operator of record who is being removed is not required.  
 (Attach additional sheets if necessary.)

Amount of time an ORC spends onsite at the Facility: \_\_\_\_\_

For Internal Use Only	
Reviewed by:	Date of SDWIS update:
Date of Compliance Status Letter:	