



**Environmental  
Protection Agency**

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

June 2, 2011

Mr. Les Bowman, Owner  
Indian Hills MHP  
5888 State Route 36  
Piqua, Ohio 45356

**RE: Indian Hills Reconnaissance Inspection and Notice of Violation, NPDES  
Permit No. 1PV00108\*BD / OH0127361**

Dear Mr. Bowman:

I am writing in follow-up to the May 25, 2011 Reconnaissance Inspection conducted at, Indian Hills Mobile Home Park, Township Road 55, Jefferson Township, Logan County. The inspection was performed as part of the compliance review for the park.

The inspection findings are included in the attached report. There are three items that require a written response. Please provide the requested information by no later than the dates notes.

If you have any questions, please call Mr. Joseph Reynolds at (937) 285-6097.

Sincerely,

Martyn Burt  
Compliance Supervisor  
Division of Surface Water

Enclosure

cc: Logan County Health Department  
Robert Gomez, Winelco Inc.



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00108*BD	OH0127361	5/25/2011	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Indian Hills MHP Township Road 55, Jefferson Township Bellefontaine, Ohio	10:00AM	8/1/2007
	Exit Time	Permit Expiration Date
	10:55AM	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Robert Gomez, Contract Operator	(513) 755 - 8050	
Name, Address and Title of Responsible Official	Phone Number	
Les Bowman, Owner 5888 State Route 36 Piqua, Ohio 45356	(937) 603 - 3456	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	U	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
U	Collection System				

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

See attached report.

Inspector	Reviewer
 Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date 6/2/2011	Date

## Inspection Findings

On Wednesday May 25, 2011 an inspection of the Indian Hills MHP waste water treatment plant was conducted by Joe Reynolds. Robert Gomez, Contract Operator, was present during the inspection. The inspection was conducted as part of a compliance review for the park.

National Pollutant Discharge Elimination System (NPDES) permit number 1PV00108\*BD was issued to the park on July 12, 2007. This permit contains a compliance schedule for conducting a sanitary sewer system evaluation (SSE). All of the compliance dates have passed (conduct SSE- 2/1/2008, submit SSE findings - 3/1/2008, implement SSE finding - 8/1/2008, summary reports 9/1/2008). At this time the extent of the SSE work performed is unknown. Reports on the SSE findings and a summary report were never submitted. It was pointed out during the inspection that risers were added to several manholes.

The waste water system at the park continues to experience problems associated with hydraulic surges. Infiltration and inflow into the collection system has contributed to peak flows that routinely exceed plant design (7,500 gpd). A review of flow data for 2010 and early 2011 revealed the following number of days per month that flows exceed plant design: January - 19 out of 31 days, February - 5 out of 17 days reported, March - 30 out of 30 days, April - 30 out of 30 days, May - 30 out of 31 days, June - 28 out of 30 days, July - 27 out of 31 days, August - 29 out of 31 days, September - 24 out of 30 days, October - 20 out of 31 days, November - 6 out of 30 days, December - 13 out of 31 days, January, 2011 - 6 out of 31 days, February - 16 out of 28 days, and March - 22 out of 30 days.

Extraneous flows are causing plant upsets which have contributed to final effluent violations. A review of electronic discharge monitoring reports from January 2010 through February 2011 revealed the following violations: dissolved oxygen (3), suspended solids (10), CBOD5 (6), chlorine residual (5), fecal coliform (1), and ammonia (3). During the same time period there were (7) code violations, and (71) frequency violations.

This year wet weather and a subsequent high ground water table have intensified the infiltration and inflow problem. The park maintenance staff has been advised to shut the aeration system off during storm events in an attempt to save solids.

## Inspection Findings (cont.)

The sewer riser for the trailer on pad 24 was not connected to the lateral. The pipe lifted free of the lateral when picked up by hand. This is a potential inflow source.

The treatment system consist of the following: trash trap, flow equalization, extended aeration tank, clarification, fixed media filter, dosing tank, two slow surface sand filters, chlorination / dechlorination / post aeration tanks. The old extended aeration system was converted to flow equalization and sludge holding. In late 2010 (November / December) a leak was discovered in the sludge holding tank. This allowed sludge to enter the chlorine contact tank and ultimately the final effluent. Repairs were made immediately upon discovery.

## Facility Inspection

Flow enters the plant (trash trap) by gravity. There was a small amount of grease floating on the tank surface. The trash trap is pumped on a semiannual basis by Kelly's septic. The trap was last pumped in April, 2011. From the trash trap flow enters the equalization tank.

From equalization, flows are pumped to the aeration system. A percentage is returned to equalization.

Two blowers provide air to the aeration system. The blowers are alternated weekly. Although the aeration mixed liquor appeared thin, a sludge blanket was forming.

The clarifier effluent was clear. Fine solids were rising in the tank. Some clumps of solids were noted behind the effluent weir. Chlorine tablets were placed in the weir trough to help control algae.

From clarification waste water enters the fixed media filter splitter box. About an inch of solids covered most of the bottom of the box. The fixed media filter was full of solids that had washed out of aeration. The tank was pumped out in April, but heavy rains caused additional solids to wash out.

## Facility Inspection (cont.)

After the fixed media filter flow enters the sand filter dosing chamber. Plant flows are estimated based upon pump run times. There are two slow surface sand filters. One filter was on-line. Solids were noted on the surface of both filters. Both filters were drained. During heavy storms the filters are bypassed to keep them from blinding and eventually overflowing. Leaks were noted on the distribution box wall and the wall that separates the two filters. Four plastic bins were located beside the filters. Waste solids were leaking out of one of the bins.

From the sand filters flow enters the chlorine contact tank. A tablet feed system is used to introduce chlorine. Post aeration also occurs in this tank. The effluent was clear. Next the waste water enters the dechlorination tank. A tablet dechlorination system is used to remove the chlorine. This tank sits low and contained debris from previous storms. The riser on the tank needs to be sealed.

Final effluent samples are collected after the dechlorination system. The final effluent was clear. The final outfall at the creek is about 125 yards away. We did not visit it today.

Mr. Gomez keeps a log book on-site. The book includes the system identification, dates and times of arrival and departure, identification of person making entries, specific O & M work performed, test results, and maintenance activities performed. Mr. Gomez also has developed a check list for the maintenance person to use.

## Items Requiring a Response

1. In order to bring the park back into compliance with its NPDES permit the district will be working to establish a formalized compliance schedule contained in Directors Final Findings and Orders. You will be contacted as this process evolves. In the interim you should provide any infiltration and inflow findings and reports that were generated as part of previous studies. This information must be submitted by no later than June 27, 2011.
2. The integrity of the slow surface sand filters must be evaluated. The bottom and walls of the filters must be sealed to prevent the migration of waste water from the system. Additionally the waste solids container must be sealed to prevent leakage onto the ground. The findings of this investigation along with any proposed actions must be submitted to this office by no later than July 18, 2011.

## Items Requiring a Response (cont.)

3. In order to eliminate infiltration and inflow of storm water and debris into the dechlorination tank the riser on the tank needs to be sealed. Written verification as to the completion of this work must be provided by no later than July 18, 2011.