

SIGNATURE RECEIVED

4/2/08



State of Ohio Environmental Protection Agency

Central District Office

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

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

CERTIFIED #91 7108 2133 3932 4450 5978

March 28, 2008

George DeGraca
K.D.M. Developement
642 Kreag Rd
Pittsford, NY 14534

FILE COPY

**Re: 4PV00008/OH0070980
Oak Hills Mobile Home Park
NPDES Permit Compliance
Franklin County**

Dear Mr. DeGraca:

Enclosed is the Compliance Inspection Report for the Oak Hills wastewater treatment plant (WWTP). This inspection was conducted on March 25, 2008 by Ohio EPA personnel. The purpose of this inspection was to evaluate the condition and operating capabilities of the WWTP.

At the time of the inspection, the facility was found to be unacceptable. While some progress has been made, the following problems must be addressed. Please respond, in writing, within ten days of receipt of this notification. Your response should include the dates, either actual or proposed, for completion of the action(s).

1. The flow meter was found to be extremely inaccurate, Discontinue its use, and utilize an accurate temporary meter while you determine the best type of permanent meter to install. Once the type of meter is selected, please provide this office with a permit to install application for the meter.
2. The sand filters level of sand is too low for proper operation, please add Ohio EPA approved sand to the appropriate level.
3. Eliminate the illegal by-pass from the sand filters to the chlorine contact tank immediately.
4. Repair the dechlorination unit so that it can operate.
5. Determine all possible flow patterns through the plant and submit the information to this office.

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

George DeGraca
K.D.M. Development
Page -2-

If you have any questions, comments, or concerns, please call me at (614) 728-3847.

Sincerely,



Sheree Gossett-Johnson
Environmental Specialist II
Enforcement and Compliance
Division of Surface Water
Central District Office

Enclosure

c: Wendy Nelson, Manager Oak Hills Mobile Home Park
Gary Benet, Operator /T.C.C.I laboratories
Tom Behlen, AGO

SGJ/nsm Oakhill08

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Mo/Day/Yr	Disp. Typ	Inspector	Watershed
4PV00008	OH0070980	3/25/2008	CEI	S	Darby

Section B: Facility Data

Facility Name:	<u>Oak Hills MHP</u>	Entry Time	Permit Eff. Date
Address:	<u>5965 Harrisburg-Georgesville Rd.</u>	10:30 AM	July 1, 2003
City/State/Zip:	<u>Grove City, Ohio 43123</u>	Exit Time	Permit Exp. Date
		11:30 AM	June 30, 2008

On-Site Representatives

Name: Wendy Nelson
Title: Manager

Phone: 614 877-3500

Responsible Official

Name/Title: George Dagraca
Address: 642 Kreaq Rd, Pittsford NY 14534
Phone:

Section C: Areas Evaluated During Inspection:

(S=Satisfactory, M=Marginal, U=Unsatisfactory, NE=Not-Evaluated)

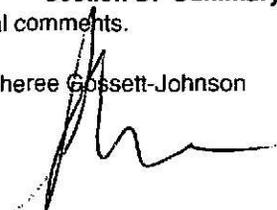
Permit	U	Effluent/ Receiving Waters	M
Records/Reports	S	Sludge Storage/ Disposal	S
Operations & Maintenance	M	Pretreatment	NE
Facility Site Review	S	Compliance Schedules	U
Collection System	NE	Self-Monitoring Program	S
Flow Measurement	U	Other	
Laboratory	NE		

Section D: Summary of Findings/Comments:

See cover letter for additional comments.

Name of Inspector: Sheree Gossett-Johnson

Ohio EPA, Central District Office

Signature: 

Date: 3/27/08

Name of Reviewer: Erin Sherer

Ohio EPA, Central District Office

Signature: 

Date: 3/27/08

USEPA NPDES No.
Ohio NPDES No.

OH0070980
4PV00008

Sections E thru K: Complete on all inspections as appropriate. (N/A - Not Applicable N/E - Not Evaluated)

Section E. Permit Verification

Yes No N/A N/E

INSPECTION OBSERVATIONS VERIFY THE PERMIT

- | | | | | |
|--|---|---|---|---|
| (a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE | X | | | |
| (b) CORRECT NAME AND LOCATION OF RECEIVING WATERS | X | | | |
| (c) PRODUCT(S) AND PRODUCTION RATES (Industrial) | | | | X |
| (d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT | * | X | | |
| (e) TREATMENT PROCESSES ARE IN PERMIT APPLICATION/BRIEFING MEMO | X | | | |
| (f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION | | | X | |
| (g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES | | | | X |
| (h) ALL DISCHARGES ARE PERMITTED | X | | | |
| (i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE IN THE PERMIT | * | X | | |

COMMENTS/STATUS:

See cover letter

Section F. Compliance Schedule and Violations

Yes No N/A N/E

- | | | | | |
|--|----|---|--|--|
| (a) ANY SIGNIFICANT VIOLATIONS SINCE LAST INSPECTION | X | | | |
| (b) PERMITTEE IS TAKING ACTION TO RESOLVE VIOLATIONS | *X | | | |
| (c) PERMITTEE HAS COMPLIANCE SCHEDULE | X | | | |
| (d) COMPLIANCE SCHEDULE CONTAINED : | *X | | | |
| (e) PERMITTEE IS MEETING SCHEDULE OF COMPLIANCE | * | X | | |

COMMENTS/STATUS:

Compliance schedule for disinfection in current NPDES permit not met. Current operator began investigating the chlorination and dechlorination in March of 2008.

Section G. Operation and Maintenance

TREATMENT WORKS:

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

Yes No N/A N/E

- | | | | | |
|---|----|---|--|---|
| (a) STANDBY POWER AVAILABLE: GENERATOR DUAL FEED | * | X | | |
| (b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES | X | | | |
| (c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS | X | | | |
| (d) SUFFICIENT STAFF PROVIDED #SHIFTS DAYS/WK | * | X | | |
| (e) OPERATOR HOLDS UNEXPIRED LISCENSE OF CLASS I: | X | | | |
| (f) ROUTINE AND PREVENTATIVE MAINTENANCE SCHEDULED/PERFORMED ON TIME | *X | | | |
| (g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION | | | | X |
| (h) O&M MANUAL PROVIDED AND MAINTAINED | | | | X |
| (i) ANY PLANT BYPASSES SINCE LAST INSPECTION | *X | | | |
| (j) REG. AGENCY NOTIFIED OF BYPASSES--on MORs 1-800 # | X | | | |
| (k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPECT | X | | | |

COMMENTS/STATUS:

Compliance with the current NPDES began In March of 2008.

Section G. Operation & Maintenance (continued)

	Yes	No	N/A	N/E
COLLECTION SYSTEM:				
(a) PERCENT COMBINED SYSTEM: %				
(b) COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION: CSO SSO				X
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)				X
(d) CSO O&M PLAN PROVIDED AND IMPLEMENTED				X
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT				X
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM				X
(g) LIFT STATION ALARMS PROVIDED AND MAINTAINED	X			
(h) ARE LIFT STATIONS WITH PERMANENT STANDBY POWER OR EQUIV.		X		
(i) ANY INFLOW/INFILTRATION PROBLEM, OR ANY MAJOR REPAIRS TO THE COLLECTION SYSTEM SINCE LAST INSPECTION (SEPARATE SEWER SYSTEM)				X
(j) ANY COMPLAINTS SINCE LAST INSPECTION OF BASEMENT FLOODING			X	
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	X			
COMMENT/STATUS: See cover letter				

Section H. Sludge Management

	Yes	No	N/A	N/E
(a) SLUDGE MANAGEMENT PLAN (SMP)		X		
IF YES, DATE SUBMITTED: APPROVAL #				
(b) SLUDGE MANAGEMENT PLAN CURRENT		X		
(c) SLUDGE ADEQUATELY DISPOSED OF: METHOD-	* X			
(d) IS SLUDGE INCINERATED			X	
IF YES, ASH IS DISPOSED AT:				
(e) IS SLUDGE DISPOSAL CONTRACTED			X	
IF YES, CONTRACTOR NAME:				
(f) HAS AMOUNT OF SLUDGE CHANGED SIGNIFICANTLY SINCE LAST INSPECTION		X		
(g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT	* X			
(h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP			X	
(i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW				X
(j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE	* X			
(k) IS SLUDGE ADEQUATELY PROCESSED (digestion, dewatering, pathogen control)			X	
COMMENTS/STATUS: Actions to attempt compliance with the current NPDES began in March of 2008				

Section I. Self Monitoring Program

Part 1. Flow Measurement

	Yes	No	N/A	N/E
(a) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED *		X		
TYPE OF FLOW MEASURING:				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration):		X		
(c) SECONDARY INST. (totalizer, recorder, etc.) PROPERLY OPERATED & MAINTAINED				X
(d) FLOW MEASURING EQUIP. ADEQUATE FOR EXPECTED RANGES OF FLOWS *		X		
(e) ACTUAL FLOW DISCHARGED IS MEASURED *	X			
(f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY:				
DAILY MONTHLY				
WEEKLY				

Section I. Self Monitoring Program (continued)

Part 2. Sampling

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED IN THE PERMIT	X			
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	X			
(c) PERMITTEE USES REQUIRED SAMPLING METHOD				X
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE				X
(i) SAMPLES REFRIGERATED DURING COMPOSITING				X
(ii) PROPER PRESERVATION TECHNIQUES USED				X
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3				X
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS, INCLUDING ALL ORIGINAL STRIP CHART RECORDS (e.g., continuous monitoring instrumentation, calibration, and maintenance records)				X
(f) ADEQUATE RECORDS MAINTAINED (e.g., sampling date, time, exact location, etc.)				X

COMMENTS/STATUS

Additional sampling has been conducted, beginning in March 2008, to determine the cause of NPDES limit violations

Part 3. Laboratory

	Yes	No	N/A	N/E
(a) EPA APP. ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)				X
(b) IF ALTERNATE PROCEDURES ARE USED, PROPER APPROVAL OBTAINED				X
(c) ANALYSIS PERFORMED MORE FREQUENTLY THAN REQUIRED	X			
(d) IF (c) IS YES, ARE RESULTS RECORDED				
(e) COMMERCIAL LABORATORY USED	X			
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB: <u>All parameters</u>				
(2) LAB NAME: <u>TCCl</u>				
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED				X
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	*	X		
(h) ADEQUATE RECORDS MAINTAINED	*	X		
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE <u>NA</u>				Satisfactory Marginal Unsatisfactory

COMMENTS/STATUS:

See Cover letter