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State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

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Columbus, OH 43216-1049

CERTIFIED #91 7108 2133 3932 4449 8690

June 10, 2009

George DeGraca
K.D.M. Development
642 Kreag Road
Pittsford, NY 14534

Re: 4PV00008/OH0070980
Oak Hills Mobile Home Park
Reconnaissance Inspection
Franklin County

Dear Mr. DeGraca:

On June 2, 2009, a Reconnaissance Compliance Inspection was conducted at the Oak Hills Wastewater Treatment Plant (WWTP). Seth Borland, representing TCCI Laboratory's and myself, met on-site for the inspection.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit. At the time of this inspection, the plant appeared to be operating satisfactorily. Reviews of your monthly operating reports indicate an inflow and infiltration problem. Please correct this problem as soon as possible so that you may connect to the regional sanitary sewer, Darbydale.

This office understands you are currently working with Franklin County Sanitary Engineers office to connect to the Darbydale sanitary sewer system. Please resolve your issues quickly and connect to the Darbydale sanitary sewer system to avoid continued degradation to the Big Darby creek from your wastewater treatment plant discharge.

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

George DeGraca
K.D.M. Development
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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

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

SGJ/nsm Oakhil06109

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit # 4PV00008 NPDES OH0070980 Mo/Day/Yr 6/2/2009 Insp. Type R Inspector S Watershed Darby

Section B: Facility Data

Facility Name: Oak Hills MHP
Address: 5965 Harrisburg-Georgesville Rd.
City/State/Zip: Grove City, Ohio 43123

Entry Time 2:30 AM Permit Eff. Date July 1, 2003
Exit Time 3:30 AM Permit Exp. Date 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)

Table with 4 columns: Category, Status, Description, Status. Rows include Permit (U), Records/Reports (S), Operations & Maintenance (M), Facility Site Review (S), Collection System (NE), Flow Measurement (U), Laboratory (NE).

Section D: Summary of Findings/Comments:

See cover letter for additional comments.

Name of Inspector: Sheree Gössett-Johnson

Ohio EPA, Central District Office

Signature:

Date:

6/6/09

Name of Reviewer: Erin Sherer

Ohio EPA, Central District Office

Signature:

Date:

Erin Sherer

6/6/09

USEPA NPDES No.

OH0070980

Ohio NPDES No.

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:

Excessive Inflow and Infiltration causing plant upsets and effluent violations.

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:

Actions to resolve the I&I is not known.

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 INSPEC X

COMMENTS/STATUS:

USEPA NPDES No.
Ohio NPDES No.

OH0070980
4PV00008

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>TCCI</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