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4/29/10



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State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

Certified Mail #91 7108 2133 3932 4449 5439

April 28, 2010

Mr. Ron Younkin
Greenlawn Mobile Homes
555 Greenlawn Avenue
Columbus, OH 43223

Re: 4PH00005/OH0105902
**Reconnaissance Inspection
Enchanted Acres MHP WWTP
Franklin County**

Dear Mr. Younkin:

This inspection was conducted on April 20, 2010, by Ohio EPA personnel. The purpose of this inspection was to evaluate the condition and operating capabilities of the wastewater treatment plant (WWTP) as well as to offer technical assistance to aid you in eliminating your on-going effluent violations.

At the time of the inspection of the WWTP, the following was found:

1. The biomass within the aeration system was approximately five to six thousand mg/L. A typical biomass for this system would be approximately three thousand mg/L. To maintain such a high biomass on such weak influent indicates that the retention age of the biomass was very long.
2. The settelometer test revealed a very fast settling biomass in the clarifier, commonly referred as "old sludge"
3. The sludge holding was full and scheduled to be removed within the month.

After review of the last year of reported effluent data, the following was found:

1. The flow data indicates your flows were at or above your design flow; please review the attachment. These constant high flows caused the organic nutrients for the biomass to be low.

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



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2. The volumes recorded during the wet months indicate heavy inflow and infiltration of clean water into your WWTP from the collection system.
3. The effluent violations were predominately CBOD5 and TSS, please review attachment.

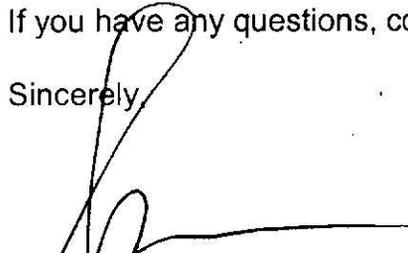
It is obvious that the operator has to constantly "juggle" plant operations to achieve partial compliance. This juggling of operations requires more time devoted by the operator than the size and type of this plant dictates.

Specifically, he has to maintain "old" aeration biomass so that once it entered the clarifier it settle quickly. Quick settling means that even with constant high flows the "old sludge" will not be "pushed" out of the clarifier. This prevents the total suspended solids effluent limit from being exceeded during high flows. Unfortunately, the "old" biomass metabolizes the organic pollutants very slowly, so during lower flows, and thus higher organic nutrient load, CBOD5 would elevate above the effluent limit. To correct the CBOD5 violations, operations would be set to produce younger sludge. During high flows young sludge would be "pushed" out of the clarifier, and TSS effluent limit would be violated. This is the cycle the WWTP operator must constantly juggle due to the excessive inflow and infiltration problem.

This office will put a compliance schedule in your re-newed NPDES permit to correct the inflow and infiltration problems and evaluate plant equipment needs.

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

Sincerely,



Sherde Gossett-Johnson
Environmental Specialist II
Compliance/Enforcement Section
Division of Surface Water

Attachment

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. 4PH00005	NPDES No. OH0036722	Date 04/20/2010	Inspection Type RI	Inspector S	Facility Type 2
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B. FACILITY DATA

Name and Location of Facility Inspected Enchanted Acres Mobile Home Park STP 4510 Parsons Avenue Hamilton Twp, Franklin County, Ohio	Entry Time 1:20 pm	Permit Effective Date 08/01/05
	Exit Time 2:30 pm	Permit Expiration Date 07/31/2010

Name(s) and Title(s) of On-Site Representative(s) Joe Hickman, contract operator	Phone Number(s) 740-814-7342
Name, Address and Title of Responsible Official Ron Younkin, Executive Vice President GTS Investment Co (Greenlawn Mobile Home Sales) 555 Greenlawn Ave. Columbus, Ohio 43223	Phone Number 614-443-7421

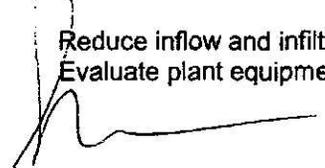
C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>M*</u> Operations & Maintenance	<u>M</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u> </u> Other
<u>N</u> Collection System		

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

D. SUMMARY OF FINDINGS/COMMENTS

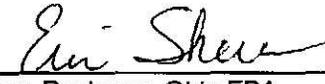
1. Reduce inflow and infiltration to allow the operations to avoid effluent violations.
2. Evaluate plant equipment upgrades to avoid effluent violations.



Sheree Gossett-Johnson, Inspector, Ohio EPA,

Date

4/23/10



Erin Sherer, Reviewer, Ohio EPA,

Date

4/26/10

Violation Date	Parameter	Limit Type	Limit	Reported Value
2/1/2009	CBOD 5 day	30D Conc	10	11.375
2/1/2009	CBOD 5 day	7D Conc	15	15.5
5/1/2009	Total Suspended Solids	30D Conc	12	18.25
5/15/2009	Total Suspended Solids	7D Conc	18	40.
5/15/2009	Total Suspended Solids	7D Qty	6.8	11.3474
5/1/2009	CBOD 5 day	30D Conc	10	10.875
5/15/2009	CBOD 5 day	7D Conc	15	21.5
5/15/2009	CBOD 5 day	7D Qty	5.7	6.19794
5/28/2009	Chlorine, Total Residu	1D Conc	0.038	.2
7/1/2009	Fecal Coliform	30D Conc	1000	3604.93
7/8/2009	Fecal Coliform	7D Conc	2000	6400.
7/15/2009	Fecal Coliform	7D Conc	2000	6100.
1/1/2010	Total Suspended Solids	30D Conc	12	12.5714
1/1/2010	Total Suspended Solids	7D Conc	18	21.
1/8/2010	Total Suspended Solids	7D Conc	18	19.
1/1/2010	CBOD 5 day	30D Conc	10	13.8571
1/1/2010	CBOD 5 day	7D Conc	15	18.5
1/8/2010	CBOD 5 day	7D Conc	15	19.
2/1/2010	Total Suspended Solids	30D Conc	12	14.25
2/1/2010	Total Suspended Solids	7D Conc	18	18.5
2/1/2010	CBOD 5 day	30D Conc	10	15.
2/1/2010	CBOD 5 day	7D Conc	15	15.5
2/15/2010	CBOD 5 day	7D Conc	15	17.5
2/1/2010	CBOD 5 day	30D Qty	3.8	3.9927
3/1/2009	CBOD 5 day	30D Conc	10	10.625
3/1/2010	CBOD 5 day	7D Conc	15	19.