



Environmental
Protection Agency

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

FILE COPY

March 14, 2011

Mr. Bret Yetter
New Dover Properties, LLC
1924 Fuller Road
Colorado Springs, CO 80920

Re: **4PV00014 / OH0102130**
Dover Estates Mobile Home Park
Reconnaissance Inspection
Union County

Dear Mr. Yetter:

On March 2, 2011, a Reconnaissance Inspection was conducted at the New Dover Estates Mobile Home Park in Union County, Ohio. Present for the inspection were John Kincaid, the Operator of Record, Cindy Yetter, the co-owner of the property, Paul Pryor of Union County Health Department, Ron Miller, a Dover Township trustee, and myself of the Ohio EPA, Central District Office, Division of Surface Water. **Due to evidence of raw sewage being discharged on the ground from the trash trap tanks due to high flows, this letter serves as a Notice of Violation.**

Attached is the Reconnaissance Inspection Report. There are a few items which require a written response. **Please respond in writing within 30 days of the receipt of this letter.**

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846.

Sincerely,

Cole Miller
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

CM/nsm New Dover Recon 3-2-2011

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

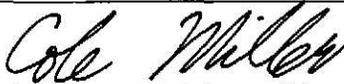
614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4PV00014*ED	OH0102130	3/2/11	R	M	2

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
New Dover Estates Mobile Home Park 11480 US Route 36 Marysville, Ohio 43040	10:00 AM	August 1, 2007
	Exit Time	Permit Expiration Date
	11:30 AM	July 31, 2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
John Kincaid, Contract Operator	(740) 386-3768	
Name and Title of Responsible Official	Phone Number	
Bret Yetter New Dover Properties, LLC 1924 Fuller Rd Colorado Springs, CO 80920	(719) 531-7650	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
S	Records/Reports	
S	Operations & Maintenance	
M	Facility Site Review	The walls of the aeration tank are under construction and piles of dirt pose a tripping hazard.
U	Collection System	A series of rain events overloaded the plant and resulted in overflow of raw sewage onto the ground by the trash trap and one sand filter being ponded.
S	Flow Measurement	
N	Laboratory	
M	Effluent/Receiving Waters	Ammonia effluent violations in July 2010 and August 2008.
S	Sludge Storage/Disposal	
N	Pretreatment	
S*	Compliance Schedule	Some inflow and infiltration work has been done but more is needed.
S	Self-Monitoring Program	

Signatures			
	3/15/11		3/15/11
Cole Miller, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Date	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office	Date

Summary of Findings and Comments New Dover MHP WWTP

General

The New Dover Estates MHP WWTP has a design treatment capacity of 25,000 gpd with a discharge to Dun Run through a field tile. Wet stream process provided at the facility include two trash traps, a flow equalization tank, 25,000 gallons of extended aeration with clarification; two fixed media clarifiers, dosing tank, tertiary sand filters, chlorination and dechlorination. Solids handling consists of a sludge holding tank with decant capabilities.

1. At the time of the inspection, the following general observations were made with the operational practices at the facility:
 - a. A sand filter was overflowing. According to county personnel and Mr. Kincaid, the sand bed had been overflowing since February 20, 2011. Mr. Kincaid sent an e-mail to me on March 3, 2011, indicating that the second sand filter was operational again.
 - b. The aeration tank walls have been under construction since September 2010. The area around the tank is cluttered and poses a safety risk. Mr. Yetter has stated that construction should be completed by May 1. **Please notify this office by e-mail when the work is finished.**
 - c. The plant experiences high flows which result in clogged filters and the turning off the blowers to prevent the solids loss. There were also at least two days in which raw sewage overflowed from the trash trap. This is unacceptable. Mr. Yetter has indicated that flow tests and smoke tests, if needed, would be preformed to reduce inflow and infiltration. **Please provide a schedule of planned milestones within thirty days.**
 - d. There is no permanent marker at the outfall. The permit required a marker to be placed by December 1, 2007. **Please respond with a schedule of posting the marker.**
2. The attached table contains a list of NPDES permit violations for the time period between July 2008 and February 2011. The second table summarizes flow between November 2009 and February 2011. The peak flow rates have decreased some but major storm events can overwhelm the plant. As previously indicated, the plant would benefit from additional inflow and infiltration work.

New Dover Estates MHP Effluent Violations between July 2008 and February 2011						
Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PV00014*ED	August 2008	Nitrogen, Ammonia (NH3)	1D Conc	2.4	2.46	8/5/2008
4PV00014*ED	August 2008	Nitrogen, Ammonia (NH3)	1D Conc	2.4	10.6	8/19/2008
4PV00014*ED	August 2008	Nitrogen, Ammonia (NH3)	30D Conc	1.6	6.53	8/1/2008
4PV00014*ED	August 2008	Nitrogen, Ammonia (NH3)	1D Qty	0.23	.64194	8/19/2008
4PV00014*ED	August 2008	Nitrogen, Ammonia (NH3)	30D Qty	0.15	.41408	8/1/2008
4PV00014*ED	July 2010	Nitrogen, Ammonia (NH3)	1D Conc	2.4	3.14	7/6/2010
4PV00014*ED	July 2010	Nitrogen, Ammonia (NH3)	1D Conc	2.4	6.06	7/20/2010
4PV00014*ED	July 2010	Nitrogen, Ammonia (NH3)	30D Conc	1.6	4.6	7/1/2010
4PV00014*ED	July 2010	Nitrogen, Ammonia (NH3)	1D Qty	0.23	.36699	7/20/2010
4PV00014*ED	July 2010	Nitrogen, Ammonia (NH3)	30D Qty	0.15	.2964	7/1/2010

Flow Rates from November 2009 to February 2011		
	Flow (MGD)	Date
Highest Flow in 2010	0.069	6/6/2010
Highest Flow in 2009	0.076	2/13/2009
Highest Flow in 2008	0.162	6/4/2008
Average Flow	0.0237	