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State of Ohio Environmental Protection Agency

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Certified Mail #91 7108 2133 3932 4449 8188

June 30, 2009

Mr. Gary Northup
Carter's Mobile Home Park
3001 Northup Avenue
South Bloomfield, OH 43103-1080

**Re: Carter's MHP
NPDES permit: 4PV00108**

Dear Mr. Northup:

This letter serves as a cover letter to the Reconnaissance Inspection Report attached to this letter and as a **"Notice of Violation"** for the NPDES permit violations pertaining to the Carter's Mobile Home Park located at 2500 Harrisburg Pike in Columbus, Ohio.

The NPDES permit limit violations are on an attached page. The NPDES permit "Compliance Schedule" violations are addressed in the Reconnaissance Inspection Report and "Attachment". **Be advised that failure to comply with the effluent limitations or to meet the conditions of your NPDES permit "Compliance Schedule" may be cause for enforcement action pursuant to Ohio Revised Code Chapter 6111.**

There are several items in the "Attachment" section of the Reconnaissance Inspection Report which require a written response. Please respond in writing within 30 days of the receipt of this letter/report.

Should you have any questions, call me at 614-728-3846.

Sincerely,



Larry Korecko
Environmental Specialist
Compliance and Enforcement
Division of Surface Water
Central District Office

Enclosure

LK/nsm Carters MHP 4-23 and 6-9-09 RI cover letter

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

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
4PV00108	OH0121258	6-9-09	R	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Carter's Mobile Home Park STP 2500 Harrisburg Pike Columbus, OH		8-1-07
	Exit Time	Permit Expiration Date
		7-31-12

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Bryan McKee -contract operator	740-477-8239
Name, Address and Title of Responsible Official	Phone Number
Gary Northup, Co-owner 4427 Clarke Place, Grove City, OH 43123	539-7200

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/A</u> Laboratory	<u>U*</u> Compliance Schedules
<u>M*</u> Operations & Maintenance	<u>U*</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>M*</u> Facility Site Review	<u>M*</u> Sludge Storage/Disposal	<u> </u> Other
<u>M*</u> Collection System		

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

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

- ~ Provide date when all trailers will be tied into new sanitary sewers you have installed
- ~Provide information asked for in "Attachment" regarding sewer pipe, joint specs, etc.
- ~Provide maps of new sanitary and old sanitary now used as storm sewer
- ~Indicate solids concentration in aeration tank and what levels operator likes to be at.

Larry Korecko
Larry Korecko, Inspector, Ohio EPA, Central District Office

6-30-09
Date

Erin Sherer
Erin Sherer, Reviewer, Ohio EPA, Central District Office

6-30-09
Date

ATTACHMENT

General

The Carter's Mobile Home Park sewage treatment plant consists of trash trap, aeration tank, clarifier, dosing tank, sand filters, and chlorination/dechlorination.

A "Japanese" type of fixed media system was installed in the aeration basin around autumn 2006 to retain bacteria during flows higher than design which cause washout of solids. Also in 2004 a Geysler pump was installed on the return activated sludge line to aid in solids retention.

There continue to be numerous effluent violations from the Carter's MHP sewage treatment plant. The parameter most often violated is ammonia. These violations are in part caused by excessive flows to the sewage treatment plant above its design capacity caused by rain events. It should be pointed out that Carter's is sampling for ammonia more frequently than required by the permit (sampling weekly instead of monthly as called for by permit) to attempt to see if other issues than flow are cause of ammonia problems.

The NPDES permit for Carter's sewage treatment plant has a "Compliance Schedule" which called for a Permit to Install (PTI) application to have been submitted for an equalization tank by December 1, 2007. The equalization (EQ) tank was to have been installed by May 1, 2008. As of June 30, 2009 there has been no submission of a PTI application for an EQ tank nor construction of an EQ tank. This is a serious violation of the NPDES permit.

Collection System

Carter's MHP began replacing sanitary sewer lines in 2004 with the hopes of reducing inflow/infiltration (I/I) to a point that the sewage plant could operate within permit limits. As of June 30, 2009 all the sanitary sewer lines have been replaced and hooked up to all but three trailers. **Please commit a date as to when these trailers will be hooked up to the new sanitary sewer. Since this sewer installation replacement was done without a Permit to Install, provide the type of pipe used, joint specifications, and the type of bedding used. Were any deflection tests or pressure tests conducted on the new sewer line? Were any manholes constructed? Do you have a map detailing the new sanitary sewer lines? If so, please provide a copy.**

This inspector was told that the old sanitary sewer lines would now serve as storm sewers. Do you have a map of these showing where these "storm sewers" now outlet? **Please provide a copy of this map or maps.**

Plant flows were examined for the years 2006, 2007, 2008, and through May 2009. The following table gives a brief analysis of findings:

Flows at Carter's MHP sewage treatment plant

Year	# days flow over 11,000 gpd	# days flow over 20,000 gpd
2006	43	19
2007	56	7
2008	57	3
2009(through May)	20	3

Ohio EPA sent Carter's MHP a "Notice of Violation" dated March 26, 2009 for missing all milestones in its compliance schedule for an equalization tank.

A meeting was held on April 20, 2009 at Ohio EPA with Sam Condo a consultant/sales rep for Geysler Pump Tech. Co. to hear his proposal for an equalization tank for Carter's MHP. A different consultant had proposed an equalization tank of 20,000 gallons and estimated cost of \$45,000. Carter's MHP personnel considered this too large and too expensive. Mr. Condo proposed using the existing 3,500 gallon sludge holding tank as an EQ tank and constructing a new 1,000 gallon sludge holding tank. A "desludger" system was also proposed which was to limit solids in the system and prevent a big wash-out. Ohio EPA pointed out that there were still several days with flows over 20,000 gallons per day and considerably more with flows over 15,000 gallons per day. Mr. Condo said that those occasions were rare and the system he proposed would help smaller flows.

An inspection of the Carter's MHP sewage treatment plant and collection system on April 24, 2009 found that new sanitary sewer lines were being installed on the final 7 trailers in the northeast corner of the MHP.

Back in 1999 Ohio EPA approved a PTI and plans that indicated that a sewage pump station located in the south-central portion of the park would be converted to an equalization tank. Park personnel stated that this was attempted but that it did not work. Not enough trailers drained into it and there were problems with the tank leaking and connecting it to the main sewage plant. Therefore it did not work and its use was stopped. New sanitary sewers now make this tank unnecessary and also the concrete is so bad that a portion of the tank has collapsed. Park personnel would like to destroy the tank.

It also appears that the amount of solids in the aeration tank is so small that this may be inhibiting ammonia reduction. **Please comment on this. Also, have you tried using any type of product that claims to be able to increase the numbers of bacteria that break down ammonia?**

Effluent violations

There have been numerous violations of permit limitations. These are listed on an attached page.

Compliance Schedule

There have been compliance schedule violations which have persisted since the first milestone of submitting a PTI application for an equalization basin was missed on December 1, 2007.

1

CARTERS MHP

Get New Data

VIOLATIONS JANUARY 2008 THROUGH MAY 2009

Permit No.	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	11.5025	1/1/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.32779	1/1/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.61	1/2/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	10.4	1/9/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.31334	1/9/2008
4PV00108*CD	January 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.65	1/9/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	12.2	1/16/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.32416	1/16/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	17.8	1/23/2008
4PV00108*CD	January 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.50462	1/23/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	15.8725	2/1/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.64478	2/1/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.19	2/6/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.26873	2/6/2008
4PV00108*CD	February 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.43	2/6/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	17.7	2/13/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.65856	2/13/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	15.9	2/20/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.53501	2/20/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	23.7	2/27/2008
4PV00108*CD	February 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	1.11682	2/27/2008
4PV00108*CD	March 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	6.15	3/1/2008
4PV00108*CD	March 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.25648	3/1/2008
4PV00108*CD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	13.6	3/12/2008
4PV00108*CD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.57653	3/12/2008
4PV00108*CD	March 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.81	3/12/2008
4PV00108*CD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	7.98	3/26/2008
4PV00108*CD	March 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.26852	3/26/2008
4PV00108*CD	April 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.408	4/1/2008
4PV00108*CD	April 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.12177	4/1/2008
4PV00108*CD	April 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.96	4/2/2008
4PV00108*CD	April 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.24273	4/2/2008
4PV00108*CD	April 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	8.82	4/30/2008

4PV00108*CD	April 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.29678	4/30/2008
4PV00108*CD	May 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.	5/1/2008
4PV00108*CD	May 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.07086	5/1/2008
4PV00108*CD	May 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	2.	5/7/2008
4PV00108*CD	May 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.07086	5/7/2008
4PV00108*CD	May 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	2.	5/7/2008
4PV00108*CD	May 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.38	5/14/2008
4PV00108*CD	June 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	3.84667	6/1/2008
4PV00108*CD	June 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.14211	6/1/2008
4PV00108*CD	June 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	1.74	6/4/2008
4PV00108*CD	June 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.09247	6/4/2008
4PV00108*CD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	4.19	6/4/2008
4PV00108*CD	June 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.33	6/10/2008
4PV00108*CD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.87	6/10/2008
4PV00108*CD	June 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	9.51	6/25/2008
4PV00108*CD	June 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.32	6/25/2008
4PV00108*CD	June 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.48	6/25/2008
4PV00108*CD	July 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.802	7/1/2008
4PV00108*CD	July 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.06129	7/1/2008
4PV00108*CD	July 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.51	7/3/2008
4PV00108*CD	July 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	3.65	7/9/2008
4PV00108*CD	July 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.10997	7/9/2008
4PV00108*CD	July 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	3.3	7/23/2008
4PV00108*CD	July 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.1344	7/23/2008
4PV00108*CD	July 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	7/23/2008
4PV00108*CD	July 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.07	7/30/2008
4PV00108*CD	August 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.07	8/6/2008
4PV00108*CD	August 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.14	8/27/2008
4PV00108*CD	September 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	1.265	9/1/2008
4PV00108*CD	September 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	3.76	9/10/2008
4PV00108*CD	September 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.09322	9/10/2008
4PV00108*CD	September 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.07	9/10/2008
4PV00108*CD	September 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.1	9/16/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	2.41	10/1/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	4.432	10/1/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.04	.10884	10/1/2008
4PV00108*CD	October 2008	001	80082	CBOD 5 day	30D Conc	10	11.	10/1/2008

3

4PV00108*CD	October 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.11	10/1/2008
4PV00108*CD	October 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	10/8/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	5.5	10/15/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.13635	10/15/2008
4PV00108*CD	October 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	2.51	10/15/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	9.09	10/22/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.24153	10/22/2008
4PV00108*CD	October 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.08	10/22/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	4.88	10/29/2008
4PV00108*CD	October 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.06	.12098	10/29/2008
4PV00108*CD	October 2008	001	50060	Chlorine, Total Residu	1D Conc	0.019	.08	10/29/2008
4PV00108*CD	December 2008	001	00530	Total Suspended Solids	30D Conc	12	14.	12/1/2008
4PV00108*CD	December 2008	001	00530	Total Suspended Solids	30D Qty	0.45	.64131	12/1/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.66	12/1/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.19994	12/1/2008
4PV00108*CD	December 2008	001	80082	CBOD 5 day	30D Conc	10	10.5	12/1/2008
4PV00108*CD	December 2008	001	80082	CBOD 5 day	30D Qty	0.38	.46327	12/1/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.56	12/3/2008
4PV00108*CD	December 2008	001	00530	Total Suspended Solids	1D Conc	18	19.	12/10/2008
4PV00108*CD	December 2008	001	00530	Total Suspended Solids	1D Qty	0.68	1.04349	12/10/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	8.06	12/10/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.44266	12/10/2008
4PV00108*CD	December 2008	001	80082	CBOD 5 day	1D Qty	0.57	.71396	12/10/2008
4PV00108*CD	December 2008	001	00300	Dissolved Oxygen	1D Conc	6.0	5.68	12/23/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.07	12/30/2008
4PV00108*CD	December 2008	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.31177	12/30/2008
4PV00108*CD	January 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	3.43	1/1/2009
4PV00108*CD	February 2009	001	00530	Total Suspended Solids	30D Conc	12	13.	2/1/2009
4PV00108*CD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.01	2/4/2009
4PV00108*CD	February 2009	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.21699	2/11/2009
4PV00108*CD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.2	2/11/2009
4PV00108*CD	February 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.48	2/25/2009
4PV00108*CD	March 2009	001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.485	3/1/2009
4PV00108*CD	March 2009	001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.11	.1257	3/1/2009
4PV00108*CD	March 2009	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	4.85	3/4/2009
4PV00108*CD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.65	3/4/2009
4PV00108*CD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.84	3/11/2009

4

4PV00108*CD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.66	3/18/2009
4PV00108*CD	March 2009	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	11.3	3/25/2009
4PV00108*CD	March 2009	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.30025	3/25/2009
4PV00108*CD	March 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	3.44	3/25/2009
4PV00108*CD	April 2009	001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	8.79	4/1/2009
4PV00108*CD	April 2009	001	00610	Nitrogen, Ammonia (NH3	1D Qty	0.17	.28013	4/1/2009
4PV00108*CD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	4.28	4/1/2009
4PV00108*CD	April 2009	001	00300	Dissolved Oxygen	1D Conc	6.0	5.05	4/8/2009
4PV00108*CD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	.05	5/6/2009
4PV00108*CD	May 2009	001	50060	Chlorine, Total Residu	1D Conc	0.019	.06	5/14/2009

Carter's MNP
AMMONIA IN EFFLUENT

