



Environmental  
Protection Agency

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

March 8, 2011

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

Re: **4PV00108/OH012158**  
**Carter's MHP WWTP**  
**Reconnaissance Inspection**  
**Franklin County**

Dear Mr. Northup:

On March 1, 2011, a Reconnaissance Inspection was conducted for the Carter's MHP wastewater treatment plant (WWTP) located at 2500 Harrisburg Pike, Jackson Township, Franklin County, Ohio. Present for the inspection were Bryan McKee, an operator, Patrick McGrath and Joe Harrod of Columbus Public Health, and myself of the Ohio EPA, Central District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. **There have been numerous effluent violations and therefore, this report also serves as a Notice of Violation of your wastewater discharge permit for this facility.**

For the effluent violation review done between October 2009 and February 2011, the Carter's MHP was on our significant non-compliance list for fecal coliform, residual chlorine, and ammonia violations. Significant non-compliance is obtained in a variety of ways, such as effluent violations exceeding 40 percent in two months out of a six month period or violations of any monthly limit in four months out of a six month period. Facilities in significant non-compliance are put on a list which is reviewed by Ohio EPA and U.S. EPA. If the facility is unable to meet its permit limits and if Ohio EPA does not take enforcement action, U.S. EPA can choose to issue its own enforcement action. A facility must achieve compliance with the permit limits for three consecutive months to be taken off the list.

Carter's MHP has habitually been in significant non-compliance with permit effluent limits. Between July and December of 2007 and 2008, Carter's MHP was in significant non-compliance for ammonia and residual chlorine violations. The facility made modifications and the operator now adds lime to the aeration tank, operates the aeration tank at higher mixed liquor levels during the winter, and also has installed fixed media in the aeration tanks. Through the winter, Carter's MHP has not been in violation of ammonia limits. The operator also plans on modifying the dechlorination device to allow longer contact time. If this does not correct the problem, I recommend researching ultra violet decontamination technology to eliminate chlorine and reduce fecal coliform violations. Continued non-compliance is unacceptable.

Mr. Gary Northup  
Carter's Mobile Home Park  
Page -2-

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

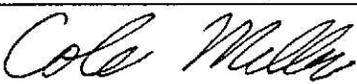
CM/nsm Carters Recon Inspection 2-28-11

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
4PV00108	OH012158	3/1/11	R	M	2

SECTION B: FACILITY DATA		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Carter's MHP 2500 Harrisburg Pike Grove City, Ohio 43123	10:00 AM	8/1/07
	Exit Time	Permit Expiration Date
	11:00 AM	7/31/12
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bryan McKee - Operator	(740) 477-8239	
Name and Title of Responsible Official	Phone Number	
Gary Northup, Co-owner 4427 Clarke Place Grove City, Ohio 43213	(614) 539-7200	

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	Permit	
S	Records/Reports	
S	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
N	Laboratory	
U	Effluent/Receiving Waters	The facility has habitually been in significant non-compliance.
S	Sludge Storage/Disposal	
N	Pretreatment	
N	Compliance Schedule	
S	Self-Monitoring Program	

Signatures			
	3-8-11		3-3-11
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 Carter's MHP WWTP

### General

The Carter's Mobile Home Park sewage treatment plant consists of trash trap, aeration tank, clarifier, dosing tank, sand filters, chlorination, dechlorination and post-aeration. The permitted flow rate is 10,000 GPD.

1. At the time of the inspection, the following general observations were made with the operation and maintenance of the plant:
  - a. The operator indicated that the MLSS was at levels around 4500 mg/L. The sludge settled slowly but the operator is in the process of wasting sludge.
  - b. The splitter box to the sand filters was not completely sealed and the resting sand bed was receiving flow. Although it was indicated that it was not an operational problem, I recommend researching a replacement plug. **Please comment on this.**
  - c. The flow is measured at the dosing tanks. Do you check the accuracy of the pump? If so, how often? **Please comment on this.**
  - d. There is no permanent marker at the outfall. The permit required the marker to be posted by December 1, 2007. **Please respond with a schedule of posting the marker.**
  - e. There appears to be more than one maintenance book for the facility. I would suggest having one maintenance book located on-site at the facility. **Please comment on this.**
2. The attached table contains a list of NPDES permit violations for the time period between October 2009 and February 2011. The second table summarizes flow during the same time period. The peak flow was over four times the design rate. **Please check your records to determine if the reported flow in May 7, 2010, is correct.** As is, the facility would likely benefit from additional I&I work.
3. The following changes have been made since the last inspection:
  - a. The former WWTP was properly abandoned and demolished..
  - b. Fixed media was added to the aeration tanks.
  - c. Lime is added to the aeration tanks. How much is added and how regularly is it added? **Please comment on this.**
4. The effluent from the outfall looked clear.

Carter's MHP Effluent Violations October 1, 2009 - February 1, 2011					
Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2009	Chlorine, Total Residu	1D Conc	0.019	.06	10/7/2009
October 2009	Chlorine, Total Residu	1D Conc	0.019	.08	10/28/2009
November 2009	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.9625	11/1/2009
November 2009	Nitrogen, Ammonia (NH3	30D Qty	0.11	.12746	11/1/2009
November 2009	Nitrogen, Ammonia (NH3	1D Conc	4.5	9.77	11/18/2009
November 2009	Nitrogen, Ammonia (NH3	1D Qty	0.17	.24222	11/18/2009
November 2009	Nitrogen, Ammonia (NH3	1D Conc	4.5	10.	11/24/2009
November 2009	Nitrogen, Ammonia (NH3	1D Qty	0.17	.26571	11/24/2009
February 2010	Nitrogen, Ammonia (NH3	30D Conc	3.0	15.77	2/1/2010
February 2010	Nitrogen, Ammonia (NH3	30D Qty	0.11	.52132	2/1/2010
February 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	18.7	2/3/2010
February 2010	Nitrogen, Ammonia (NH3	1D Qty	0.17	.46361	2/3/2010
February 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	15.3	2/10/2010
February 2010	Nitrogen, Ammonia (NH3	1D Qty	0.17	.53973	2/10/2010
February 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	23.4	2/17/2010
February 2010	Nitrogen, Ammonia (NH3	1D Qty	0.17	.87063	2/17/2010
February 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	5.68	2/24/2010
February 2010	Nitrogen, Ammonia (NH3	1D Qty	0.17	.21133	2/24/2010
March 2010	Nitrogen, Ammonia (NH3	30D Conc	3.0	5.55	3/1/2010
March 2010	Nitrogen, Ammonia (NH3	30D Qty	0.11	.15976	3/1/2010
March 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.46	3/3/2010
March 2010	Nitrogen, Ammonia (NH3	1D Qty	0.17	.17165	3/3/2010
March 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	4.64	3/10/2010
April 2010	Nitrogen, Ammonia (NH3	30D Conc	3.0	16.7	4/1/2010
April 2010	Nitrogen, Ammonia (NH3	30D Qty	0.11	.41402	4/1/2010
April 2010	Nitrogen, Ammonia (NH3	1D Conc	4.5	16.7	4/21/2010
April 2010	Nitrogen, Ammonia (NH3	1D Qty	0.17	.41402	4/21/2010
May 2010	Chlorine, Total Residu	1D Conc	0.019	.14	5/12/2010
May 2010	Chlorine, Total Residu	1D Conc	0.019	.39	5/26/2010
June 2010	Chlorine, Total Residu	1D Conc	0.019	.05	6/9/2010
July 2010	Fecal Coliform	30D Conc	1000	1640.	7/1/2010
July 2010	Chlorine, Total Residu	1D Conc	0.019	.1	7/7/2010
July 2010	Chlorine, Total Residu	1D Conc	0.019	.07	7/14/2010
July 2010	Chlorine, Total Residu	1D Conc	0.019	.08	7/28/2010
August 2010	Fecal Coliform	30D Conc	1000	2420.	8/1/2010
August 2010	Fecal Coliform	1D Conc	2000	2420.	8/11/2010
August 2010	Chlorine, Total Residu	1D Conc	0.019	.1	8/18/2010
September 2010	Chlorine, Total Residu	1D Conc	0.019	.35	9/8/2010
September 2010	Chlorine, Total Residu	1D Conc	0.019	.08	9/15/2010
October 2010	Chlorine, Total Residu	1D Conc	0.019	.05	10/20/2010
October 2010	Chlorine, Total Residu	1D Conc	0.019	.38	10/27/2010

Flow rates for Carter's MHP Oct. 2009 - Feb. 2011		
	Flow (MGD)	Date
Highest Flow	0.03276	5/7/2010
Second Highest Flow	0.0119	11/25/2010
Average	0.0079	