

4P/00110C



State of Ohio Environmental Protection Agency

FILE COPY

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P.O. Box 1049
Columbus, OH 43216-1049

June 14, 2010

John Francisco, Jr.
Hayden Heights MHP
P.O. Box 20434
Columbus, OH 43220

Dear Mr. Francisco:

Attached is a Report for a Reconnaissance Inspection that Sheree-Gossett Johnson and I from this office performed May 25, 2010 at the wastewater treatment plant (WWTP) serving your facility. This report also serves as a Notice of Violation of your wastewater discharge permit for this facility.

Effluent limitation violations for the period of time extending from May 1, 2009 through April 30, 2010 are included in Attachment "A" of this report. Failure to very soon provide consistent wastewater discharge permit compliance will leave this office no choice but to initiate enforcement action in response to the extensive history of violations at this facility.

During our inspection it was good to meet you, Richard Mentzer your maintenance supervisor and Pat Hickman the WWTP operator. It was good to hear that work is underway to provide consistent compliance. Infiltration/Inflow sources of surface/groundwater into the sanitary sewer collection system are being reduced. Also, post aeration of wastewater discharged from the WWTP will be installed and operational by August 1, 2010. Please advise this office in writing within seven days completion of the post aeration project.

If there are questions I can be reached by e-mail at jan.rice@epa.ohio.gov or by telephone at 614-728-3850.

Sincerely,

Jan A. Rice
Environmental Specialist
Field Operations Unit
Division of Surface Water
Central District Office

c: Pat Hickman

JAR/nsm Hayden Heights MHP 5-25-10 Ricovellr

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 |
|-------------|-----------|---------|-----------------|-----------|---------------|
| 4PV00110*BD | OH0136051 | 5/25/10 | R | S | 2 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|--|------------|------------------------|
| John Francisco Jr. dba Hayden Heights MHP WWTP 5501 Cosgray Road, Amlin, Ohio 43002 | 10:30 A.M. | 2/1/09 |
| | Exit Time | Permit Expiration Date |
| | 11:30 A.M. | 1/31/14 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|--|------------------|
| John Francisco Jr., Owner | (o) 614-451-2899 |
| Richard Mentzer, Maintenance Manager | |
| Pat Hickman, WWTP Operator of Record | (c) 614-578-6203 |
| Name(s) Address and Title(s) of Operator of Record | Phone Number(s) |
| Pat Hickman, Operator of Record | (c) 614-578-6203 |
| Name, Address and Title of Responsible Official | Phone Number |
| John Francisco Jr., Owner, Hayden Heights Mobile Home Park, P.O. Box 20434, Columbus, Ohio, 43220 | 614-451-2899 |

C. AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

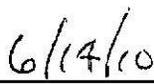
| | |
|-----|---|
| S | Permit |
| N/M | Records/Reports - the Ohio EPA e-DMR reporting system shows no data for May, 2009. The permittee must submit that information to Ohio EPA as soon as possible. |
| S | Operations & Maintenance - sand filter beds will be cleaned in June, 2010. Biosolids contaminated sand removed from the filters must be disposed in a landfill. |
| S | Facility Site Review |
| M | Collection System - Burgess & Niple consulting engineers inspected the collection system to determine inflow/infiltration sources of surface/groundwater into the system. The WWTP operator of record has been working to remove I/I sources referenced in the I/I report. |
| S | Flow Measurement - the operator indicated that he will be rechecking the pump elapsed time meters and pump draw down times to confirm flow monitoring accuracy. |
| N | Laboratory |
| U/N | Effluent/Receiving Waters - effluent limitation and frequency monitoring violations are listed in Attachment "A". Continued violations are unacceptable. Post aeration of wastewater discharged from the WWTP will be installed and operational by August 1, 2010 to resolve dissolved oxygen violations. |
| S | Sludge Storage/Disposal - liquid sludge is hauled to the City of Columbus WWTP. |
| N | Pretreatment |
| N | Compliance Schedules |
| N | Self-Monitoring Program |

D. SUMMARY OF FINDINGS/COMMENTS: This MHP and WWTP were constructed in the early 1970s. In the past, excessive I/I into the collection system contributed to permit noncompliance. I/I sources have been investigated and are in the process of being removed by the permittee. This work should help provide consistent permit compliance. The operator intends installing post aeration of the final effluent which should further improve consistent permit compliance.

The noncompliance history for this WWTP is extensive. Failure by the permittee to very soon provide consistent wastewater discharge permit compliance will leave this office no choice but to initiate enforcement action in response to violations.



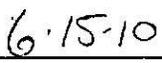
Jan Rice, Inspector, Ohio EPA, Central District Office



Date



Erin Sherer, Reviewer, Ohio EPA, Central District Office



Date

Attachment "A"
 Hayden Heights MHP
 Effluent limitation violations
 5/1/09 - 4/30/10

| Permit No | Reporting Period | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|---------|----------------|------------------------|------------|-------|----------------|----------------|
| 4PV00110*BD | June 2009 | 001 | 31616 | Fecal Coliform | 30D Conc | 1000 | 6100. | 6/1/2009 |
| 4PV00110*BD | June 2009 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 6100. | 6/1/2009 |
| 4PV00110*BD | June 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.3 | 6/4/2009 |
| 4PV00110*BD | June 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 2.8 | 6/11/2009 |
| 4PV00110*BD | June 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.9 | 6/18/2009 |
| 4PV00110*BD | June 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.6 | 6/26/2009 |
| 4PV00110*BD | July 2009 | 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 13.5 | 7/1/2009 |
| 4PV00110*BD | July 2009 | 001 | 31616 | Fecal Coliform | 30D Conc | 1000 | 6100. | 7/1/2009 |
| 4PV00110*BD | July 2009 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 6100. | 7/1/2009 |
| 4PV00110*BD | July 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 2.8 | 7/6/2009 |
| 4PV00110*BD | July 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4. | 7/13/2009 |
| 4PV00110*BD | July 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 2.7 | 7/20/2009 |
| 4PV00110*BD | July 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.2 | 7/27/2009 |
| 4PV00110*BD | August 2009 | 001 | 31616 | Fecal Coliform | 30D Conc | 1000 | 10000. | 8/1/2009 |
| 4PV00110*BD | August 2009 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 10000. | 8/1/2009 |
| 4PV00110*BD | August 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.9 | 8/3/2009 |
| 4PV00110*BD | August 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.9 | 8/10/2009 |
| 4PV00110*BD | August 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.2 | 8/17/2009 |
| 4PV00110*BD | August 2009 | 001 | 00400 | pH | 1D Conc | 6.5 | 6.3 | 8/24/2009 |
| 4PV00110*BD | August 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.1 | 8/24/2009 |
| 4PV00110*BD | August 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.9 | 8/31/2009 |
| 4PV00110*BD | September 2009 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 30D Conc | 1.0 | 1.25 | 9/1/2009 |
| 4PV00110*BD | September 2009 | 001 | 00610 | Nitrogen, Ammonia (NH3 | 7D Conc | 1.5 | 2.1 | 9/1/2009 |
| 4PV00110*BD | September 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.1 | 9/7/2009 |
| 4PV00110*BD | September 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.6 | 9/14/2009 |
| 4PV00110*BD | September 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.8 | 9/21/2009 |

Table 1.

Attachment "A"
 Hayden Heights MHP
 Effluent limitation violations
 5/1/09 - 4/30/10

| Permit No | Reporting Period | Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|---------|----------------|------------------------|------------|-------|----------------|----------------|
| 4PV00110*BD | October 2009 | 001 | 00530 | Total Suspended Solids | 30D Conc | 12 | 19.25 | 10/1/2009 |
| 4PV00110*BD | October 2009 | 001 | 00530 | Total Suspended Solids | 7D Conc | 18 | 32. | 10/1/2009 |
| 4PV00110*BD | October 2009 | 001 | 00530 | Total Suspended Solids | 7D Qty | 2.7 | 3.45192 | 10/1/2009 |
| 4PV00110*BD | October 2009 | 001 | 31616 | Fecal Coliform | 30D Conc | 1000 | 3600. | 10/1/2009 |
| 4PV00110*BD | October 2009 | 001 | 31616 | Fecal Coliform | 7D Conc | 2000 | 3600. | 10/1/2009 |
| 4PV00110*BD | October 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.4 | 10/5/2009 |
| 4PV00110*BD | October 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.7 | 10/12/2009 |
| 4PV00110*BD | October 2009 | 001 | 00530 | Total Suspended Solids | 7D Conc | 18 | 25. | 10/15/2009 |
| 4PV00110*BD | October 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5. | 10/19/2009 |
| 4PV00110*BD | October 2009 | 001 | 00400 | pH | 1D Conc | 6.5 | 6.3 | 10/26/2009 |
| 4PV00110*BD | October 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 3.7 | 10/26/2009 |
| 4PV00110*BD | November 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.7 | 11/9/2009 |
| 4PV00110*BD | December 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.8 | 12/14/2009 |
| 4PV00110*BD | December 2009 | 001 | 00400 | pH | 1D Conc | 6.5 | 6.3 | 12/21/2009 |
| 4PV00110*BD | December 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.3 | 12/21/2009 |
| 4PV00110*BD | December 2009 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.9 | 12/28/2009 |
| 4PV00110*BD | January 2010 | 001 | 00400 | pH | 1D Conc | 6.5 | 6.1 | 1/11/2010 |
| 4PV00110*BD | January 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.3 | 1/11/2010 |
| 4PV00110*BD | January 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.7 | 1/18/2010 |
| 4PV00110*BD | January 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.6 | 1/25/2010 |
| 4PV00110*BD | February 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.9 | 2/1/2010 |
| 4PV00110*BD | February 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.7 | 2/8/2010 |
| 4PV00110*BD | February 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.7 | 2/15/2010 |
| 4PV00110*BD | February 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.9 | 2/22/2010 |
| 4PV00110*BD | March 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.7 | 3/1/2010 |
| 4PV00110*BD | March 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 4.8 | 3/8/2010 |
| 4PV00110*BD | April 2010 | 001 | 00300 | Dissolved Oxygen | 1D Conc | 6.0 | 5.3 | 4/19/2010 |

Table 1.

Attachment "A"
 Hayden Heights MHP
 Monitoring Frequency Violations
 5/1/09 - 4/30/10

| Permit No | Reporting Period | Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported | Violation Date |
|-------------|------------------|---------|----------------|------------------------|------------------|----------|----------|----------------|
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/01/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/02/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/03/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/05/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/06/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/07/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/08/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/09/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/10/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/11/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/12/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/13/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/14/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/15/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/16/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/17/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/19/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/20/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/21/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/22/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/23/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/24/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/25/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/26/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/27/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/28/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/29/2009 |
| 4PV00110*BD | June 2009 | 001 | 50060 | Chlorine, Total Residu | 1/Day | 1 | 0 | 06/30/2009 |

Table 2.