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State of Ohio Environmental Protection Agency

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CERTIFIED #91 7108 2133 3932 4449 4609

July 23, 2010

George DeGraca
K.D.M. Development
642 Kreag Rd
Pittsford, NY 14534

**Re: 4PV00008/OH0070980
Oak Hills Mobile Home Park WWTP
Compliance Inspection
Franklin County**

Dear Mr. DeGraca:

Enclosed is the Compliance Inspection Report for the Oak Hills wastewater treatment plant (WWTP). This inspection was conducted on July 12, 2010 by Ohio EPA personnel. The purpose of this inspection was to evaluate the condition and operating capabilities of the WWTP.

At the time of the inspection, the facility equipment was found to be unacceptable. During wet weather (to avoid sewage overflows from the sand filters the operator must haul raw sewage to another wastewater treatment plant for treatment. In addition, the sludge holding tank does not provide adequate capacity forcing the operator to haul to another wastewater treatment plant quite often. Due to a lack of plant capacity with respect to raw sewage and sludge, the number of hours the operator must use operating this plant is excessive and very costly to you.

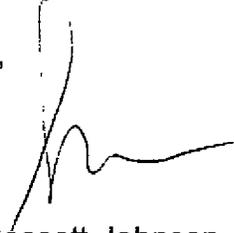
To permanently correct the by-passing and a host of other violations, the Parks sewage needs to be conveyed to the Darbydale WWTP for treatment and the Park WWTP to be taken off-line. Until the connection to Darbydale WWTP has been completed, please contract with an operator to provide twenty-four hour operational surveillance. With additional surveillance, the by-passes that occur outside the forty hours per week shall be prevented.

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

George DeGraca
K.D.M. Development
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If you have any questions, comments, or concerns, please call me at (614) 728-3847.

Sincerely,



Sheree Gossett-Johnson
Environmental Specialist II
Enforcement and Compliance
Division of Surface Water
Central District Office

Enclosure

c: Wendy Nelson, Manager Oak Hills Mobile Home Park
Gary Benett, Operator /T.C.C.I laboratories
David Doko, AGO

SGJ/nsm Oakhill July 10, 2010

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit #	NPDES	Mo/Day/Yr	Insp. Type	Inspector	Watershed
4PV00008	OH0070980	7/12/2010	R	S	Darby

Section B: Facility Data

Facility Name:	<u>Oak Hills MHP</u>	Entry Time	Permit Eff. Date
Address:	<u>5965 Harrisburg-Georgesville Rd.</u>	^2:30 pm	July 1, 2003
City/State/Zip:	<u>Grove City, Ohio 43123</u>	Exit Time	Permit Exp. Date
		^3:30 pm	June 30, 2008

On-Site Representatives

Name: Wendy Nelson
 Title: Manager

Phone: 614 877-3500

Responsible Official

Name/Title: George Dagraca
 Address: 642 Kreeg Rd, Pittsford NY 14534
 Phone:

Section C: Areas Evaluated During Inspection:
(S=Satisfactory, M=Marginal, U=Unsatisfactory, NE=Not-Evaluated)

Permit	U	Effluent/ Receiving Waters	M
Records/Reports	S	Sludge Storage/ Disposal	U
Operations & Maint.	M	Pretreatment	NE
Facility Site Review	S	Compliance Schedules	NE
Collection System	NE	Self-Monitoring Program	S
Flow Measurement	M	Other	
Laboratory	NE		

Section D: Summary of Findings/Comments:

See cover letter.

Name of Inspector: Sheree Gossett-Johnson

Signature:

Ohio EPA, Central District Office

Date:

7/15/10

Name of Reviewer: Erin Sherer

Signature:

Ohio EPA, Central District Office

Date:

7/16/10

Sections E thru K: Complete on all inspections as appropriate. (N/A - Not Applicable N/E - Not Evaluated)

Section E. Permit Verification

	Yes	No	N/A	N/E
INSPECTION OBSERVATIONS VERIFY THE PERMIT				
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	X			
(b) CORRECT NAME AND LOCATION OF RECEIVING WATERS	X			
(c) PRODUCT(S) AND PRODUCTION RATES (Industrial)				X
(d) FLOWS AND LOADINGS CONFORM WITH NPDES PERMIT	*	X		
(e) TREATMENT PROCESSES ARE IN PERMIT APPLICATION/BRIEFING MEMO	X			
(f) NEW TREATMENT PROCESS(ES) ADDED SINCE LAST INSPECTION		X		
(g) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES				X
(h) ALL DISCHARGES ARE PERMITTED		X		
(i) NUMBER AND LOCATION OF DISCHARGE POINTS ARE IN THE PERMIT	*	X		

COMMENTS/STATUS:

Sanitary Sewer Overflows have been averted by Hauling raw sewage to another wasrtwater treatment plant.

Section F. Compliance Schedule and Violations

	Yes	No	N/A	N/E
(a) ANY SIGNIFICANT VIOLATIONS SINCE LAST INSPECTION				X
(b) PERMITTEE IS TAKING ACTION TO RESOLVE VIOLATIONS	*X			
(c) PERMITTEE HAS COMPLIANCE SCHEDULE	X			
(d) COMPLIANCE SCHEDULE CONTAINED :				X
(e) PERMITTEE IS MEETING SCHEDULE OF COMPLIANCE				X

COMMENTS/STATUS:

Actions to resolve the l&l is not known.

Section G. Operation and Maintenance

TREATMENT WORKS:

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

	Yes	No	N/A	N/E
(a) STANDBY POWER AVAILABLE: GENERATOR DUAL FEED	*	X		
(b) ADEQUATE ALARM SYSTEM AVAILABLE FOR POWER OR EQUIPMENT FAILURES	X			
(c) ALL TREATMENT UNITS IN SERVICE OTHER THAN BACKUP UNITS	X			
(d) SUFFICIENT STAFF PROVIDED #SHIFTS DAYS/WK	X			
(e) OPERATOR HOLDS UNEXPIRED LISCENSE OF CLASS I:	X			
(f) ROUTINE AND PREVENTATIVE MAINT.SCHEDULED/PERFORMED ON TIME	X			
(g) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION				X
(h) O&M MANUAL PROVIDED AND MAINTAINED				X
(i) ANY PLANT BYPASSES SINCE LAST INSPECTION		X		
(j) REG. AGENCY NOTIFIED OF BYPASSES--on MORs 1-800 #	X			
(k) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED SINCE LAST INSPEC	X			

COMMENTS/STATUS:

USEPA NPDES No.
Ohio NPDES No.

OH0070980
4PV00008

Section G. Operation & Maintenance (continued)

	Yes	No	N/A	N/E
COLLECTION SYSTEM:				
(a) PERCENT COMBINED SYSTEM: %				
(b) COLLECTION SYSTEM OVERFLOWS SINCE LAST INSPECTION CSO SSO				X
(c) REGULATORY AGENCY NOTIFIED OF OVERFLOWS (SSOs)				X
(d) CSO O&M PLAN PROVIDED AND IMPLEMENTED				X
(e) CSOs MONITORED AND REPORTED IN ACCORDANCE WITH PERMIT				X
(f) PORTABLE PUMPS USED TO RELIEVE SYSTEM				X
(g) LIFT STATION ALARMS PROVIDED AND MAINTAINED	X			
(h) ARE LIFT STATIONS WITH PERMANENT STANDBY POWER OR EQUIV.		X		
(i) ANY INFLOW/INFILTRATION PROBLEM, OR ANY MAJOR REPAIRS TO THE COLLECTION SYSTEM SINCE LAST INSPECTION (SEPARATE SEWER SYSTEM)				X
(j) ANY COMPLAINTS SINCE LAST INSPECTION OF BASEMENT FLOODING			X	
(k) ARE ANY PORTIONS OF THE SEWER SYSTEM AT OR NEAR CAPACITY	X			
COMMENT/STATUS: See cover letter				

Section H. Sludge Management

	Yes	No	N/A	N/E
(a) SLUDGE MANAGEMENT PLAN (SMP)		X		
IF YES, DATE SUBMITTED: APPROVAL #				
(b) SLUDGE MANAGEMENT PLAN CURRENT		X		
(c) SLUDGE ADEQUATELY DISPOSED OF: METHOD-	* X			
(d) IS SLUDGE INCINERATED			X	
IF YES, ASH IS DISPOSED AT:				
(e) IS SLUDGE DISPOSAL CONTRACTED			X	
IF YES, CONTRACTOR NAME:				
(f) HAS AMOUNT OF SLUDGE CHANGED SIGNIFICANTLY SINCE LAST INSPECTION		X		
(g) ADEQUATE SLUDGE STORAGE PROVIDED AT PLANT	*	X		
(h) LAND APPLICATION SITES MONITORED AND INSPECTED PER SMP			X	
(i) RECORDS KEPT IN ACCORDANCE WITH STATE AND FEDERAL LAW				X
(j) ANY COMPLAINTS RECEIVED IN LAST YEAR REGARDING SLUDGE	X			
(k) IS SLUDGE ADEQUATELY PROCESSED (digestion, dewatering, pathogen control)			X	
COMMENTS/STATUS: Due to excessive I&I sludge 3000+ gallons per month of sludge is hauled to Columbus WWTP.				

Section I. Self Monitoring Program

Part 1. Flow Measurement

	Yes	No	N/A	N/E
(a) FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED	* X			
TYPE OF FLOW MEASURING:				
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration):				X
(c) SECONDARY INST. (totalizer, recorder, etc.) PROPERLY OPERATED & MAINT				X
(d) FLOW MEASURING EQUIP. ADEQUATE FOR EXPECTED RANGES OF FLOWS				X
(e) ACTUAL FLOW DISCHARGED IS MEASURED				
(f) FLOW MEASURING EQUIPMENT INSPECTION FREQUENCY:				
DAILY				
MONTHLY				
WEEKLY				
COMMENTS/STATUS: Hour meters on dosing pumps are used to calculate the flow allowed as a temporary measure for flow calculation until this MHP is connected to the Darbydale WWTP collection system.				

Section I. Self Monitoring Program (continued)

Part 2. Sampling

	Yes	No	N/A	N/E
(a) SAMPLING LOCATION(S) ARE AS SPECIFIED IN THE PERMIT	X			
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	X			
(c) PERMITTEE USES REQUIRED SAMPLING METHOD				X
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE				X
(i) SAMPLES REFRIGERATED DURING COMPOSITING				X
(ii) PROPER PRESERVATION TECHNIQUES USED				X
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES CONFORM WITH 40 CFR 136.3				X
(e) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS, INCLUDING ALL ORIGINAL STRIP CHART RECORDS (e.g., continuous monitoring instrumentation, calibration, and maintenance records)				X
(f) ADEQUATE RECORDS MAINTAINED (e.g., sampling date, time, exact location, etc.)				X

Part 3. Laboratory

	Yes	No	N/A	N/E
(a) EPA APP. ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)				X
(b) IF ALTERNATE PROCEDURES ARE USED, PROPER APPROVAL OBTAINED				X
(c) ANALYSIS PERFORMED MORE FREQUENTLY THAN REQUIRED	X			
(d) IF (c) IS YES, ARE RESULTS RECORDED				
(e) COMMERCIAL LABORATORY USED	X			
(1) PARAMETERS ANALYZED BY COMMERCIAL LAB: <u>All parameters</u>				
(2) LAB NAME: <u>TCC</u>				
(f) QUALITY ASSURANCE MANUAL PROVIDED AND MAINTAINED			X	
(g) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	X	X		
(h) ADEQUATE RECORDS MAINTAINED	X			
(i) RESULTS OF LATEST USEPA QUALITY ASSURANCE <u>NA</u>				Satisfactory Marginal Unsatisfactory

COMMENTS/STATUS:



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