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State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

July 8, 2009

Re: Athens County
Happy Valley Estates MHP
Reconnaissance Inspection
Permit OPV00531*BD
Correspondence (PWW)

Mr. Asa Elsea, President
Elsea, Inc.
P.O. Box 580
Circleville, Ohio 43113

Dear Mr. Elsea:

On May 27, 2009, Tim Campbell and I conducted a reconnaissance inspection at the Happy Valley Estates Wastewater Treatment Plant (WWTP). Steve Walraven, the mobile home park maintenance person, represented Elsea, Inc. during the inspection. The purpose of the inspection was to determine compliance with terms and conditions set forth in the National Pollutant Discharge Elimination System (NPDES) Permit. Wastewater samples were not taken. A copy of the inspection report form is attached.

Based on the inspection and file review, the facility was found to be in **non-compliance** with the permit on the day of the inspection.

As a result of the inspection and file review, I have the following comments:

1. At the time of the inspection, the existing "old" wastewater treatment system was still in use, but aeration had been shut off because of the high flows due to the rain in an attempt to minimize washout of solids. However, solids were washing out at the time of the inspection (see attached photographs). This is a violation of Part III of the NPDES permit, which requires the discharge to be free of substances that will form sludge deposits and that alter the natural color of the stream.

Part I, C, d, of the permit required Elsea, Inc. to "attain operational level of the treatment works", where "treatment works" referred to the "new" wastewater treatment system, by September 1, 2007. The failure of Elsea, Inc. to comply with this requirement is a violation of your NPDES Permit.

During the last inspection on October 21, 2008, Tom Bouts (operator) and Mary Harrison-Reed (VP of Communities) who represented Elsea, Inc. agreed that the "new" wastewater treatment system would be fully operational by December 1, 2008. The new plant has been constructed, and according to the maintenance person is waiting for electric hookup. Please notify this office, in writing, when in the next two weeks the "new" wastewater treatment system will attain full operation.

2. A review of the Discharge Monitoring Reports for the months of January through March 2009 indicates violations of the conditions of your NPDES permit at outfall 001. The specific instances of noncompliance and/or deficiencies are as follows:

Month	Parameter	Type	Units	Limit	Reported	Date
Jan. 2009	Nitrogen, Ammonia	30D Conc	mg/L	3	11	1/1/2009
Jan. 2009	Nitrogen, Ammonia	30D Qty	Kg/day	0.159	0.375	1/1/2009
Jan. 2009	CBOD 5 day	30D Conc	mg/L	10	15.5	1/1/2009
Jan. 2009	CBOD 5 day	1D Conc	mg/L	15	28	1/4/2009
Jan. 2009	CBOD 5 day	1D Qty	Kg/day	0.795	0.954	1/4/2009
Jan. 2009	Nitrogen, Ammonia	1D Conc	mg/L	4.5	19.5	1/25/2009
Jan. 2009	Nitrogen, Ammonia	1D Qty	Kg/day	0.239	0.664	1/25/2009
Jan. 2009	CBOD 5 day	1D Conc	mg/L	15	23	1/25/2009
Feb. 2009	Total Suspended Solids	30D Conc	mg/L	12	13	2/1/2009
Feb. 2009	Nitrogen, Ammonia	30D Conc	mg/L	3.0	4.15	2/1/2009
Feb. 2009	CBOD 5 day	30D Conc	mg/L	10	10.25	2/1/2009
March 2009	Nitrogen, Ammonia	30D Conc	mg/L	3.0	3.7	3/1/2009
March 2009	CBOD 5 day	30D Conc	mg/L	10	10.75	3/1/2009

3. There are obvious problems in the collection system with inflow and infiltration. According to the previous inspection report, Ms. Harrison-Reed and Mr. Bouts agreed to submit a plan, subject to Ohio EPA approval, to investigate and repair sources of I/I in the collection system by January 1, 2009. To date, I have not received this plan. Submit the plan within two weeks of receipt of this notice.

The condition of the plant was deplorable. Due to the severity of the problems, we are requesting your presence at an enforcement meeting that we have scheduled for July 28, 2009 at 10:30 a.m. in the Southeast District Office in Logan. If for any reason you are unable to attend the meeting, contact me as soon as possible to reschedule.

Please respond, in writing, to comments 1 through 3 within fourteen (14) days of the date of this letter. Should you have any questions or concerns, feel free to contact me at (740) 380-5284.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

- c: Tom Bouts, Operator
- c: Mary Harrison-Reed, Elsea, Inc.

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OPV00531*BD	OH0127973	May 27, 2009	R	S	1

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Happy Valley Estate MHP 6800 Baker Road Athens, Ohio 45701	2:00 p.m.	September 1, 2007
	Exit Time	Permit Expiration Date
	2:30 p.m.	August 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
MHP Maintenance Person	(614) 866-0898 (740) 474-5710
Name, Address and Title of Responsible Official	Phone Number
Asa Elsea, President Elsea, Inc. P.O. Box 580 Circleville, Ohio 43113	(740) 474-5710

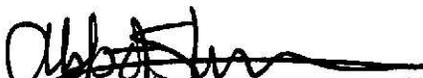
C. AREAS EVALUATED DURING INSPECTION

<u> </u> S Permit	<u> </u> N Flow Measurement	<u> </u> N/A Pretreatment
<u> </u> N Records/Reports	<u> </u> N Laboratory	<u> </u> U Compliance Schedules
<u> </u> U Operations & Maintenance	<u> </u> U Effluent/Receiving Waters	<u> </u> U Self-Monitoring Program
<u> </u> S Facility Site Review	<u> </u> S Sludge Storage/Disposal	<u> </u> Other
<u> </u> U Collection System		

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

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

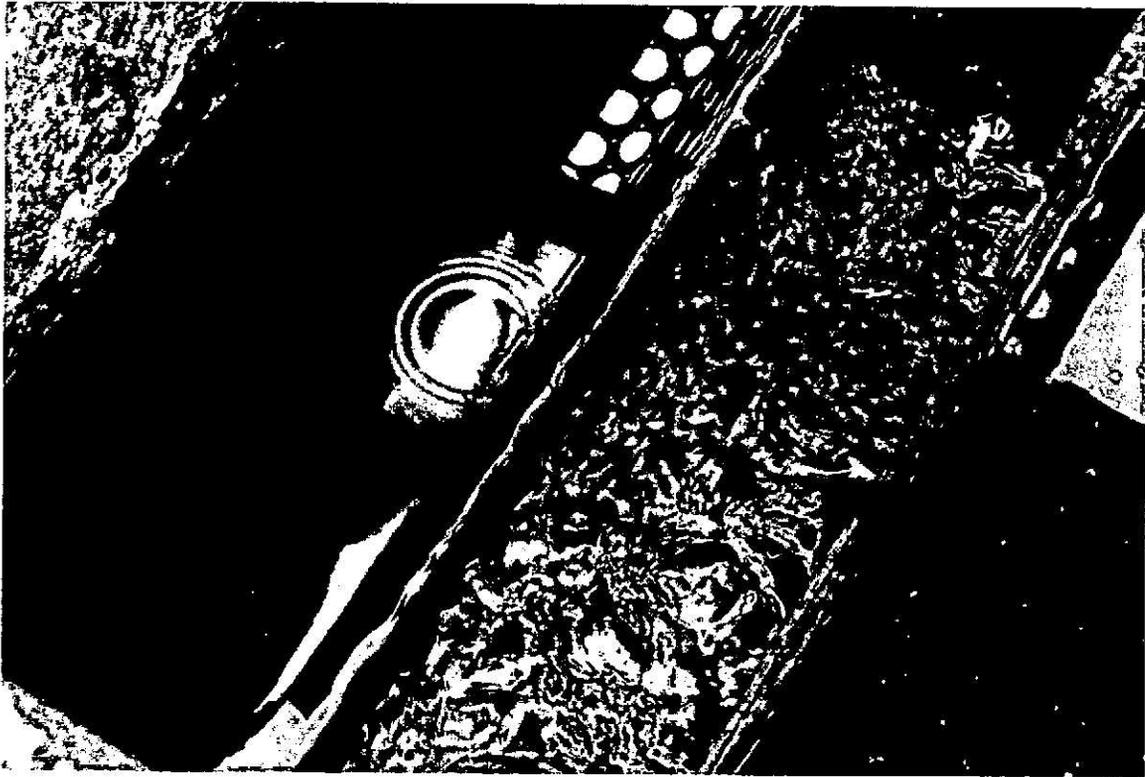
See attached inspection letter.


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

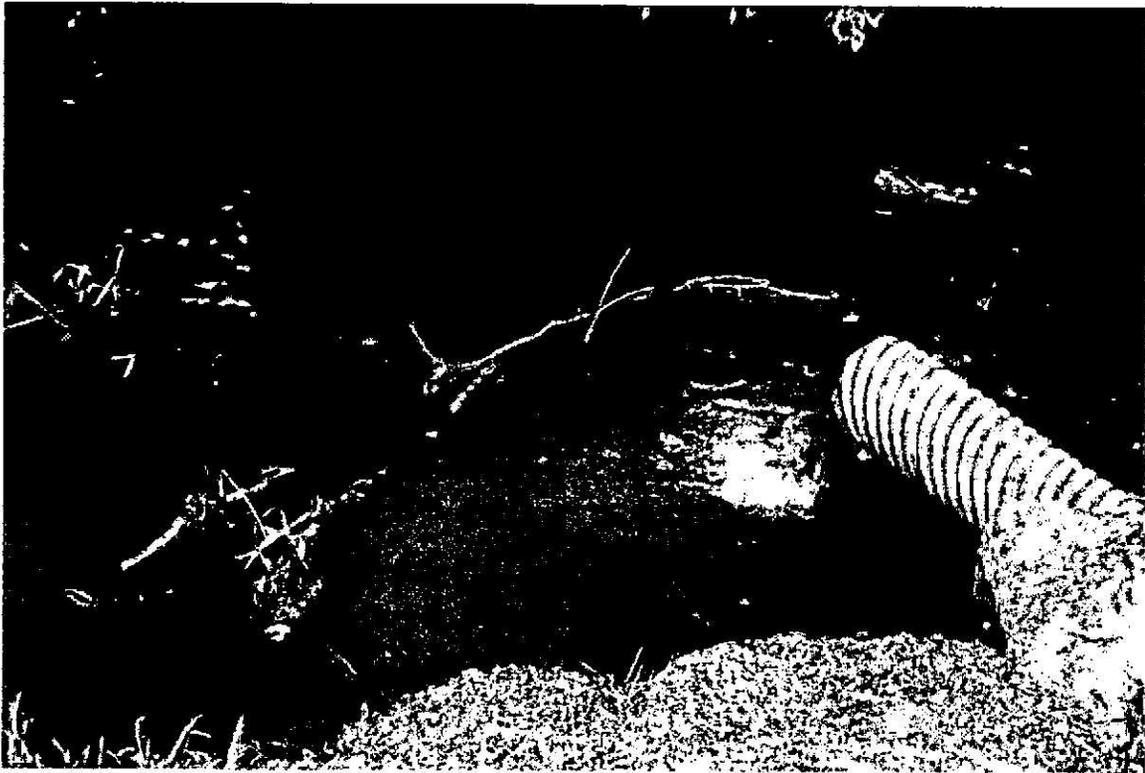
Date 7/8/09


Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

Date 7/8/09



HAPPY VALLEY MHP STP FINAL CLARIFIER DISCHARGE



HAPPY VALLEY MHP DISCHARGE 5/27/09