



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

June 15, 2010

**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 February 23, 2010, Tim Campbell and I conducted a reconnaissance inspection at the Happy Valley Estates Wastewater Treatment Plant (WWTP). I conducted follow-up inspections on April 23 and May 7, 2010. Tom Bouts, the operator of record, was present during the April inspection. The purpose of the inspections 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 inspections and file review, I have the following comments:

1. During the February inspection we found a portable pump had been set up to bypass the sand filters because they were plugged and not operating. See attached photos. This is an unauthorized bypass and a violation of the NPDES permit Part III Item 11. In addition, no report regarding the bypass was received by Ohio EPA as required by Part III Item 12 of the NPDES permit. There was also evidence that the influent pump station had overflowed because there were rags and plastics deposited on the ground next to it. See attached photograph.

When I arrived for the April inspection Tom Bouts was working on the plant to get the sand filters operational, two months later. He said her could have the filters back in operation in a week or 2. On April 28, 2010, he notified me that one filter was back in operation, and that the other would be in service within a week.

When I inspected the plant on May 7th only one of the sand filters was clean and working properly. The influent pump station water level was very high and there was evidence it had overflowed in the recent past. The alarm was not operating. There was no flow exiting the discharge pipe to the creek. I called Tom and asked him to check on the pump station right away. Tom repaired the pump station that day after I notified him that it was not operating properly. On May 12, he reported problems again with the pump station which he repaired and placed back into operation. On May 17th the Ohio EPA received a report from Tom that the WWTP was flooded and bypassing due to a severe storm in the area.

There is a serious lack of proper operation and maintenance at this plant. Failure to properly operate and maintain the wastewater facility is a violation of Part III Item 3 of the NPDES permit.

In your response, propose actions to assure Ohio EPA that these types of problems will not occur in the future.

2. On July 28, 2009, Tim and I met with you and Tom to discuss the problems at the plant. At that time, you were already in non-compliance with the compliance schedule contained in the NPDES permit for failure to perform sewer system improvements as required by Part I Item C of the permit. At that time you agreed to the following:
  - a. By October 1, 2009, you would: install manholes on the main line into the plant and at the 3 intersections on the old side of the park; and televise all the sewer lines.
  - b. By April 1, 2010, you would submit a report on your investigation of the inflow and infiltration (I/I) of your sewers including a list of repairs to be made, and indicating that each mobile home connection to the sewers had been checked for proper connections by April 1, 2010. Tom showed me that one manhole has been installed on the main line into the plant. What else has been accomplished on this commitment list?
  - c. Tom agreed to provide monthly reports on the I/I study. I have not received any reports.

You have not complied with any of these deadlines. You are required to complete the work identified in item 2,a, b, and c above as required by Part I, C of the permit by August 1, 2010.

If the operation of this wastewater treatment system does not show significant improvement we will have no alternative than to pursue escalated enforcement action.

Please respond, in writing, to comments 1 and 2 within fourteen (14) days of the date of this letter. If you have any questions, please contact me at (740)380-5284 at your convenience.

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
0PV00531*BD	OH0127973	2/23/10, 4/23/10, 5/7/10	R	S	1

## B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Happy Valley Estates MHP 6800 Baker Road Athens, Ohio 45701	Various	September 1, 2007
	Exit Time	Permit Expiration Date
	Various	August 31, 2012

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
None on 2/23/10 and 5/7/10 Tom Bouts, Operator of Record, on 4/23/10	(740) 983-4087 (614) 419-3623
Name, Address, & Title of Responsible Official	Phone Number
Asa Elsea, President Elsea, Inc. P.O. Box 580 Circleville, Ohio 43113	(740) 474-5710

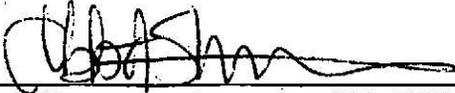
## C. AREAS EVALUATED DURING INSPECTION

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

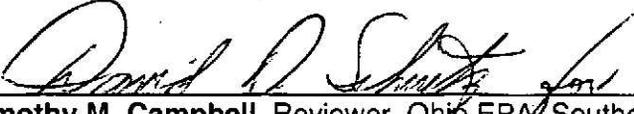
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

See attached inspection letter.

  
Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

6/14/10  
Date

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

6/14/10  
Date