



**Environmental  
Protection Agency**

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

February 27, 2012

Daniel Inks, President  
I & R Properties  
9 Corporation Center  
Broadview Heights, OH 44147

**Re: Hickory Grove MHP  
NPDES Permit 4PY00005/ OH0121347  
Reconnaissance Inspection  
Morrow County  
Notice of Violation**

Dear Mr. Inks:

On February 7, 2012, a Reconnaissance Inspection was conducted at the Hickory Grove Mobile Home Park in Morrow County, Ohio. Present for the inspection were Bob Davis and Rick West representing I & R Properties and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate the status of efforts to resolve effluent violations for suspended solids and CBOD<sub>5</sub>. This facility is currently categorized as being in Significant Non-Compliance (SNC) due to the frequency and magnitude of suspended solids and CBOD<sub>5</sub> violations. (Note: This facility was on the SNC list in 2009-2010 for fecal coliform and chlorine violations). The operator has increased the cleaning frequency of the fixed media clarifiers and is now operating the aeration blowers continuously to address these violations. No effluent violations have been reported since October 2011.

The Hickory Grove Mobile Home Park has been in SNC since 2009 and has been prioritized for enforcement action as a consequence of the chronic non-compliance with NPDES permit limits. In order to be removed from the SNC list, you must comply with NPDES permit limits for suspended solids and CBOD<sub>5</sub> for two successive quarters. Failure to resolve these violations shall result in the initiation of formal enforcement action with financial penalty.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3848 or e-mail at [mike.sapp@epa.ohio.gov](mailto:mike.sapp@epa.ohio.gov).

Sincerely,

Michael Sapp  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

ec: Mike Sapp

MS/nsm Hickory grove MHP 12

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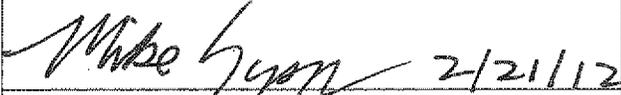
NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PY00005	OH0121347	RI	S	Semi-Public
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
2/7/2011	10:00 AM	10:35 AM	No	Yes

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Hickory Grove MHP 7117 County Road 59 Johnsville, Ohio 44904	7/1/2007
	Permit Expiration Date
	6/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Bob Davis, Operator of Record Rick West	(440) 336-1867
Name and Title of Responsible Official	Phone Number
Daniel Inks, President	(440) 838-4868

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
U	NPDES Compliance	Non-compliance with effluent limits.
S	Operations & Maintenance	
S	Facility Site Review	
M	Collection System	Excessive inflow and infiltration
S	Flow Measurement	
U	Receiving Waters	SNC for suspended solids and CBOD <sub>5</sub>
S	Laboratory	

Comments:

Signatures	
 2/21/12	 2/22/12
Mike Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

## SUMMARY OF FINDINGS AND COMMENTS

### Hickory Grove Mobile Home Park 4PY00005 - OH0121347

The wastewater treatment plant serving the Hickory Grove Mobile Home Park is located at 7117 County Road 59 near Johnsville, Ohio and has a design treatment capacity of 20,000 gpd. Effluent from this plant is discharged to an unnamed tributary of Cedar Fork Creek. The treatment facility consists of a 3000 gallon trash trap, a flow equalization basin (8800 gallons), and aeration system (4-5090 gallon tanks), two conventional clarifiers, two fixed media clarifiers, two rapid sand filters, followed by chlorination and dechlorination units. A sludge holding tank provides storage and decant capabilities for solids. At present, only 40% of the 100 pads in the park are occupied.

At the time of the inspection, the following general observations were made with operational practices at the facility:

1. The trash trap is pumped-out every 4-6 months.
2. Clarifier walls are scraped once every two weeks.
3. The aeration blowers are now operated continuously to address recent CBOD<sub>5</sub> violations.
4. Thirty minute settleability tests are performed weekly to assess solids inventories. The operator targets settleabilities at 50-55% for optimal treatment.
5. The fixed media clarifiers are generally cleaned on an as needed basis.
6. A high level gravity overflow line exists from the flow equalization tank to the aeration tank.
7. During high flow/wet weather events a float control in the aeration tank will shut-off the aeration blowers.
8. Bob Davis is the operator of record and generally visits the plant 3 times/week. Rick West records readings from the hour meters on the dosing pumps and takes daily measurements when the operator of record is not present.
9. Fecal coliform violations, experienced in 2010 and 2011 were addressed by adding chlorine in the weirs of the fixed media filters.
10. The attached table contains a list of NPDES permit violations for the time period between March - December 2011. The CBOD<sub>5</sub> and suspended solids violations were of sufficient magnitude as to result in the placement of this facility on the Significant Non-Compliance List. The operator has increased the cleaning

frequency of the fixed media clarifiers and is now operating the aeration blowers continuously to address these violations. In order to be removed from the SNC list, the plant must be in compliance with CBOD<sub>5</sub> and suspended solids limits for two successive quarters.

11. The average daily flow at outfall 001, for the time period between March – December 2011 was 15,000 gpd. The plant experienced a peak daily flow during this time period of 69,000 gpd on March 9, 2011. The park manager indicated that they recently capped several open taps on vacant lots to reduce inflow.

NPDES Compliance Inspection Report

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Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	<i>If current permit compliance is maintained</i>
S	Operations & Maintenance	<i>or recent NPDES compliance</i>
S	Facility Site Review	
M	Collection System	Excessive inflow and infiltration
S	Flow Measurement	
U	Receiving Waters	SNC for suspended solids and CBOD <sub>5</sub>
S	Laboratory	

Comments:

Signatures	
 Mike Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office
Date 2/14/11	Date

## Compliance Data for Hickory Grove MHP between 3/1/2011 to 12/31/2011

### Summary

Permit Effluent Limit Violations: 16

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	001	CBOD 5 day	30D Conc	10	25.	5/1/2011
May 2011	001	CBOD 5 day	30D Qty	0.76	2.17638	5/1/2011
May 2011	001	CBOD 5 day	1D Conc	15	25.	5/11/2011
May 2011	001	CBOD 5 day	1D Qty	1.14	2.17638	5/11/2011
June 2011	001	Fecal Coliform	30D Conc	1000	3100.	6/1/2011
June 2011	001	Fecal Coliform	1D Conc	2000	3100.	6/22/2011
September 2011	001	Total Suspended Solids	30D Qty	0.91	1.49886	9/1/2011
September 2011	001	CBOD 5 day	30D Conc	10	14.	9/1/2011
September 2011	001	CBOD 5 day	30D Qty	0.76	2.33156	9/1/2011
September 2011	001	Total Suspended Solids	1D Qty	1.36	1.49886	9/22/2011
September 2011	001	CBOD 5 day	1D Qty	1.14	2.33156	9/22/2011
October 2011	001	Total Suspended Solids	30D Conc	12	17.	10/1/2011
October 2011	001	CBOD 5 day	30D Conc	10	57.	10/1/2011
October 2011	001	CBOD 5 day	30D Qty	0.76	1.51022	10/1/2011
October 2011	001	CBOD 5 day	1D Conc	15	57.	10/5/2011
October 2011	001	CBOD 5 day	1D Qty	1.14	1.51022	10/5/2011

Flow Data for Hickory Grove MHP between 3/1/2011 and 12/31/2011

	Date	Flows (MGD)
Ten Highest Flows	3/9/2011	0.009
	3/11/2011	0.057
	3/10/2011	0.050
	3/4/2011	0.048
	10/20/2011	0.046
	3/2/2011	0.045
	3/7/2011	0.044
	5/27/2011	0.044
	9/22/2011	0.044
	3/18/2011	0.043
<b>Average Flow Rate</b>		0.015