



Environmental
Protection Agency

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

Certified Mail #91 7108 2133 3932 1838 6183

May 16, 2012

Robert Teare, Regional Property Manager
Moore Enterprises
1902 S. Main Street
Bloomington, IL 61704

**Re: Westerville Estates MHP
NPDES Permit 4PV00002/ OH0055239
Reconnaissance Inspection
Delaware County**

Dear Mr. Teare:

On May 2, 2012, a Reconnaissance Inspection was conducted at the Westerville Estates MHP in Delaware County, Ohio. Present for the inspection were Bob Armstrong from Winelco, Inc. representing Westerville Estates MHP and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant.

The Reconnaissance Inspection raised several concerns which must be addressed in the following areas:

Plant Flows – The average daily flow at outfall 001 (73,000 gpd), exceeds the design average flow rate for the treatment plant (70,000 gpd). Peak flows during rain events range from 240,000- 466,000 gpd. It is my concern that the frequency and magnitude of loading violations will increase until measures are undertaken to remove inflow and infiltration from the collection system.

Inflow and Infiltration – Please submit a plan to evaluate and remove inflow and infiltration from the collection system within 60 days of the receipt of this report.

Robert Teare, Regional Property Manager
Moore Enterprises
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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.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Sapp". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Sapp".

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

Enclosures

c: Bob Armstrong, Winelco w/enclosures

ec: Michael Sapp

MS/nsm Westerville Estates MHP 12

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PV00002	OH0055239	RI	S	Semi-Public
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/2/2012	1:00 PM	1:45 PM	No	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Westerville Estates MHP 11050 Fancher Road Westerville, Ohio 43081	1/1/2011
	Permit Expiration Date
	12/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Bob Armstrong – Contract Operator Winelco Inc.	(513) 317-8672
Name and Title of Responsible Official	Phone Number
Robert Teare, Regional Property Manager - Moore Enterprises	(309) 828-1131

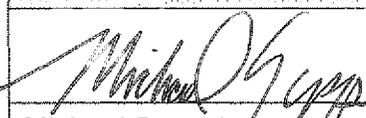
SECTION C: AREAS EVALUATED DURING INSPECTION

Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	NPDES Compliance	
S	Operations & Maintenance	
S	Facility Site Review	
U	Collection System	Excessive inflow and infiltration
S	Flow Measurement	
S	Receiving Waters	
N	Laboratory	

Comments:

Signatures

 5/13/12	 5/15/12
Michael Sapp, Inspector Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Westerville Estates MHP between 4/1/2011 to 4/1/2012

Summary

Permit Effluent Limit Violations: 1
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 4
 Compliance Schedule Violations: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2011	001	CBOD 5 day	7D Qty	4.0	5.92731	12/1/2011

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
March 2012	001	Odor, Severity	1/Day	1	0	03/30/2012
March 2012	001	Water Temperature	1/Day	1	0	03/30/2012
March 2012	001	Color, Severity	1/Day	1	0	03/30/2012
March 2012	001	Turbidity, Severity	1/Day	1	0	03/30/2012

Flow Data for Westerville Estates MHP between 4/1/2011 and 4/1/2012

	Date	Flows (MGD)
Ten Highest Flows	2/16/2012	0.466
	7/23/2011	0.288
	7/24/2011	0.288
	7/25/2011	0.288
	5/4/2011	0.281
	11/30/2011	0.274
	12/7/2011	0.261
	4/6/2011	0.257
	4/20/2011	0.243
	1/27/2012	0.242
Average Flow Rate		0.073

SUMMARY OF FINDINGS AND COMMENTS
Westerville Estates Mobile Home Park
4PV00002 - OH0055239

The wastewater treatment plant serving Westerville Estates Mobile Home Park is located at 11050 Fancher Road in Delaware, Ohio and has a design treatment capacity of 70,000 gpd. Effluent from this plant is discharged to an unnamed tributary to Rocky Fork Creek. The treatment facility consists of a 150,000 gallon flow equalization basin, and extended aeration system, four final clarifiers, four tertiary sand filters and ultraviolet disinfection. A 10,000 gallon tank with decant capability is provided for sludge storage. The park is comprised of 297 lots or pads.

1. At the time of the inspection, the following general observations were made regarding the operation and maintenance of the plant:
 - The aeration and flow equalization blowers are operated continuously except during high flow events.
 - If a high flow condition occurs the operator first checks the high level pump in the flow equalization basin. If that pump is on, he'll place additional sand filters into service then shut-off the aeration blowers if necessary.
 - This facility is not equipped with a trash trap or fixed media clarification.
 - Winelco performs all the lab tests including fecal coliform.
 - Judge's Sanitation hauls liquid sludge from the plant.
 - The plant is not equipped with the capability to bypass the tertiary filters.
 - Flow is metered at three locations; time elapsed meters on the influent pumps, flow equalization pumps and tertiary dosing pumps. Readings from the tertiary dosing pumps are reported as the final effluent flow.
 - One influent pump was out of service at the time of the inspection and it was expected to be repaired by the end of the week.
2. The average daily flow at outfall 001, for the time period from April 2011 – March 2012 was 73,000 gpd. Please note that the average daily flow at this facility exceeds the design average flow rate. The maximum daily flow experienced during this time period was 466,000 on February 16, 2012. Daily maximum flows have exceeded 240,000 gpd on at least nine other occasions during this time period.
3. The plant experienced one permit violation since the previous inspection in April 2011 (see attached table). It is my concern that the frequency and magnitude of loading violations will increase until measures are undertaken to remove inflow and

infiltration from the collection system. Please submit a plan to evaluate and remove inflow and infiltration from the collection system within 60 days of the receipt of this report. At a minimum, the plan should include the following items:

- An inflow and infiltration analysis (smoke testing, flow analysis, televising, grouting, replacement, manhole repair, etc...).
- A description of the work that has been completed to date and the date on which the work was performed.
- An identification of repairs that will be performed in order to reduce the volume of inflow and infiltration in the sanitary sewer system. A schedule should also be provided for the completion of the necessary repairs.

Failure to undertake a systematic program to evaluate and eliminate inflow and infiltration from the collection may result in a Schedule of Compliance for the improvements in your next permit, or alternatively, the issuance of Directors Final Findings and Orders.

4. Park personnel believe that the storm water pond is a significant source of infiltration and may be connected to the sanitary sewer system through an abandoned storm water pump station. I would recommend that park personnel investigate this through televising or dye testing once the water level in the pond drops.