



Environmental  
Protection Agency

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

March 23, 2012

Joe Phelan, Owner  
Villa Vista MHP  
7706 Heatherwood Lane  
Dublin, OH 43017

Re: **Villa Vista MHP**  
**NPDES Permit: 4FV00113/ OH0124362**  
**Compliance Evaluation Inspection**  
**Licking County**

Dear Mr. Phelan:

On March 21, 2012, a Compliance Evaluation Inspection was conducted at the Villa Vista MHP. Present for the inspection was Mr. Dave Kuehner of Villa Vista MHP and Suzanne Matz 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 following findings were made during the inspection:

- The operator logbook was not available for viewing at the WWTP as required in the NPDES permit. In the future, the logbook must be kept at the plant in a secure location, protected from the weather. The WWTP operator will provide scanned copies of the last 2 months of logbook entries to Paul Vandermeer via e-mail by April 20, 2012 (see Attachment for response).
- Operations and maintenance at the plant are well managed. Blowers, clarifiers, and pumps are regularly maintained and checked. Sand filter beds are alternated 2 on and 2 off for maintenance. The owner is planning to refurbish both beds with new sand in the coming weeks.

If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at [paul.vandermeer@epa.ohio.gov](mailto:paul.vandermeer@epa.ohio.gov).

Sincerely,

Paul L. Vandermeer  
Environmental Specialist  
Compliance and Enforcement Unit  
Division of Surface Water  
Central District Office

ec: Paul Vandermeer

PV/nsm Villa Vista MHP

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NPDES Compliance Inspection Report

| SECTION A: NATIONAL DATA SYSTEM CODING |            |                 |                     |                            |
|--|------------|-----------------|---------------------|----------------------------|
| Permit #                               | NPDES #    | Inspection Type | Inspector           | Facility Type              |
| 4PV00113                               | OH0124362  | CEI             | S                   | 1                          |
| Inspection Date                        | Entry Time | Exit Time       | Notice of Violation | Significant Non-Compliance |
| 3/21/2012                              | 10:00 AM   | 10:45 AM        | No                  | No                         |

| SECTION B: FACILITY DATA                                  |                        |
|---|------------------------|
| Name and Location of Facility Inspected                   | Permit Effective Date  |
| Villa Vista MHP<br>1308 Blocker Drive<br>Newark, OH 43056 | 6/1/2007               |
|   | Permit Expiration Date |
|   | 5/31/2012              |
| Name(s) and Title(s) of On-Site Representatives           | Phone Numbers          |
| Dave Kuehner, Operator                                    | (740) 919-9040         |
| Name and Title of Responsible Official                    | Phone Number           |
| Joe Phelan, Owner   | (614) 582-7393         |

| SECTION C: AREAS EVALUATED DURING INSPECTION                               |                          |   |
|--|--------------------------|---|
| Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated |                          |   |
| M  | NPDES Compliance         | Operator log book not available at WWTP as required |
| S  | Operations & Maintenance |   |
| S  | Facility Site Review     |   |
| S  | Collection System        |   |
| S  | Flow Measurement         |   |
| S  | Receiving Waters         |   |
| N  | Laboratory               | MASI Laboratory provides all sample analysis        |

Comments:

| Signatures  |         |  |         |
|---|---------|--|---------|
|                                | 3/23/12 |                | 3/23/12 |
| Paul L. Vandermeer, Inspector<br>Compliance & Enforcement<br>Division of Surface Water<br>Central District Office | Date    | Mike Gallaway, Reviewer<br>Section Manager<br>Division of Surface Water<br>Central District Office | Date    |

## Compliance Data for Villa Vista MHP between 2/1/2011 to 3/1/2012

**Summary**

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

| Limit Violations |         |                  |            |       |          |                |
|------------------|---------|------------------|------------|-------|----------|----------------|
| Reporting Period | Station | Parameter        | Limit Type | Limit | Reported | Violation Date |
| June 2011        | 001     | CBOD 5 day       | 1D Conc    | 15    | 22.      | 6/3/2011       |
| June 2011        | 001     | Dissolved Oxygen | 1D Conc    | 6.0   | 5.3      | 6/3/2011       |
| August 2011      | 001     | Dissolved Oxygen | 1D Conc    | 6.0   | 5.5      | 8/5/2011       |
| August 2011      | 001     | CBOD 5 day       | 1D Conc    | 15    | 19.      | 8/5/2011       |

**SECTION D: PERMIT VERIFICATION**

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Products and production rates conform with permit application ..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application ..... Y
- (f) New treatment process added since last inspection ..... N
- (g) Notification given to State of new, different or increased discharges ..... NA
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments:

**SECTION E: COMPLIANCE**

- (a) Any significant violations since the last inspection ..... N
- (b) Permittee is taking actions to resolve violations ..... NA
- (c) Permittee has a compliance schedule ..... NA
- (d) Permittee is meeting compliance schedule ..... NA

Comments:

**SECTION F: OPERATION AND MAINTENANCE**

- (a) Standby power available ..... N  
If yes, what type?
- (b) Adequate alarm system available for power or equipment failures ..... Y
- (c) All treatment units in service other than backup units ..... Y
- (d) Wastewater Treatment Works classification ..... I
- (e) Operator of Record holds unexpired license of class required by Permit ..... Y  
Class held: I
- (f) Copy of certificate of Operator of Record displayed on-site ..... N\*
- (g) Minimum operator staffing requirements fulfilled ..... Y
- (h) Routine and preventative maintenance scheduled and performed ..... Y
- (i) Any major equipment breakdown since last inspection ..... N
- (j) Operation and maintenance manual provided and maintained ..... NE
- (k) Any plant bypasses since last inspection ..... N\*\*
- (l) Regulatory agency notified of bypasses ..... NA  
By MOR  and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection ..... N

Comments: \*Plant has no structure to house certificate. \*\*Part of plant was inundated by floodwaters due to heavy rain (>5") event. As soon as floodwaters diminished, the plant was brought back online very quickly and reseeded with sludge

from the sludge storage tank. The plant was operational during the inspection and appeared to be functioning properly.

**SECTION G: RECORD KEEPING**

- a) Log book provided ..... N\*
- b) Format of log book **hard bound book**
- c) Log book(s) kept onsite in an area protected from weather ..... N
- d) Log book contains the following:
  - i) Identification of treatment works ..... NE
  - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 ..... NE
  - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) ..... NE
  - iv) Laboratory results (unless documented on bench sheets) ..... NE
  - v) Identification of person making log entries ..... NE
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments: \*Operator will provide scanned copies of the last 2 months of logbook entries (faxed copy provided to Paul Vandermeer on 3/22/12). Operator will begin using logbook and keep on site according to faxed letter (Attached).

**SECTION H: COLLECTION SYSTEM**

- a) Percent combined system: ..... 0%
- b) Any collection system overflows since last inspection ..... N  
     CSO       SSO
- c) Regulatory agency notified of overflows ..... NA
- d) CSO O&M plan provided and implemented. .... NA
- e) CSOs monitored and reported in accordance with permit ..... NA
- f) Portable pumps are used to relieve system ..... NA
- g) Lift station alarms provided and maintained ..... Y
- h) Lift stations equipped with permanent standby power or equivalent ..... N\*
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection. .... N
- j) Any complaints received since last inspection of basement flooding ..... N
- k) Are any portions of the sewer system at or near capacity ..... N
- l) Are operations changed during high-flow events? ..... N

Comments: \*Plant and lift station on double loop electrical grid, so power rarely goes out.

**SECTION I: SLUDGE MANAGEMENT**

- a) Sludge adequately disposed ..... Y\*  
     Method: *Hauled to Newark WWTP for disposal*
- b) If sludge is incinerated, where is ash disposed of ..... NA
- c) Is sludge disposal contracted ..... Y  
     Name: *Banks Septic*
- d) Has amount of sludge generated changed significantly ..... N
- e) Adequate sludge storage provided at plant ..... Y
- f) Records kept in accordance with State and Federal law ..... NE
- g) Any complaints received last year regarding sludge ..... N
- h) Is sludge adequately processed (digestion, pathogen control) ..... NA\*

Comments: \*Sludge storage tank available on-site. Sludge hauling performed very infrequently.

**SECTION J: SELF-MONITORING PROGRAM**

- a) Primary flow measuring device operated and maintained ..... Y  
     Type of device: *Dosing pump timer* Device location: *Dosing pump*
- b) Calibration frequency adequate ..... NA  
     Date of last calibration: *Uses pump specifications*
- c) Secondary instruments operated and maintained ..... NA
- d) Flow measurement equipment adequate to handle full range of flows ..... Y
- e) Actual flow discharged is measured ..... Y
- f) Flow measuring equipment inspection frequency Daily
- g) Sampling location(s) are as specified by permit ..... Y
- h) Parameters and sampling frequency agree with permit ..... Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) ..... NE

Comments:

**SECTION K: Laboratory**

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) ..... Y
- b) If alternate procedures are used, are they properly approved? ..... NA
- c) Analysis performed more frequency ..... NA  
     If yes, are results recorded in permittee's report? ..... NA
- d) Commercial laboratory used:  
     Name: *MASI*  
     Parameters analyzed: *All*
- e) Quality assurance manual provided and maintained ..... NA
- f) Calibration and maintenance of instruments is satisfactory? ..... NA

g) Results of last U.S. EPA quality assurance ..... NA  
 Date:

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATION

| Outfall Number | Outfall sign in place | Oil Sheen | Grease | Turbidity | Foam | Solids | Color | Other |
|----------------|-----------------------|-----------|--------|-----------|------|--------|-------|-------|
| 001            | No*                   | No        | No     | No        | No   | No     | Clear |       |
|                |                       |           |        |           |      |        |       |       |
|                |                       |           |        |           |      |        |       |       |
|                |                       |           |        |           |      |        |       |       |

Comments: \*Facility must install signage. It will be placed on the inside of fence to inhibit theft. Sign is approximately 20 feet from the actual outfall on the stream and will be visible from the stream.

**SECTION M: MULTIMEDIA OBSERVATIONS**

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories ..... N
- b) Do you notice staining or discoloration of soils, pavement or floors ..... N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
- e) Do you notice any unusual odors or strong chemical smells ..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

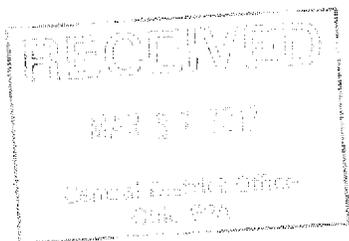
- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments:



3/22/2012

DEAR; PAUL VANDERMEER, pleasure meeting with you folks yesterday. Here are copies of my daily Logs or MOR'S for JAN & Feb. 2012 I will obtain a regular Log book & keep at Plant.



Thanks

David L. ...







Month February 2012

VILLA VISTA EFFLUENT Daily Records

Final Effluent

| Date  | Chlorine | Temp.   | Flow    | Color    | Odor     | Turbidity | Operator | Comments                          |
|-------|----------|---------|---------|----------|----------|-----------|----------|-----------------------------------|
|       | mg/l     | C       | MGD     | Estimate | Estimate | Estimate  | Initials |                                   |
| 1     | NA       | 8°      | 16,500  | 0        | 0        | 0         | D.K.     |                                   |
| 2     | NA       | 8°      | 14,400  | 0        | 0        | 0         | D.K.     |                                   |
| 3     | NA       | 7°      | 15,200  | 0        | 0        | 0         | D.K.     | Took Grab/Comp. Samples           |
| 4     | NA       | AN      | 15,300  | AN       | AN       | AN        | D.K.     |                                   |
| 6     | NA       | AN      | 17,600  | AN       | AN       | AN        | D.K.     |                                   |
| 6     | NA       | 5°      | 16,600  | 0        | 0        | 0         | D.K.     | ck oil, belts & grease p.m. plant |
| 7     | NA       | 2°      | 14,300  | 0        | 0        | 0         | D.K.     |                                   |
| 8     | NA       | 2°      | 15,700  | 0        | 0        | 0         | D.K.     |                                   |
| 9     | NA       | 15°     | 15,400  | 0        | 0        | 0         | D.K.     |                                   |
| 10    | NA       | 5°      | 17,000  | 0        | 0        | 0         | D.K.     | Took Comp./Grab Samples           |
| 11    | NA       | AN      | 15,700  | AN       | AN       | AN        | D.K.     |                                   |
| 12    | NA       | AN      | 17,400  | AN       | AN       | AN        | D.K.     |                                   |
| 13    | NA       | 4.5°    | 19,900  | 0        | 0        | 0         | D.K.     |                                   |
| 14    | NA       | 5°      | 14,800  | 0        | 0        | 0         | D.K.     |                                   |
| 15    | NA       | 5°      | 16,800  | 0        | 0        | 0         | D.K.     |                                   |
| 16    | NA       | 6°      | 17,200  | 0        | 0        | 0         | D.K.     |                                   |
| 17    | NA       | 7°      | 17,800  | 0        | 0        | 0         | D.K.     | Took Grab/Comp. samples.          |
| 18    | NA       | AN      | 14,300  | AN       | AN       | AN        | D.K.     |                                   |
| 19    | NA       | AN      | 13,000  | AN       | AN       | AN        | D.K.     |                                   |
| 20    | NA       | 7°      | 15,900  | 0        | 0        | 0         | D.K.     |                                   |
| 21    | NA       | 7°      | 17,900  | 0        | 0        | 0         | D.K.     |                                   |
| 22    | NA       | 8°      | 19,100  | 0        | 0        | 0         | D.K.     | P.m. Plant ck oil, belts & grease |
| 23    | NA       | 8°      | 20,000  | 0        | 0        | 0         | D.K.     |                                   |
| 24    | NA       | 9°      | 17,400  | 0        | 0        | 0         | D.K.     | Took Grab/Comp. samples           |
| 25    | NA       | AN      | 17,300  | AN       | AN       | AN        | D.K.     |                                   |
| 26    | NA       | AN      | 19,800  | AN       | AN       | AN        | D.K.     |                                   |
| 27    | NA       | 7°      | 18,300  | 0        | 0        | 0         | D.K.     | CLEAN sand filters (2)            |
| 28    | NA       | 8°      | 18,900  | 0        | 0        | 0         | D.K.     |                                   |
| 29    | NA       | 9°      | 18,400  | 0        | 0        | 0         | D.K.     |                                   |
| Total |          | 0       | 0.0000  |          |          |           |          |                                   |
| Ave.  |          | #DIV/0! | #DIV/0! |          |          |           |          |                                   |
| Max.  |          | 0       | 0.0000  |          |          |           |          |                                   |
| Min.  |          | 0       | 0.0000  |          |          |           |          |                                   |

