

Environmental
Protection Agency

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

May 31, 2012

Mike Dunkle
Enchanted Acres MHP
555 Greenlawn Ave.
Columbus, OH 43223

Re: **Enchanted Acres MHP**
NPDES Permit 4PH00005/ OH0036722
Semi-Public CEI
Franklin County
Notice of Violation

Dear Mr. Dunkle:

On May 15, 2012, a Semi-Public CEI was conducted at the Enchanted Acres MHP. Present for the inspection were you, Joe Hickman, the operator of record, 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.

Findings:

1. Attached are compliance tables between February 2011 and April 2012. The facility has multiple exceedances relating to disinfection. As discussed during the inspection, alternatives to tablet-fed chlorination/dechlorination systems should be investigated such as ultra violet disinfection or a chemical feed chlorine system with a tote of hypochlorite and a pump. **Please respond with a proposed solution to the past violations.**
2. The waste water treatment plant is in poor condition. The return sludge pipe is no longer welded to a fixture. Instead, the pipe is held up with ropes and additional piping. There are weld repairs around the outside of the main treatment unit which are rusty. There was also a leaky valve from the sand filter portion of the tank which resulted in a small puddle (see attached pictures).

There are also some safety concerns with the plant as there is some rust showing on the walkway to the clarifier influent well and there is a small rung ladder to get to the influent chamber before the bar screens.

Please provide a response with a maintenance schedule which will address areas which need fixed.

3. The preliminary treatment does not prevent rags and other objects from entering the treatment train. **Please investigate upgrading the preliminary treatment.**
4. The collection system also has large peak flows. The peak flow was 316,000 GPD, the average has been 92,000 GPD, and the design is 100,000 GPD. The facility has also failed meet the Schedule of Compliance which required inflow and infiltration to be addressed. Because the Schedule of Compliance has not been met, **this letter serves as a notice of violation.**

Please respond with a schedule detailing how inflow and infiltration will be addressed.

5. Sanitary sewers appear to be nearby. One way to address the violations is to connect to sanitary sewers. I recommend investigating the availability and accessibility of sanitary sewers.

I've spoken with the City of Columbus on the issue and it appears that there may be some capacity issues so that might be a factor preventing connection.

Attached is the inspection checklist. **Please respond in writing by July 15, 2012.** If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3846 or e-mail at cole.miller@epa.ohio.gov.

Sincerely,



Cole Miller
Environmental Specialist
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

ec: Cole Miller





PERSON IN DOORWAY

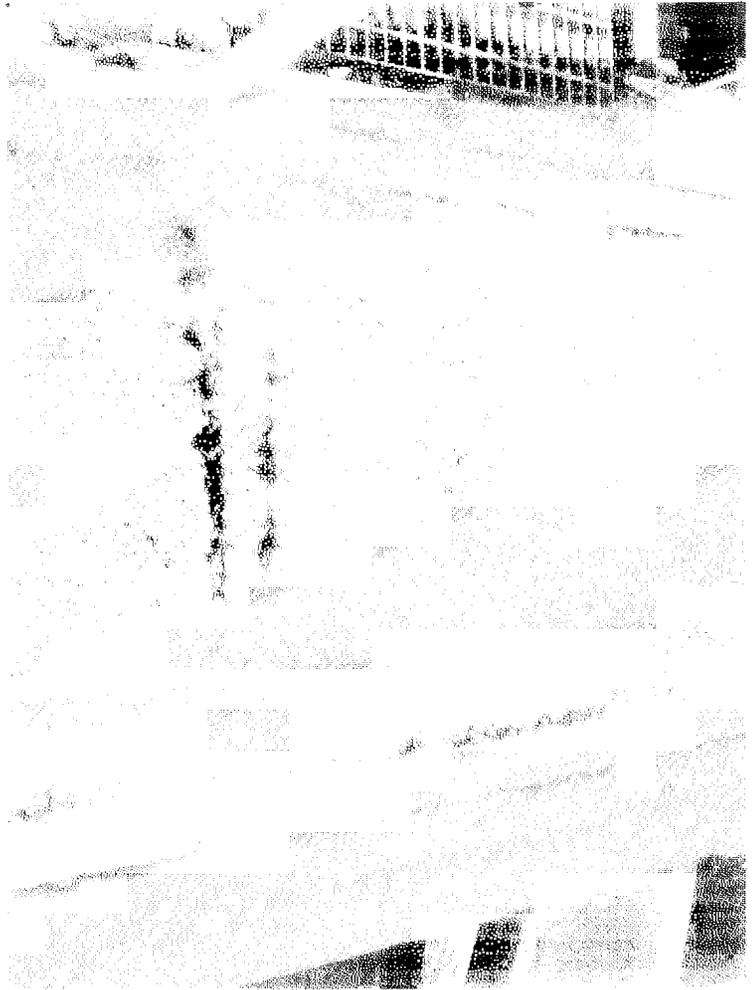


PERSON IN DOORWAY, FROM FRONT

Figure 4: Empty lobby



Figure 5: Empty hallway



NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING

Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4PH00005	OH0036722	CFI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
5/15/2012	9:00 AM	10:00 AM	Yes	No

SECTION B: FACILITY DATA

Name and Location of Facility Inspected	Permit Effective Date
Enchanted Acres MHP	9/1/2010
	Permit Expiration Date
	8/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Joseph Hickman	
Name and Title of Responsible Official	Phone Number
Joseph Hickman, System Operator	(740) 814-7342

SECTION C: AREAS EVALUATED DURING INSPECTION

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

U	NPDES Compliance	Some chlorine and E. coli violations; non-compliance with Schedule of Compliance.
M	Operations & Maintenance	There are some leaks in valves
U	Facility Site Review	Repairs and upkeep are necessary
M	Collection System	High flows experienced
S	Flow Measurement	
S	Receiving Waters	
S	Laboratory	

Comments:

Signatures

 5/25/12	 5/30/12
Cole Miller, 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 Enchanted Acres MHP between 2/1/2011 to 4/1/2012

Summary

Permit Effluent Limit Violations: 4

Permit Effluent Code Violations: 0

Permit Effluent Frequency Violations: 0

Compliance Schedule Violations: 2

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2011	001	E. coli	7D Conc	284	10000.	6/22/2011
September 2011	001	E. coli	7D Conc	284	2900.	9/1/2011
September 2011	001	E. coli	30D Conc	126	314.534	9/1/2011
September 2011	001	Chlorine, Total Residu	1D Conc	0.038	3.	9/19/2011

Missing Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
March 2011		15599	Oper & Maint	Operating & Maintenance Rept
September 2011		1799	Construction	Complete Plans & Specs

Flow Data for Enchanted Acres MHP between 2/1/2011 and 4/1/2012

	Date	Flows (MGD)
Ten Highest Flows	12/6/2011	0.316
	5/4/2011	0.314
	1/27/2012	0.292
	4/20/2011	0.273
	1/28/2012	0.270
	2/25/2011	0.267
	3/10/2011	0.249
	4/24/2011	0.237
	3/5/2011	0.219
	12/23/2011	0.218
Average Flow Rate		0.092

Method of flow monitoring:	Magnetic flow meter
Type of alarms for plant:	Visual

SECTION D: PRETREATMENT

Type of Pretreatment: Bar screen
 Does the Trash Trap need pumped: N/A
 Maintenance of pretreatment components is: Inadequate

Comments/Status: The bar screen appears to be inadequate for the size of the plant as rags are able to pass through. **Please look into improving preliminary treatment.**

SECTION E: Aeration

Color of sludge: Brown
 Quality of Sludge: Good
 Foam: None
 Odor: None

	Yes	No		Yes	No
Aeration is taking place	X	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	X
Blowers are operating	X	<input type="checkbox"/>	Blowers are on a timer	<input type="checkbox"/>	X
Skimmers are operating	<input type="checkbox"/>	X	Plant is flooded	<input type="checkbox"/>	X
Diffusers are operating	X	<input type="checkbox"/>	Grating is present	X	<input type="checkbox"/>
Sludge return is operating	X	<input type="checkbox"/>			

Maintenance of aerating equipment is adequate but the condition of the plant is deteriorating.

Comments/Status: Blowers are on for 23.5 hours of day. The MLSS levels are aimed at 3,000 – 3,500 mg/L.

Some of the equipment welds are no longer in place. The return line is attached with ropes.

SECTION F: SECONDARY TREATMENT

Clarity: Clear
 Condition of Weir: Chlorine is used to reduce algae growth
 Weir is level: Yes
 Effluent in weir: Clear
 Clarifier walls need scraped: No
 Pin floc observed: No
 Sludge blanket visible: No

Overall maintenance of settling components is: Deteriorating

Comments/Status:

SECTION G: TERTIARY TREATMENT

	Yes	No		Yes	No
Surface sand Filters:		X	Subsurface/Upflow	X	<input type="checkbox"/>
Distribution box operating		X	Beds alternated	<input type="checkbox"/>	X
Are filters ponding/flooding	<input type="checkbox"/>	X	Beds raked	<input type="checkbox"/>	X
Sand filters overgrown		X	Chlorination present	X	<input type="checkbox"/>
UV present	<input type="checkbox"/>	X	Dechlorination present	X	<input type="checkbox"/>

Frequency of cleaning: Twice per week
 Fixed media upkeep: Adequate
 Overall maintenance of components is: Adequate

Comments/Status: There have been chlorine and fecal coliform violations in the past. I recommend investigating chlorine feed solutions or ultra-violet disinfection as alternatives to your current tablet-feed system.

SECTION H: SLUDGE HANDING / STORAGE DISPOSAL

Hauler name: Carl Wheeler
 Disposal Site: Wheeler's
 Sludge wasted from: Aeration
 How often is sludge wasted: Almost daily
 Sludge drying beds: Not active
 Sludge holding tank: Yes

Overall maintenance of components is: Adequate

Comments/Status:

